



## Supplier Code of Conduct

Rea is committed to maintaining the highest standards of integrity, ethics, and sustainability in our supply chain. In keeping with our cornerstone values of Trust, Transparency, and Teamwork, we are committed to working only with sub-contractors, vendors, service providers, and business partners (collectively, “suppliers”) who adhere to consistent standards and agree to conduct their business in accordance with these principles.

Our Supplier Code of Conduct (“Code”) is the foundation for ensuring social, environmental responsibility, and ethical conduct throughout our supply chain, from raw materials to the doors of our facilities. The principles outlined in this Code govern our suppliers’ relationship with Rea and how we expect them to operate. Where there are differences between the Code and applicable local or national laws and regulations, Rea expects the supplier to follow the stricter standard.

Fundamental to adopting this Supplier Code of Conduct is the understanding that Rea and its suppliers must operate in full compliance with laws, rules, and regulations of the countries in which they operate and all applicable international trade and export control laws and regulations.

Suppliers are expected to hold their supply chain, including subcontractors and third-party labor agencies, to standards equivalent to those contained in this code. If a breach of this code occurs, Rea may, in its sole discretion, suspend related procurement, refuse or return goods from the supplier until appropriate corrective action is taken, and/or terminate its business relationship with the supplier in addition to any other rights or remedies available.

Fundamental to our success is our Mission:

***Our mission is to lead our industry in the quality of our products, the safety of our employees, and in the value that we provide to our customers. A principal requirement is to consistently achieve financial results that will provide funds from operations to support reinvestment in facilities and growth that will increase the value of the Company. Innovation and cost-effectiveness are essential to all of our efforts. Rea must attract and develop capable people who accept the accountability for their own jobs, as well as the responsibility to improve our Company’s performance. We all must work together to earn job security and to create a productive, challenging and safe work environment. Rea will be socially responsible and will endeavor to improve quality of life in the communities in which we operate. It is vital to our future that Rea employees understand, are committed to, and work together to carry out this Mission.***

Rea will take steps to ensure that our suppliers’ business practices are consistent with the Code. This applies in our selection of new suppliers and in our on-going relationships with our existing

suppliers. We expect our suppliers to not just conduct business consistent with this Code, but also to set similar expectations with their own supply chain.

Suppliers must maintain accurate and up-to-date records of their compliance with this Code and all applicable laws and regulations. Upon request from Rea to provide such records or internal policies and procedures, documentation must be shared promptly.

While suppliers are expected to demonstrate their compliance with the Code upon request, Rea also reserves the right to audit supplier facilities and practices to confirm compliance. Suppliers are encouraged to develop and make public their own code of business practices and supplier code of conduct policies and to report publicly on their own efforts to monitor and enforce these standards of conduct and compliance throughout their supply chains. Specifically, this applies to the following areas in this code.

- A. Labor
- B. Health and Safety
- C. Environment
- D. Ethics
- E. Management Systems

## **A. LABOR**

Suppliers are committed to upholding the human rights of workers, and to treating them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker. The labor standards are:

### **1) Freely Chosen Employment**

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery, or trafficking of people is not permitted. This includes transporting, harboring, recruiting, transferring, or receiving people by means of threat, force, coercion, abduction, or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company facilities including, if applicable, workers' dormitories or living quarters. All work must be voluntary, and workers shall be free to leave work at any time or terminate their employment without penalty if reasonable notice is given as per worker's contract.

### **2) Child Labor**

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the greater of (i) the age of fifteen, (ii) the minimum applicable legal age for completing compulsory education in a country, or (iii) under the minimum legal age for employment in the country. Suppliers shall implement an appropriate mechanism to verify the age of workers. Workers under the age of 18 (Young Workers) shall not perform work that is likely to jeopardize their health or safety, including night shifts and overtime. Suppliers shall provide appropriate support and training to all student workers. If child labor is

identified, assistance and remediation according to the stricter of international standards or local standards shall be provided.

### **3) Working Hours**

Working hours are not to exceed the maximum set by local law. Suppliers must keep employee working hour and pay records in accordance with local and national laws and provide records to Rea upon request.

### **4) Wages and Benefits**

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours, and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. All use of temporary and/or outsourced labor will be within the limits of the local law.

### **5) Humane Treatment**

There is to be no harsh or inhumane treatment including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

### **6) Non-Discrimination, Non-Harassment, Diversity, Equity, and Inclusion**

Suppliers will not discriminate in recruiting, screening, hiring, nor employment practices based on race, color, religion, gender, gender stereotyping, gender identity/expression, sexual orientation, pregnancy (including pregnancy, childbirth, and medical conditions related to pregnancy, childbirth and breastfeeding), national origin, ancestry, citizenship status, age, military or veteran status, mental or physical disability, genetic information, medical condition, marital status or any other factor protected by law, except where sex is a bona fide occupational qualification in accordance with Federal, State, and Local legislation (ILO 111).

