



Dodge Supplier Code of Conduct

Supplier Acknowledgement:

We confirm we have received, understand, and comply with the Dodge Supplier Code of Conduct.

Supplier Name: _____

Name (print): _____

Name Signature: _____

Date: _____

Version 1.0 – Published 11.01.2021





Dodge Industrial, Inc.

Supplier Code of Conduct

As reflected in the Dodge Code of Conduct, Dodge is committed to high standards of integrity and sustainability

Dodge has a 'zero tolerance' policy when it comes to unethical business behavior, such as bribery, corruption and forced labor. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically.

As a supplier, you must comply with all applicable laws and regulations, the requirements set out in this Dodge Supplier Code of Conduct and your contractual obligations to us.

This Dodge Supplier Code of Conduct defines the main principles underlying your business activities as one of our suppliers. More specific guidance, including information on hazardous substances and conflict minerals and where to go for questions, is available upon request.

A. Human rights

As a supplier to Dodge, you shall

- Respect the personal dignity, privacy and rights of each individual;
- Refuse to make any person work against his or her will; and
- Prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

B. Fair labor conditions

You shall ensure fair labor conditions. In particular, you will

- Refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- Respect the rights of employees to freely associate and bargain collectively;
- Not tolerate or use child labor in any stage of your activities other than in accordance with all applicable laws and regulations;
- Not use any forced labor, including but not limited to involuntary prison labor, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice;
- Compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;
- Ensure that working hours, including overtime, do not exceed applicable legal requirements, and where such requirements do not exist; we recommend that working hours not exceed sixty hours per week including overtime; and
- Ensure that employees are allowed at least one uninterrupted day off per week.





C. Health, safety and environment management

You shall provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way. In particular, you will

- Formally appoint a competent person to manage health, safety and environmental programs and improvements;
- Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

D. Material compliance and conflict minerals

At Dodge, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, suppliers shall ensure that the goods provided to Dodge are in compliance with requirements covered under the scope of all relevant regulations. In particular, you will

- Declare to Dodge substances which are listed in the **“Dodge List of Prohibited and Restricted Substances”** and contained in the goods you supply to Dodge;
- Implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals; and
- Respond in a timely manner to Dodge’s requests for evidence of your compliance with these requirements.

E. Business ethics

You shall conduct your business in an ethical manner. In particular, you will

- Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including Dodge employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- Adhere to anti-trust and other competition laws;
- Disclose to Dodge information regarding potential conflicts of interest relating to your activities as a Dodge supplier, including disclosure of any financial interest a Dodge employee may hold in your business;
- Protect all confidential information provided by Dodge and our respective business partners;
- Respect intellectual property of others, including Dodge; and
- Adhere to international trade regulations and export control regulations.

F. Secure business

You shall conduct your business in a secure manner. In particular, you will

- Implement reasonable measures for minimizing exposure of Dodge to security threats such as terrorism, crime, pandemics and natural disasters; and
- When visiting or working at Dodge locations, follow Dodge security procedures and report any security concerns to the appropriate Dodge channels.





G. Procurement by supplier

You shall procure goods and services in a responsible manner. In particular, you will

- Select your own tier one suppliers providing goods or services directly or indirectly to Dodge based on them agreeing to adhere to standards comparable to those set forth in this Dodge Supplier Code of Conduct; and
- When working at Dodge locations, only subcontract work with prior consent from Dodge.

H. Inspections and corrective actions

In order to ensure and demonstrate compliance with the Dodge Supplier Code of Conduct, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request. To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this Dodge Supplier Code of Conduct, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this Dodge Supplier Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our suppliers.

I. Access to remedy

In the context of our business relationship, if you or your employees believe that the terms of this Dodge Supplier Code of Conduct are not adhered to, or that Dodge is not acting in accordance with its own Dodge Code of Conduct, then we encourage you to raise your concerns via the Dodge stake-holder reporting channels. Please email ethics@dodgeindustrial.com or call 864-297-4800.

Dodge thanks you for being part of our quest.

Sincerely,

A handwritten signature in black ink that reads "Jamie Rae Arnold". The signature is written in a cursive, flowing style.

Jamie Arnold

Vice President- Supply Chain Management

