

Business and Supplier Code of Conduct

Responsible Business Alliance (RBA) principles reference | Public policy

Document: CW-RBA-001 **Revision:** 0 **Effective:** October 14, 2026

Owner: Quality / Purchasing **Status:** Approved for controlled release

1. Purpose and application

Connor-Winfield Corporation (CW) is committed to conducting business responsibly and expects its personnel and suppliers to uphold lawful, ethical, safe, and environmentally responsible practices. This document states CW expectations for its operations and for suppliers and service providers where relevant to their work with CW. It is intended for public access and supplier communication.

2. Relationship to the RBA Code of Conduct

CW uses the subject areas and principles of the Responsible Business Alliance (RBA) Code of Conduct as a reference for responsible business practices. This document is CW's own policy and is not a reproduction of, or claim of full conformity with, the current RBA Code. CW does not claim RBA membership, third-party verification, or certification through this document. Applicable laws and binding customer or contractual requirements remain controlling; any conflict or specific requirement should be referred to Quality or Purchasing for review.

3. Labor and human rights

CW expects respectful treatment and fair employment practices. Forced, bonded, trafficked, or involuntary labor is prohibited. Child labor must not be used; lawful protections for young workers must be observed. Workers should be free from harassment, abuse, discrimination, and unlawful retaliation. Working hours, wages, benefits, and lawful freedom of association must be addressed in accordance with applicable requirements. Workers must have an appropriate means to raise concerns.

4. Health and safety

CW seeks safe and healthy workplaces through hazard identification, preventive controls, appropriate equipment and personal protection, emergency preparedness, incident reporting, and employee instruction. Suppliers are expected to identify and control workplace hazards, including those involving machinery, chemicals, fire, ergonomics, and sanitation, as relevant to their operations. Personnel must be able to report unsafe conditions without retaliation.

5. Environmental responsibility

CW is committed to pollution prevention, responsible use of energy, water, and materials, and compliance with applicable environmental obligations. Activities should be assessed for relevant environmental impacts, including waste, emissions, wastewater, chemicals, and resource consumption. Applicable permits, handling rules, and reporting obligations must be evaluated and met. CW's separate Environmental Policy and Environmental Management System Manual provide additional information. CW does not claim third-party ISO 14001 certification.

6. Ethics and business integrity

CW expects honesty, accurate business records, appropriate protection of confidential information and intellectual property, and compliance with applicable anti-bribery, anti-corruption, competition, privacy, and trade requirements. Bribes, kickbacks, fraudulent statements, and improper advantages are prohibited. Conflicts of interest should be disclosed and managed. Concerns should be reviewed without retaliation against good-faith reporters.

7. Responsible mineral sourcing and supply chain

CW supports responsible sourcing of tin, tantalum, tungsten, gold, and other relevant minerals through risk-based supplier due diligence and customer reporting. Suppliers may be asked for material-origin, smelter/refiner, and relevant industry reporting information. CW's Responsible Minerals Sourcing Policy (CW-RM-001) provides further detail. CW does not make blanket conflict-free claims for all products or suppliers.

8. Management systems and supplier expectations

CW expects responsible functions to communicate relevant requirements, identify risks, assign accountability, train personnel where needed, maintain appropriate records, evaluate concerns, and pursue corrective action. Suppliers should maintain proportionate controls appropriate to their operations and promptly communicate material violations or risks that could affect CW products, workers, customers, or legal obligations. CW may request supporting information or corrective-action plans based on risk and contractual rights.

9. Questions, concerns, and review

Questions or good-faith concerns about this policy may be directed through a CW business contact or to sales@conwin.com for routing to the responsible function. CW will assess reported issues and determine appropriate follow-up. Quality and Purchasing should review this policy at least annually and after significant changes in applicable requirements, customer expectations, or the referenced RBA Code.

10. Document control and publication

This is an approved CW public policy, effective October 14, 2026. The authorized management approval was confirmed for controlled release. Quality and Purchasing shall maintain the approved master and revision history, and the approved PDF may be posted to the CW website. The official RBA Code of Conduct remains the property of its publisher; consult the Responsible Business Alliance for its current text and editions at www.responsiblebusiness.org.