Suppliers will promote diversity, equity, and inclusion by ensuring fair treatment for all people in the workplace, respecting the diversity of all workers, as well as fostering an organizational culture of inclusivity and respect for fundamental rights and dignity. Suppliers will demonstrate a commitment to the Rights of Women, the Rights of Minorities, as well as the Rights of Indigenous Persons. Religious practices should also be reasonably accommodated.

### **7) Freedom of Association**

In conformance to local law, suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively, and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation, or harassment.

## **B. HEALTH AND SAFETY**

At Rea, we place the highest priority on providing a safe workplace for employees and to operating in an environmentally sustainable and responsible manner. No consideration, deadline, or job is more important than maintaining compliance with all applicable health, safety, and environmental laws and standards. Our suppliers are expected to share our commitment to these core priorities.

Suppliers must provide a safe and healthy work environment for all employees and anyone else present at their locations. Suppliers should take proactive measures that support accident prevention and minimize health risk exposure. This includes implementation of appropriate systems and procedures to prevent, manage, track, and report occupational health and safety incidents. Suppliers should also ensure that all workers are sufficiently aware of health and safety risks and are appropriately trained in a language the worker can understand in relation to workplace hazards that they may be exposed to.

Recognized management systems such as ISO 45001 and ILO Guidelines on Occupational Safety and Health may be useful sources of additional information. The health and safety standards are:

### **1) Occupational Safety**

Worker potential for exposure to health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, fall hazards, etc.) are to be identified, assessed and mitigated. Where hazards cannot be adequately controlled, workers are to be provided with appropriate, well-maintained, personal protective equipment, and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women and nursing mothers from working conditions with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers, including those associated with their work assignments, and provide reasonable accommodations for nursing mothers.

### **2) Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by local law, whichever is more stringent. Emergency plans should also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment, and property.

### **3) Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

#### **4) Industrial Hygiene**

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated and controlled. If any potential hazards were identified, suppliers shall look for opportunities to eliminate and/or reduce the potential hazards. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

#### **5) Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

#### **6) Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

#### **7) Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities and potable. Workers are to be provided with adequate lighting, heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

#### **8) Health and Safety Communication**

Suppliers shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, physical hazards, pathogens, toxins, and other health related risks. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise any health and safety concerns without retaliation.

### **C. ENVIRONMENT & SUSTAINABILITY**

Suppliers are expected to conduct their business in an environmentally responsible way that supports sustainable operations, minimizes their impact on natural resources, and protects the environment. Suppliers must ensure that their operations comply with all applicable environmental laws and that all related permits, approvals, and registrations are current and maintained wherever in the world they are operating.

Recognized management systems such as ISO14001 and the Eco Management and Audit System (EMAS) may be a useful source of additional information. Relevant environmental standards to be followed are:

### **1) Environmental Permits and Reporting**

All required environmental permits (e.g., discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current and their operational and reporting requirements are to be met.

### **2) Pollution Prevention and Resource Reduction**

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance, and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

### **3) Hazardous Substances**

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labeled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

### **4) Solid Waste**

Suppliers shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle solid waste (non-hazardous). They shall supply the data for all products and related services to Rea upon request.

### **5) Air Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, and combustion byproducts generated from operations are to be characterized, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances are to be effectively managed in accordance with the Montreal Protocol and applicable regulations. Suppliers shall conduct routine monitoring of the performance of air emission control systems. They shall supply the data for all products and related services to Rea upon request.

### **6) Materials Restrictions**

Suppliers must maintain sufficient knowledge of input materials and components to ensure they are obtained from permissible sources, in compliance with laws and regulations, including labeling for recycling and disposal. If mandated by applicable law, suppliers are expected to implement appropriate policies and procedures regarding conflict minerals and exercise due diligence with the sourcing of these minerals. Suppliers may be required to show evidence of compliance with these requirements.

### **7) Water Management**

Suppliers shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge, seeks opportunities to conserve water, and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Suppliers shall conduct routine monitoring of the performance of wastewater treatment and containment systems to

ensure optimal performance and regulatory compliance. They shall supply the data for all products and related services to Rea upon request.

#### **8) Energy Consumption and Greenhouse Gas Emissions**

Suppliers are to establish greenhouse gas (“GHG”) data for all products and related services supplied to Rea upon request. Energy consumption and all relevant Scopes 1 and 2 greenhouse gas emissions (using the GHG protocol) are to be tracked, documented, and publicly reported. Where such tracking is not currently available Suppliers should establish a plan to implement tracking within one-year and provide the data and/or components required to calculate GHG emissions. Suppliers are to look for methods to improve energy efficiency and to minimize energy consumption and greenhouse gas emissions.

### **D. D. ETHICS**

Our success depends on doing the right thing which builds our good reputation. We must strive to preserve this reputation and enhance it by always acting in an ethical manner. In honoring this commitment, we must uphold the highest standards of ethics including:

#### **1) 1) Business Integrity**

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero-tolerance policy to prohibit all forms of bribery, corruption, extortion, and embezzlement.

