

Supplier Code of Conduct

INTRODUCTION

Marmon is committed to maintaining the highest standards of integrity, ethics, and sustainability in our business and supply chains. In keeping with our cornerstone values of Trust and Ethics, we are committed to working only with sub-contractors, vendors, service providers and business partners (collectively, “Suppliers”) who adhere to consistent standards and agree to conduct their business in accordance with these principles.

This Supplier Code applies to all individuals and businesses that provide products or services to Marmon and its subsidiaries, divisions, or affiliates (“Marmon”).

As a Marmon Supplier, you must comply with all applicable laws and regulations in the countries and jurisdictions in which you operate, the requirements set out in this Supplier Code, and your contractual obligations to us. The provisions of this Supplier Code are in addition to, and do not alter or replace, the provisions of any legal agreement or contract between the Supplier and Marmon. Suppliers are expected to hold their supply chain, including subcontractors and third-party labor agencies, to standards equivalent to those contained in this Supplier Code.

If a breach of this Supplier Code occurs, Marmon may, in its sole discretion, suspend related procurement, refuse or return goods from the Supplier until appropriate corrective action is taken, and/or terminate its business relationship with the Supplier in addition to any other rights or remedies available.

1. HUMAN RIGHTS & MODERN SLAVERY

Marmon is committed to conducting business in a manner that respects and protects fundamental human rights as set out in the United Nations Universal Declaration of Human Rights. These include the right to life, liberty and security; equal rights of men and women; the right to protection under the law and against discrimination, slavery, servitude, torture or inhumane treatment; and freedom of speech, thought and religion. We take a zero-tolerance approach to modern slavery in all forms (including debt bondage, servitude, human trafficking and/or forced or child labor) occurring anywhere within our supply chain. In keeping with these commitments, our Suppliers must uphold the following labor practices.

Forced Labor, Human Trafficking and Child Labor

Suppliers must not use forced labor, including but not limited to any form of involuntary prison labor, human trafficking, forced, bonded, indentured, or slave labor. The use of child labor in working for Marmon is also prohibited. All Suppliers must be able to certify that materials in their products have not been manufactured

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using or otherwise obtained from companies that use forced or child labor or participate in human trafficking. Marmon expects its Suppliers to confirm the steps they are taking to ensure modern slavery and labor exploitation are not taking place in their business or supply chain.

Hiring and Employment Practices

Suppliers are expected to support and promote diversity in the workplace and provide equal opportunity for all qualified applicants. Suppliers must prohibit employment discrimination based on protected categories, including gender, age, ethnicity, nationality, religion, disability, or marital status. Suppliers must also comply with all local laws and regulations regarding a worker's legal right to work, including verifying work status through appropriate documentation.

Respect & No Harassment

Suppliers must ensure that the personal dignity, privacy, and rights of each individual in their workforce are respected. Suppliers must strive to create a workplace that prohibits any form of unethical treatment, threats of violence, or other forms of physical, mental or sexual harassment.

Compensation and Working Hours

Our Suppliers are required to conduct their operations in ways that promote a humane and productive work environment. Suppliers must compensate employees fairly and follow all applicable local wage, leave and hour labor laws and regulations. Where applicable, Suppliers must adhere to agreed-upon collective bargaining agreements. Suppliers shall ensure that working hours, including overtime, do not exceed applicable legal requirements and that workers are allowed appropriate leave time.

2. HEALTH, SAFETY AND ENVIRONMENT

At Marmon we place the highest priority on providing a safe workplace for our employees and to operating in an environmentally sustainable and responsible manner. No consideration, deadline or job is more important than maintaining compliance with all applicable health, safety and environmental laws and standards. Our Suppliers are expected to share our commitment to these core priorities.

Health & Safety

Suppliers must provide a safe and healthy work environment for all employees and anyone else present at their locations. Suppliers should take proactive measures that support accident prevention and minimize health risk exposure. This includes implementation of appropriate systems and procedures in order to prevent, manage, track and report occupational health and safety incidents. Suppliers should also ensure that all workers are

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sufficiently aware of health and safety risks and are appropriately trained in a language the worker can understand in relation to workplace hazards that they may be exposed to.

