



CODE OF CONDUCT

**C.E. NIEHOFF & CO.
SUPPLIERS**





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I. INTRODUCTION

C.E. Niehoff & Co. is committed to upholding the highest ethical standards, behaviors, and compliance. Honest and ethical conduct is expected from employees, officers, directors, and suppliers alike. This Supplier Code of Conduct outlines the minimum standards of behavior required of suppliers to ensure integrity and accountability.

Suppliers are expected to adhere to this Code of Conduct, as well as the terms outlined in any commercial agreements with the C.E. Niehoff & Co. The Code applies to all suppliers and partners providing products or services related to contracts or purchase orders. Additionally, suppliers are expected to extend these principles to their own suppliers to maintain consistency and ethical practices throughout the supply chain.

II. OPERATE SAFELY

C.E. Niehoff & Co. is committed to operating in full compliance with environmental and workplace safety laws, prioritizing the safety and well-being of employees and the public. Protecting employee health and preventing injuries are fundamental objectives. All employees are expected to perform their duties free from the influence of substances that could impair their ability to perform tasks safely and effectively.

1. Suppliers must comply with the applicable legal occupational safety and health regulations for the workplace.
2. They are also expected to be committed to managing health and safety risks while actively protecting the well-being of their employees, contractors, visitors, and members of the community who could be affected by their activities.



Health, Safety, & Environment

III. ENVIRONMENT

Environmental standards are upheld through our commitment to minimizing negative impacts, promoting sustainable resource use, and striving for zero environmental incidents. All activities comply with legal and regulatory requirements, supported by the continuous adoption of best practices. Waste management is prioritized, with a focus on efficient collection, storage, disposal, and reducing overall waste generation.

1. Suppliers are expected to comply with all relevant environmental laws and manage their operations in a way that prevents or minimizes any negative impact on the environment, including the communities that may be affected by their activities.
2. Suppliers are also expected to maintain an effective environmental management system that involves assessing environmental risks, implementing measures to eliminate or reduce those risks, and providing sufficient information to those who may be impacted.
3. Suppliers are expected to manage and store waste in ways that prevent pollution. They must also ensure that waste is collected and disposed of in accordance with relevant laws, while minimizing any negative environmental impacts
4. Whenever possible, suppliers should reduce waste generated by their operations and adopt circular supply chains.

IV. RESPONSIBLE SOURCING

Regulatory principles that promote socially responsible sourcing of minerals, chemicals, and other materials are strongly supported, with all activities aligned to comply with international and local laws. Our efforts are dedicated to the gradual reduction and, where possible, elimination of hazardous substances.

1. Suppliers must provide products made from materials, including constituent minerals, that are sourced responsibly and verified as 'conflict free' in accordance with the appropriate FAR and DFARS clauses.
2. Suppliers must provide supporting data on their supply chain of minerals when requested.

V. TRUSTED TO DELIVER EXCELLENCE

A. Human rights

Child labor is strictly prohibited, and any practices that hinder children's development are not tolerated. The U.S. Government's zero-tolerance policy on human trafficking is fully supported by C.E. Niehoff & Co.

Fair compensation for skill, contribution, and performance is our priority, and all individuals are treated with openness, honesty, and courtesy. Equal opportunities are provided regardless of age, disability, gender (including identity, expression, and reassignment), marital or parental status, race, nationality, ethnic or national origin, religion, sexual orientation, or any other personal characteristic. Joining a trade union is a personal choice, and that choice is fully respected.

1. Suppliers must not employ individuals under the minimum age specified by applicable law. Suppliers must also refrain from using or supporting practices that hinder the development of children.
2. Suppliers must not use any form of involuntary labor including, but not limited to, people who have been trafficked, forced, prison or debt-bonded labor.
3. Ensure that all wages meet local minimum wage requirements described by applicable law.
4. Any overtime may only be performed in accordance with the respective legal requirements and workers must receive adequate compensation for any overtime worked.
5. Standard working hours must not exceed legal limits and over time must not exceed the maximum allowed by law.
6. Suppliers are expected to foster equal opportunities for all, promoting inclusion and diversity.
7. Harassment and discrimination are strictly prohibited. Suppliers must adhere to local laws regarding discrimination and harassment and ensure that physical, verbal, or psychological abuse is not tolerated.
8. The decision on whether to join a trade union or not is a personal choice. Suppliers are expected to respect this choice and the relevant processes and laws on collective representation and consultation where applicable.

B. Working with customers, suppliers, partners and communities

Fair competition is upheld, and thorough due diligence is conducted when selecting new suppliers and partners to ensure alignment with high ethical standards.

1. Suppliers must engage only with employees, agents, intermediaries, consultants, representatives, distributors, and suppliers who uphold the same high standards of reputation and conduct as we do.
2. Suppliers should actively listen to requests or concerns from the community and respond appropriately.

C. Conflicts of interest

Situations where conflicts of interest could be perceived as influencing business decisions or actions, or preventing the best interests of C.E. Niehoff & Co. from being upheld, are avoided. If a conflict of interest is suspected or arises, it is reported.

1. Suppliers must operate their business without conflicts of interest, or appropriately address and resolve any conflicts that may arise.

