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	Title: Supplier Code of Conduct		

Effective Date: May 1, 2025

At Caton Connector Corporation, we are committed to conducting business with integrity and in compliance with the highest ethical standards. We expect the same from our suppliers. This Supplier Code of Conduct sets forth the minimum standards we require from all partners in our supply chain. This code applies to all Caton suppliers, contractors, and their subcontractors.

1. Labor & Human Rights

Suppliers must uphold the human rights of workers and treat them with dignity and respect.

- **Freely Chosen Employment:** No forced, bonded, indentured, or prison labor. All work must be voluntary.
- **Child Labor Avoidance:** No employment of workers under the age of 15 or under the legal minimum age, whichever is higher.
- **Working Hours:** Working hours must comply with local laws and not exceed 60 hours per week, including overtime. At least one day off every 7 days.
- **Wages & Benefits:** Compensation must comply with applicable laws and include all mandated benefits.
- **Humane Treatment:** No harassment, abuse, or inhumane treatment.
- **Non-Discrimination:** Equal opportunity in hiring and employment without discrimination.
- **Freedom of Association:** Workers may associate freely, join labor unions, or engage in collective bargaining per local law. Workers must be able to communicate openly and freely and without fear of retaliation.

2. Health & Safety

Suppliers must provide a safe and healthy work environment.

- **Occupational Safety:** Proactive identification and mitigation of workplace hazards.
- **Emergency Preparedness:** Plans, procedures, and training for emergencies must be in place.
- **Industrial Hygiene:** Exposure to hazardous agents must be identified and controlled.
- **Machine Safeguarding:** Proper machine controls and maintenance to prevent injury.

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- **Physically Demanding Work:** Risk from heavy lifting or repetitive motions should be minimized.

3. Environmental Responsibility

Suppliers must operate in a way that respects and protects the environment.

- **Environmental Permits & Reporting:** All permits must be obtained and maintained.
- **Pollution Prevention & Resource Efficiency:** Waste and energy use should be minimized.
- **Hazardous Substances:** Managed, labeled, and disposed of per regulations.
- **Waste & Emissions:** Must control solid waste, wastewater, and air emissions.
- **Energy Use & GHG Emissions:** Track and make efforts to reduce greenhouse gas emissions.

4. Ethics

Suppliers must uphold high standards of integrity and transparency.

- **Business Integrity:** No corruption, bribery, extortion, or embezzlement.
- **No Improper Advantage:** Avoid conflicts of interest and unethical gifts or payments.
- **Disclosure of Information:** Business records must be accurate and transparent.
- **Intellectual Property:** Must be protected and respected.
- **Fair Business & Competition:** Comply with antitrust and fair competition laws.
- **Identity Protection:** Whistleblower confidentiality must be respected and protected.

5. Responsibility & Oversight

To make sure this Code of Conduct is followed, suppliers are expected to have basic systems in place to:

- **Know and follow the law:** Stay up to date on local laws and any specific customer requirements.
- **Identify and manage risks:** Be aware of potential risks related to labor, safety, environment, and business ethics in your operations.
- **Fix problems when they come up:** Take prompt action to correct violations or issues.

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- **Communicate expectations:** Share this Code with your employees and subcontractors so they understand and can follow it.

6. Additional Expectations (Encouraged)

We encourage suppliers to go beyond compliance and demonstrate leadership in the following areas:

- Source conflict minerals responsibly, following OECD guidance.
- Promote environmental sustainability in operations.
- Engage in ethical sourcing and supply chain transparency.
- Offer safe channels for employees to report violations (hotlines or similar tools).

7. Monitoring & Enforcement

We reserve the right to assess compliance with this Code through audits, assessments, or self-declarations. Suppliers are expected to cooperate fully and implement corrective actions when necessary. Failure to comply may result in the termination of the business relationship.

8. Acknowledgment

By doing business with Caton Connector Corporation, suppliers agree to comply with this Supplier Code of Conduct and ensure that their own supply chains meet these expectations.

For questions or clarification on anything in this document, please contact us at info@caton.com or 781-585-4315.