	Code of document: 51-OM-0001	Description of Document: Grote Supplier Code of Conduct	
	Elaborated by: Clark, Mariah 3/11/2025	Approved by: McGarry, Chris 3/11/2025	Revision : 0
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HEALTH & SAFETY

Above all, Grote Industries (Grote) is committed to the health, safety and well-being of all our employees, team members, contractors, customers and members of the public. The goods and services you provide must meet the ethical and legal standards described in this Code. This includes knowing and fully complying with all applicable laws, rules and regulations. As a Grote supplier, you are expected to provide and promote a safe and healthy working environment that supports accident prevention and minimizes risk to all individuals involved in the work that you undertake for us. Promoting a safe and healthy working environment must also include taking immediate action to address and reporting unsafe conditions; ensuring team members, contract workers and subcontractors are trained and knowledgeable on safety guidelines and procedures; retention of safety records; emergency preparedness and response; and ensuring team member, contract workers and subcontractors are free from the effects of alcohol and illegal drugs.

ENVIRONMENTAL PROTECTION AND SUSTAINABILITY


Grote is committed to protecting and conserving the environment for the benefit of all our stakeholders. We want our suppliers to have a similar level of environmental and sustainability commitment. We expect you to understand the environmental issues associated with the production of goods and services that you provide and abide by the letter and the spirit of all associated federal, state and local environmental laws, rules and regulations, including proper handling of all potentially hazardous or regulated materials. We also expect that you will commit to minimizing your production of hazardous air emissions through methods such as conservation and the use of clean and renewable energy sources.

ANTI-CORRUPTION AND BRIBERY

As our supplier, you and your affiliated entities are required to conduct business activities in compliance with all applicable federal, state and local laws, rules and regulations. Grote maintains a zero-tolerance approach to any type of bribery, fraud or corrupt practice. Consequently, as our suppliers, we require you not to engage in corruption, extortion, embezzlement or bribery to obtain an unfair or improper advantage or influence. You are required to abide with all applicable anti-corruption laws, rules and regulations. This includes the Foreign Corrupt Practices Act (FCPA) and applicable international anti-corruption conventions and not engaging in activities that would violate, or cause Grote to violate, applicable international trade and export laws including regulations of the Office of Foreign Assets Control of the United States Department of Treasury. Grote expects you to have procedures in place to protect employees, agents and contractors who provide you with information on any unfair or inappropriate business activities. As a Grote supplier, you may be asked to provide your internal policies and procedures related to the detection and prevention of corrupt practices.

FAIR COMPETITION

Grote is committed to both the letter and spirit of fair competition and antitrust laws to ensure a free and open market. You are required to comply with all such laws and consult your own legal counsel. In addition, you must comply with our procedures designed to promote integrity and fair competition.

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Examples of prohibited conduct include (but are not limited to) agreements with a competitor to fix prices or other terms and conditions, to rig bids (such as in response to RFP), to unfairly use confidential information, or to divide or not compete in certain markets. You must conduct your business with integrity, avoiding misrepresentation of your products and services, and those of your competitors.

REGULATORY AND AFFILIATE REQUIREMENTS

Most of Grote's businesses are subject to state and federal regulatory rules and laws. When working with Grote and its affiliates, we expect you to understand and comply with the relevant regulatory requirements and rules. Our federal and state regulators have established clear rules that govern how transactions and information sharing can be undertaken between our state regulated network business and our unregulated Grote affiliates. These rules are documented in the respective Code of Conduct rules for each Grote business, and you are expected to be aware of these and abide by them. It is your responsibility to ask your Grote contact if you have questions or concerns regarding complying with these requirements.


CONFLICT MINERALS

Grote supports the purpose of Section 1502 of the Dodd-Frank Act relating to conflict minerals (Conflict Minerals Rule). Conflict minerals include gold, tin, tungsten or tantalum originating from the Democratic Republic of the Congo, or an adjoining country, including recycled or scrap materials traceable to this region. We expect that you, as a supplier, have controls and policies in place to ensure that you are in compliance with the Conflict Minerals Rule and do not supply us products containing conflict minerals. If you believe that conflict minerals are contained within products supplied to us, you must investigate and disclose your findings to us regarding the origin of the suspected conflict mineral.

RESPECT FOR HUMAN RIGHTS

Respect for human rights is a fundamental value at Grote. Our approach is guided by international human rights principles encompassed in the Universal Declaration of Human Rights, the International Labor Organization's ("ILO") Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, and the Sustainable Development Goals (SDGs) approved by the member states of the United Nations. Across the value chain, we are committed to respecting and protecting human rights. Therefore, you are expected as our supplier to comply with all applicable employment laws, rules and regulations, including state, federal and local laws and regulations regarding:

- Equal opportunity and non-discrimination
- Forced or compulsory labor (including slavery, use of prison labor and human trafficking)
- Child labor, including minimum hiring age limits
- Freedom of association and collective bargaining
- Fair remuneration

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- Workplace harassment
- Working Hours and payment of wages, including minimum wages, overtime and social security benefits
- Health & Safety
- Whistleblower protections Additionally, we also expect you to:
 - Refrain from discriminatory practices and protect the rights of ethnic minorities and indigenous peoples in the countries where you do business.
 - Demonstrate courtesy, honesty, and respect for others in your dealings with Grote employees, agents and other contractors. Grote will not tolerate behavior that might discriminate, intimidate, harass, disrupt, or interfere with anyone performing work on our behalf.

USE OF GROTE'S ASSETS

You must use Grote assets for the purpose for which they were provided, complying at the same time with all contractual terms and environmental, health and safety laws and regulations. You may not use, reproduce, access, modify, download, distribute, copy or retain any works, trademarks, patents or other intellectual property belonging to or created for Grote. You must comply with all information protection, data security and privacy laws in connection with your work for Grote. You may not use information or data obtained in connection with your work to trade the securities of Grote or our affiliates.


CONFLICTS OF INTEREST

As a Grote supplier, you must avoid actual or potential conflicts of interest with Grote and its affiliates. Generally speaking, a conflict of interest is a situation where your personal interests, as a supplier, could directly or indirectly conflict the best interests of Grote or its affiliates. This includes having:

- a significant financial interest in another company in our industry, such as a competitor
 - a family member or other close personal relative working for Grote or its affiliates
 - having access to Grote's proprietary information while contracting with competitors
- Should an actual or potential conflict of interest arise, you are expected to immediately disclose it to your Grote contact.

GIFTS AND HOSPITALITY

As a supplier, you should not offer or give gifts or hospitality to Grote employees that would violate our Code of Business Conduct and Ethics. Grote generally permits limited gifts and hospitality that will not create an appearance of obligation or favoritism. Our employees must also disclose offers of gifts and entertainment valued at more than \$100.

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REPORTING CONCERNS

No code, however comprehensive, can anticipate and address every ethical situation you may encounter when working with Grote and its affiliates. This Code must be complemented by your good judgment and common sense. Situations will arise where you need clarification or more information to make the right decision. You are responsible for recognizing these situations and acting accordingly, including informing Grote.