#### **2) Conflicts of Interest**

Conflicts of interest can occur when we take actions that make it difficult to perform our duties objectively and effectively. Examples of these conflicts may include but are not limited to: Taking advantage of Company opportunities we learn about as a result of our position with the Company.

Suppliers must avoid all ethical, legal, financial, or other personal relationships, activities and interests that could present a potential or actual conflict of interest. If a supplier has a relationship with any Rea employee that could represent a conflict of interest, this must be promptly disclosed to Rea.

#### **3) No Improper Advantage / Bribery and Corruption**

Suppliers must refrain from involvement in all forms of corruption, extortion, embezzlement, bribery, and kickbacks. It is prohibited to offer, give, or accept improper payments or anything else of value in order to obtain or retain business or to secure a business advantage, whether directly or indirectly via a third-party agent or intermediary. Suppliers must ensure that gifts or other business courtesies given to customers (including Rea employees), government officials and any other party are appropriate in nature and in compliance with all applicable anti-corruption laws. Monitoring, record keeping, and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

#### **4) Disclosure of Information**

All business dealings should be performed with transparency and accurately reflected on the Supplier's business books and records. Information regarding Supplier's labor, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

#### **5) Intellectual Property**

Intellectual property rights are to be respected, transfer of technology and know-how is to be done in a manner that protects intellectual property rights, and customer and supplier information is to be safeguarded.

#### **6) Fair Business, Advertising and Competition**

Suppliers shall understand and comply with all applicable fair business, advertising and competition laws including fair trading and competition laws in the jurisdictions in which they operate.

#### **7) Protection of Identity and Non-Retaliation**

Programs that ensure the confidentiality, anonymity, and protection of supplier and employee whistleblowers are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

#### **8) Responsible Sourcing of Minerals**

Suppliers shall adopt a policy and exercise due diligence on the source and chain of custody of the cobalt, tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organization for Economic Co-operation and Development (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognized due diligence framework. Suppliers should also refer to our Human Rights & Responsible Materials policies for further guidance.

#### **9) Privacy**

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

### **E. E. MANAGEMENT SYSTEMS**

Suppliers must procure goods and services in a responsible manner and in compliance with this code. Suppliers are expected to communicate our requirements throughout their supply chains by adopting processes, policies, procedures, and training to ensure compliance with all applicable laws and promote the standards and expectations set forth in this code. A management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations and products; (b) conformance with this Code;



and (c) identification and mitigation of operational risks related to this Code. This includes the following aspects:

**1) Company Commitment**

Corporate social and environmental responsibility policy statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management, and posted in the facility in the local language.

**2) Management Accountability and Responsibility**

The Supplier clearly identifies senior executive and company representative(s) responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management systems on a regular basis.

**3) Legal and Customer Requirements**

A process to identify, monitor and understand applicable laws, regulations, and customer requirements, including the requirements of this Code.

**4) Risk Assessment and Risk Management**

A process to identify the legal compliance, environmental, health and safety labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

**5) Improvement Objectives**

Written performance objectives, targets, and implementation plans to improve the Supplier's social, environmental, and health and safety performance, including a periodic assessment of Supplier's performance in achieving those objectives.

**6) Training**

Suppliers are expected to communicate and enforce the principles of this code to their supervisors, employees, and suppliers. This includes establishing appropriate training measures to allow managers and employees to gain an appropriate level of knowledge and understanding of this code, the applicable laws and regulations and generally recognized standards.

**7) Supplier Responsibility / Communication**

A process for communicating clear and accurate information about Supplier's policies, practices, expectations, and performance to workers, suppliers, and customers.

**8) Worker Feedback, Participation and Grievance**

Ongoing processes, including an effective grievance mechanism, to assess workers' understanding of, and to obtain feedback on violations against practices and conditions covered by this Code and to foster continuous improvement. Workers must be given a safe environment to provide grievance and feedback without fear of reprisal or retaliation. Suppliers must periodically provide workers with information on all grievance procedures. No retaliation against workers for raising workplace concerns may be tolerated, including personal attacks, intimidation, or other threats against workers.

**9) Audits and Assessments**

Periodic self-evaluations to ensure conformity to legal and regulatory requirements, the content of the Code, and customer contractual requirements related to social and environmental responsibility.

**10) Corrective Action Process**

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations, and reviews shall be implemented.

**11) Documentation and Records**

To ensure and demonstrate compliance with this code, transparency is paramount. Suppliers shall keep records of all relevant documentation in relation to work undertaken for Rea which may be reviewed to verify compliance with this code upon reasonable request.

**Reporting a concern:** In the event that any concern arises, you may contact any one of the following:

- Rod Wilson, Vice President of Supply Chain (260-421-5410)
- Susan Boyd, Vice President of Human Resources (260-421-7343)
- Chris Billingsley, President and Chief Executive Officer (765-477-8045)
- Via mail: Compliance Officer, Rea Magnet Wire Company, 3400 E. Coliseum Blvd., Suite 200, Fort Wayne, Indiana 46805

Reviewed and approved by Rea Leadership Team as of January 01, 2026.