

Gillespie & Powers, Inc. ("G&P") is committed to the highest standards of integrity, and G&P expects all of its suppliers ("Suppliers") to adhere to these standards and work towards continuous improvement in all aspects of their operations. This Supplier Code of Ethics & Conduct is designed to promote ethical business practices, ensure compliance with laws and regulations, and foster a safe, fair, and sustainable working environment. Suppliers must impose substantially similar obligations as those set forth here on their own suppliers, subcontractors, and agents.

1. Legal and Regulatory Compliance

Suppliers must know and comply with all applicable local, national, and international laws and regulations, and must treat these legal requirements as a minimum standard for conducting business.

Suppliers must adhere to all trade, export, and import laws and regulations.

2. Labor and Human Rights

Respect for Human Rights

Suppliers must uphold and respect the protection of internationally proclaimed human rights.

Non-Discrimination; No Harassment

Suppliers must ensure that all hiring and employment practices, as well as workplaces, are free from discrimination or harassment based on race, color, age, sex, gender, sexual orientation, gender identity, ethnicity, disability, health status, religion, political affiliation, union membership, national origin, marital status, pregnancy, parental status, or on the basis of any personal characteristic protected by law.

G&P requires Suppliers to enact practices to maintain a respectful and safe workplace. Suppliers must not tolerate physical violence, threats, corporal punishment, mental coercion, verbal abuse, disrespectful behavior, bullying, or harassment of any kind of any worker.

No Child Labor

Suppliers must not employ workers under the minimum legal working age as stipulated by local laws, but in no event under the age of 15 years for regular work and 18 years for hazardous work, per the International Labour Organization Conventions.

No Forced Labor

Suppliers must not use forced or involuntary labor, whether bonded, imprisoned, or indentured, including debt servitude and all forms of human trafficking. This includes the use of any form of threat, force, coercion, fraud or exploitation.

All members of the suppliers' workforce will understand the terms of their employment. Withholding of, or destruction of, employee identity or immigration documents, passports or work permits is prohibited.

Fair Wages, Benefits, and Working Hours

Suppliers must pay workers in accordance with all applicable local wage and working hours laws and regulations, including those relating to minimum wages, overtime hours, and legally mandated benefits.

Freedom of Association

Suppliers must respect the rights of workers to associate freely, including to form and join legally recognized labor organizations, and to bargain collectively. Workers must be free to engage in these activities without retaliation, harassment, or intimidation.

3. Health and Safety

Suppliers must comply with all applicable health and safety laws and regulations and must provide a safe and healthy work environment for all workers, including employees and/or contractors and other third parties.

Suppliers must take appropriate measures to prevent workplace hazards and ensure the physical and mental well-being of workers.

Suppliers must provide workers with the necessary protective equipment and training to perform their jobs safely.

4. Environmental Responsibility

Suppliers must comply with all applicable environmental laws and regulations.

Suppliers must actively work to reduce their environmental impact by minimizing waste, conserving resources, and reducing emissions, and must make continuous improvements in environmental protection.

Suppliers must ensure safe handling, movement, storage, recycling, and/or disposal of hazardous substances.

5. Ethical Business Practices

Suppliers must conduct business ethically, ensuring integrity and transparency in all dealings.

Conflict of Interest; Gifts

Suppliers must avoid any conflicts of interest (or the appearance of same) that could compromise the impartiality of their business judgment or the integrity of G&P. This includes providing gifts, entertainment, or trips to G&P personnel that are not part of a reasonable business relationship.

Confidentiality and Intellectual Property

Suppliers must act lawfully and with integrity in handling confidential and/or proprietary information, competitive data, and other intellectual property. Suppliers will comply with legal requirements regarding fair competition and antitrust. G&P's logos or marks may not be used without G&P's prior written approval.

Bribery and Anti-Corruption

Suppliers must comply with all applicable anti-bribery and anti-corruption laws, such as the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act. Suppliers must never offer or accept bribes, kickbacks, or other improper incentives in connection with G&P's business.

Whistleblower Protection

Suppliers must not engage in retaliation in any form against a person for reporting a compliance or ethical issue, or for any other reason. Suppliers must comply with applicable whistleblower protection laws, including implementing processes to provide confidential reporting mechanisms and to protect individuals from retaliation.

6. Quality and Continuous Improvement

Suppliers must provide products and services that meet or exceed the agreed-upon quality and safety standards. Suppliers must continually strive to improve their products, services, and processes through innovation and best practices.

7. Training and Communication; Reporting

Suppliers must ensure that workers are aware of and understand this Code.

Suppliers must develop and maintain regular training programs for workers

Suppliers must have mechanisms in place for employees to report concerns or violations of this code without fear of retaliation.

8. Compliance with the Code

This Code sets forth the minimum requirements that must be met to be a Supplier to G&P. G&P reserves the right to terminate business with Suppliers in the event of non-compliance with this Code.

G&P maintains the right to audit Suppliers' compliance with this Code, and Suppliers must be transparent and cooperate with G&P in support of such audits or similar assessments or requests. Suppliers are required to promptly report to G&P any legal violations or violations of this Code.

Suppliers must take corrective action if any non-compliance is identified. Suppliers shall be liable for any penalties or fines imposed by legal authorities or regulatory agencies resulting from failure to comply with this Code.

The undersigned acknowledges that it has read, understands, and agrees to adhere to the G&P Supplier Code of Conduct & Ethics

Supplier Name: _____

Signer's Name & Title: _____

Signature: _____

Date: _____