D. Accurate business records

Accurate and complete records of business transactions are maintained, with full compliance to generally accepted accounting principles at all times.

1. Suppliers must maintain accurate and complete records of your business transactions.



VI. ACTING WITH INTEGRITY

A. Anti-bribery and corruption

To maintain trust, all C.E. Niehoff & Co. business affairs are conducted with integrity and at arm's length, without personal advantage or self-interest. Nothing of value is offered, given, or accepted that could improperly influence business decisions, and Facilitation Payments are not made.

1. Suppliers must conduct your business honestly, fairly, and free from any bribery or corruption.
2. Suppliers must only offer gifts or hospitality in an open and transparent way and your gifts or hospitality must never be illegal. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business decisions.
3. Suppliers must not offer or make Facilitation Payments.

B. Respecting confidential information

Technologies, intellectual property, and confidential business information are protected from unauthorized access, use, and disclosure. Confidential information, including data from customers, suppliers, joint ventures, and other parties, is shared and used internally only as permitted and never externally without authorization. Information known to be confidential or restricted from other individuals or organizations, including competitors, is not sought or used.

1. Suppliers must safeguard our resources and information and ensure that all data and documents are kept secure.

2. Suppliers must keep confidential information confidential and never use information which you should not have.
3. Suppliers must never offer or supply information to C.E. Niehoff & Co. employees which they should not have.

C. Export controls, sanctions and import obligations

Compliance with import and export laws, regulations, and procedures is upheld in all our operations. The U.S. Foreign Corrupt Practices Act is followed, prohibiting the offer of anything of value to foreign officials to improperly influence decisions for business purposes. The Act also prohibits the use of false records or accounts in foreign business activities.

1. Suppliers must comply with all relevant export control and sanctions legislation when exporting or importing goods or technology and shall plan for and obtain all necessary authorizations and permits to ensure timely and compliant delivery of their products.
2. Suppliers shall also have in place all the necessary processes to manage access to export controlled goods or technology only by staff or other entities authorized to have such access. Where applicable, this requirement shall be flowed down to any sub-tier suppliers. Suppliers should also be alert for suspicious inquiries from those who might be attempting to gain illicit access to goods, software, or technology.



D. Competitive behavior and antitrust

C.E. Niehoff & Co. believes in open and fair competition and conducts business in an honest and straightforward manner.

1. Suppliers must comply with competition (antitrust) laws in the countries where they operate or sell product.
2. Suppliers must not collaborate with competitors or their own suppliers in a manner that unfairly limits competition.

E. False claims

We fully support the False Statements Accountability Act of 1996, which prohibits individuals or companies from knowingly falsifying or concealing material facts, making false or fraudulent statements, or using false writings in matters under the jurisdiction of the U.S. executive, legislative, or judicial branches.

1. Suppliers are prohibited from submitting or causing the submission of false claims to the U.S. government.

F. Preventing the facilitation of tax evasion

Assistance is not provided to our customers, suppliers, or other partners in fraudulently underreporting or evading taxes.

1. Suppliers must not ask us to do anything which helps them to evade tax.
2. Suppliers must issue invoices and other contractual documents that accurately reflect the agreed-upon commercial terms and contain no false information.
3. Suppliers must not, when acting on our behalf, help others to evade tax.

G. Political support

Lobbying activities are conducted in compliance with all relevant laws, with ethical conduct maintained in all interactions with governments, agencies, and their representatives. Corporate contributions or donations are not made to political parties or to organizations, think tanks, academic institutions, or charities closely associated with a political party or cause.

1. Suppliers must act legally and with honesty, integrity, and transparency at all times, in all interactions with governments, their agencies and representatives.



TRUTH

BUILDS

TRUST



VII. SUPPLIER COMMITMENT

Communication

Suppliers are required to disseminate these requirements throughout their own supply chain and incorporate the principles set out in this Supplier Code of Conduct as part of their routine business practices.

Global supplier code of conduct adherence

Suppliers must comply with all aspects of this Supplier Code of Conduct, as required by the terms and conditions of our purchase orders. To meet these standards, suppliers are expected to have policies and practices in place that effectively apply the principles of the code within their operations. Additionally, suppliers are encouraged to collaborate with C.E. Niehoff & Co. to evaluate and continuously improve their environmental and societal impact.

C.E. Niehoff & Co. reserves the right to audit suppliers' compliance with the Supplier Code of Conduct, including conducting onsite audits as needed. Upon request, suppliers must complete evidence-based assessments of their performance in environmental, social, and governance matters and share the results with us. Suppliers must also retain documentation demonstrating compliance with the code and provide access to such documentation upon reasonable notice.

Compliance with the Supplier Code of Conduct is critical to doing business with C.E. Niehoff & Co. In cases of non-compliance, the company will exercise its contractual rights, which may include terminating the supplier relationship.

Supplier concerns

Concerns or issues that conflict with this Code of Conduct should be raised openly and confidently, knowing that retaliation is strictly prohibited by C.E. Niehoff & Co. Suppliers are encouraged to follow this principle and speak up about anything that raises concern. Questions or concerns can be reported online, by phone, or through your designated company contact.





C.E. Niehoff & Co.
2021 Lee Street
Evanston, Illinois 60202
T +1 847 866 6030
ceniehoff.com
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