Environment & Sustainability

Suppliers are expected to conduct their business in an environmentally responsible way that supports sustainable operations, minimizes their impact on natural resources and protects the environment. Suppliers must ensure that their operations comply with all applicable environmental laws and that all related permits, approvals and registrations are current and maintained wherever in the world they are operating.

Restricted Materials/Substances List

Suppliers must maintain sufficient knowledge of input materials and components to ensure they were obtained from permissible sources, in compliance with laws and regulations. If mandated by applicable law, Suppliers are expected to implement appropriate policies and procedures regarding conflict minerals and exercise due diligence with the sourcing of these minerals. Suppliers may be required to show evidence of compliance with these requirements.

3. BUSINESS CONDUCT & INTEGRITY

At Marmon, operating with integrity is part of who we are and our expectation of all those who work with us. Marmon is committed to maintaining the highest standards of honest and ethical behavior in its work. We act in compliance with all applicable laws and regulations of the countries where we operate, both within the U.S. and abroad. Acting consistently with these requirements is a condition of selection as one of our Suppliers.

Compliance with Laws

Suppliers must adhere to all applicable laws and regulations in the countries and jurisdictions in which they operate. In particular, Suppliers must never seek to gain an advantage of any kind by acting fraudulently or dishonestly, making false claims or facilitating tax evasion or by allowing anybody else to do so on their behalf. Suppliers must comply with all anti-trust and other anti-competition laws.

Suppliers must comply with all applicable international trade and export control laws and regulations. In keeping with this commitment, while working with Marmon, Suppliers must not engage in any transactions or other business dealings, whether directly or indirectly, involving businesses or individuals located in countries that are subject of comprehensive sanctions embargoes imposed by the U.S. government, including Cuba, Iran, North Korea, Syria and the Crimea, Luhansk and Donetsk Regions of the Ukraine. Because trade and export restrictions are dynamic and subject to change, Suppliers are expected to maintain up to date compliance with the restrictions published by the relevant authorities in each country where they operate, including the U.S. Office

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of Foreign Asset Control and U.S. Bureau of Industry and Security. Suppliers must also maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

Bribery & Corruption

Suppliers must refrain from involvement in any and all forms of corruption, extortion, embezzlement, bribery and kickbacks. It is strictly prohibited to offer, give or accept improper payments or anything else of value in order to obtain or retain business or to secure a business advantage, whether directly or indirectly via, e.g. a third party agent or intermediary. Suppliers must ensure that gifts or other business courtesies given to customers (including Marmon employees), government officials, and any other party are appropriate in nature and in compliance with all applicable anti-corruption laws.

Conflict of Interest

Suppliers must avoid all ethical, legal, financial or other personal relationships, activities and interests that could present a potential or actual conflict of interest. If a Supplier has a relationship with any Marmon employee that could represent a conflict of interest, this must be promptly disclosed to Marmon.

4. SUPPLY CHAIN MANAGEMENT

Suppliers must procure goods and services in a responsible manner and in compliance with this Supplier Code. In particular, Suppliers are expected to communicate our requirements throughout their supply chains by adopting processes, policies, procedures and training to ensure compliance with all applicable laws and promote the standards and expectations set forth in this Supplier Code. This includes the following aspects:

Supply Chain Transparency and Right of Access

In order to ensure and demonstrate compliance with this Supplier Code, transparency is paramount. Suppliers shall keep records of all relevant documentation in relation to work undertaken for Marmon which may be reviewed to verify compliance with this Supplier Code upon reasonable request.

Training and Competency

Suppliers are expected to communicate and enforce the principles of this Supplier Code to their supervisors, employees, and suppliers. This includes establishing appropriate training measures to allow managers and employees to gain an appropriate level of knowledge and understanding of this Supplier Code, the applicable laws and regulations, and generally recognized standards.

5. SPEAKING UP & REPORTING CONCERNS

No matter your location or role, when you are working for or on behalf of Marmon you are expected to conduct yourself according to this Supplier Code and to speak up if you see something that goes against the requirements set out within. We encourage you to raise any concerns via the Marmon stakeholder reporting channels. We have a zero tolerance approach to retaliation against anyone for reporting a concern in good faith.

Reports of non-compliance or any related concerns should be made to your Marmon business representative. All such reports will be treated confidentially and communicated on a need-to-know basis only.

We thank you for your cooperation and commitment to knowing and following this Supplier Code at all times.