

Buckman Supplier Code of Conduct

It is Buckman's expectation that all supplier's will adhere to this Supplier Code of Conduct.

Compliance: Suppliers will comply with all applicable regulations and laws while conducting business with Buckman and in all countries of operation.

Conflicts of Interest: Suppliers will avoid engaging in activities with Buckman associates that do not coincide with Buckman's interest or could potentially make it difficult for Buckman associates to fulfill their duties fairly to Buckman.

Anti-Corruption and Bribery: Suppliers are prohibited in participating in activities that promote bribery (soliciting, offering or accepting a bribe in money or other forms of payment) or encourage bribery. Suppliers will comply with all applicable regulations and laws to prevent corruption and bribery.

Data Privacy and Protection: Suppliers will take the necessary precautions to protect Buckman's confidential information in compliance with applicable data privacy laws.

Antitrust and Fair Competition: Suppliers will not participate in any forms of anti-competitive behavior such as price fixing, predatory pricing, or take inappropriate advantage of social or financial conditions to gain unfair advantage.

Import/Export Control, Sanctions and Anti-Terrorism: Suppliers will comply with all regulations and laws that govern import/export of goods, sanctions/embargoes, and avoid conducting business transactions with persons or entities that may appear on restricted lists.

Money Laundering, Financial Reporting, Record Keeping, and Insider Trading: Suppliers will comply with all applicable regulations and laws applicable to tax and insider trading, not engage in money laundering activities, and provide accurate, thorough and truthful information in regard to public filings and reporting.

Quality: Suppliers will ensure that goods and products meet contracted quality expectations.

Environment: Suppliers will conduct operations in a manner to reduce risk and minimize negative impacts to the community and the environment. Suppliers will comply with all applicable regulations, laws, and industry best practices applicable to the environment. Suppliers will manage natural resources efficiently throughout operations. Suppliers will monitor and pursue continual reductions of operational emissions to help mitigate adverse climate change impacts of direct and indirect greenhouse gas emissions.

Health and Safety: Suppliers will comply with all applicable regulations, laws, and industry best practices applicable to safety in the workplace. Suppliers will provide safeguards, controls, standards, management systems, and training to ensure safe working conditions for their employees.

Product Stewardship and Sourcing: Suppliers will ensure raw material sourcing, goods and products meet all applicable regulations and laws to ensure highest levels or consumer health and safety.

Collective bargaining: Suppliers will ensure that basic human rights in labor issues are maintained, such as freedom of association, and the right to join or not join trade unions to participate in collective bargaining. In areas where collective bargaining is restricted by law, suppliers will ensure alternative methods are in place to support independent and free bargaining.

Child Labor: Suppliers will not engage in child labor, avoid child labor recruitment, and will remain in accordance with International Labor Organization (ILO) standards regarding child labor.

Forced and Compulsory Labor: Suppliers will not participate or engage in forced or compulsory labor, bonded labor, involuntary prison labor, or human trafficking.

Wages and Benefits: Suppliers will comply with all applicable regulations and laws in regard to appropriate wages, work hours, overtime and benefits for its employees.

Discriminatory Practices: Suppliers will not engage in discriminatory practices in any condition of employment on the basis of race, religion, color, national origin, gender, sexual orientation, age, military status, disability, labor union membership, or any other non-job-related characteristics.

Fair Treatment: Suppliers will not allow its employees to be subjected to any harsh or inhumane treatment such as physical or sexual harassment, physical abuse, verbal abuse, threats or other forms of intimidation. Suppliers shall have a grievance process for employees to report suspected misconduct and shall not retaliate against employees who report misconduct.

Supplier Diversity: Buckman encourages all of its suppliers to have implemented supplier diversity programs in an effort to support minority owned, woman-owned or other small diverse businesses.

Conflict Minerals: Suppliers that incorporate certain minerals (tin, titanium, gold and tungsten), into their products and processes will inquire and ensure they come from conflict-free sources.

Reporting and Retaliation: In the actual even or suspected breach of the Supplier Code of Conduct, contact the Buckman Legal Department: legalcompliance@buckman.com.