

## SUPPLIER CODE OF CONDUCT

Gleason's Business Principles and Code of Conduct are the foundation of our culture, and it is our culture that is the key enabler to building the very best brand. Gleason conducts business within the requirements of applicable laws and regulations and seeks to establish and confirm the high standards Gleason also expects from its suppliers. Gleason selects suppliers not only based upon excellence in the particular industry, but those business partners that are committed to high business standards aligned with Gleason's ethics and standards. The Gleason Supplier Code of Conduct formalizes these key principles under which suppliers to Gleason Corporation and its global subsidiaries are required to operate. We appreciate the time taken to review the Supplier Code of Conduct and understand the requirements.

### 1 Basis of Collaboration

- This Supplier Code of Conduct is based on the Gleason Corporation Code of Conduct and additionally reflects the principles of the United Nations (UN) Global Compact, OECD Guidelines for Multinational Enterprises, the conventions of the International Labour Organisation (ILO), ISO 26000, ISO 14001, and other applicable international standards.
- Sustainable and socially responsible conduct in business is the basis for all our transactions and provides a universal foundation for good, long-term business relations.
- This Supplier Code of Conduct reflects the high standards that Gleason sets for itself and which it also expects from its suppliers, as an extension of Gleason's value chain.
- This Supplier Code of Conduct applies worldwide to all suppliers of Gleason Corporation and its affiliated companies (collectively "Gleason").
- Our suppliers are expected to uphold at least the standards included in this Supplier Code of Conduct, and to ensure that their governing bodies, employees, suppliers, intermediaries, subcontractors and other business partners are also committed to at least comparable standards.
- Gleason's suppliers are responsible for developing their own compliance programs, procedures, and codes of conduct in order to ensure that the principles set out herein are passed on and promoted in their own supply chains in the best way possible.

### 2 Lawful Conduct

We expect our suppliers to share our commitment to following applicable law in the jurisdictions in which we do business. This includes ensuring compliance throughout the whole supply chain.

- Suppliers must seek to understand the laws applicable in the jurisdictions in which the supplier operates and comply with all applicable national and international laws and other regulations.
- Violations of the law will not be tolerated. Suppliers must alert Gleason to any violations of the law, and material issues with the goods and services they supply to Gleason and remediate any issues of non-compliance.

### 3 Ethical Business Practices, Integrity and Fair Competition

We expect our suppliers to act fairly and with integrity worldwide.

- In the interests of free and fair competition, business practices must be transparent, legitimate and demonstrating proper business etiquette at all times, with particular consideration given to the relevant law on fair competition and cartels.
- The principles of a free market and open and fair competition must be upheld and enforced.
- It is prohibited for suppliers to directly or indirectly cause or otherwise engage in the unlawful obstruction of competition.
- Corruption will not be tolerated in any form, whether it involves offering or accepting bribes, granting or accepting inducements or any other form of undue influence or unlawful advantage.
- With regard to business associates, it is prohibited to offer, promise or accept, directly or indirectly, gifts, invitations or anything of value that is intended to improperly influence someone or gain an improper advantage. Any business courtesies that are extended must be proportionate and reasonable and related to the business being conducted by the parties.
- Suppliers providing gifts, travel, entertainment or invitations to government officials on behalf of Gleason are forbidden.
- Suppliers must not engage in activities that create conflict between the supplier's interests and Gleason's interest. Private, personal interests and business interests must be kept strictly separate. Both actual and apparent conflicts of interest must be avoided.
- Suppliers shall maintain whistleblower confidentiality and prohibit retaliation against employees who make a disclosure or raise a concern about improper conduct by an employee, officer of the supplier, or by a public official or official body related to a supplier or a supplier's business.

#### **4 Protect and Respect Human Rights**

We expect our suppliers to respect human rights and to ensure that they are not complicit in human rights abuses.

- The fundamental rights of all human beings, particularly the dignity and privacy of every individual, must be safeguarded and respected.
- All workers, including without limitation, temporary, migrant, student, and younger works and dispatch workers, as well as direct employees, must be protected against corporal punishment and against physical, sexual, psychological and verbal harassment and abuse.
- Suppliers will not use forced, bonded, indentured, or involuntary prison labor, and will not engage in slavery or trafficking of any person. Suppliers shall ensure workers have access to their personal documentation (including passports, identity papers and travel documents). Workers shall not be required to pay any application, recruiting, hiring, placement, or processing fee.
- All supplier employees shall have the right to freedom of opinion, freedom of association and freedom of assembly as well as the right to enter into collective bargaining in accordance with the relevant national provisions.
- Discrimination, harassment, denigration, or prejudice based on race, origin, gender, gender identity and expression, pregnancy, disability, skin color, sexual orientation,

political or religious convictions, veteran status, age, world view or any other category protected under applicable law, will not be tolerated.

- Objectively unjustified and unlawful unequal treatment is prohibited. The principle of equal opportunities must be upheld. All collaboration must be characterized by mutual respect, appreciation and responsible interaction.
- The use of child labor will not be tolerated in any form. Suppliers must all ensure all workers meet the minimum working age in any region where the supplier operates, in accordance with applicable law. Where permitted under local law to engage younger workers, suppliers must take additional steps to protect the rights and safety of those younger workers and ensure proper record keeping.
- All employees shall be given the freedom to terminate their employment subject to compliance with a reasonable notice period.

## **5 Reasonable Working Conditions, Wages & Benefits and Responsible Sourcing**

We expect our suppliers to adopt a responsible working policy and actively promote health and safety.

- Suppliers must provide a safe and non-hazardous working environment in order to seek to prevent accidents and meet or exceed occupational health and fire safety regulations.
- Health and safety at work is the foundation of all operational processes and must be incorporated into the consideration of technical, economic and social issues.
- A hygienic workplace, access to drinking water, adequate sanitation facilities, regular safety training and emergency preparedness must be standard for all employees.
- Compensation and social benefits must at least comply with applicable laws and statutes in relevant jurisdictions, including those relating to minimum wages, overtime hours, and legally mandated benefits.
- Suppliers must ensure that working hours do not exceed the statutory maximum limits applicable in each particular case. Employees must also be permitted to have adequate breaks and rest periods, and to take holiday/time off, in accordance with the statutory requirements. Suppliers shall comply with applicable laws related to work hours and overtime, where applicable, while providing fair and competitive compensation and benefits.
- Suppliers that manufacture components, parts, or products containing “Conflict Minerals” as defined in the applicable regulations (For example, under the Dodd Frank Act these minerals include tin, tungsten, tantalum and gold) to procure such materials from conflict-free sources and require down-stream supply chain partners to implement similar policies.

## **6 Environmental Protection and Sustainability**

We expect our suppliers to strive to minimize the detrimental environmental impact of their operations, supply chain, products and services, as much as possible towards environmental neutrality.

- Suppliers are expected to evaluate and realize opportunities within their business processes that enable waste prevention, improve environmental stewardship and

promote the efficient use of resources. At a minimum, suppliers must comply with applicable environmental laws and regulations while being able to demonstrate an active improvement process in this regard.

- Suppliers are expected to use water efficiently and to continuously improve on their overall consumption and efficiency of using water while monitoring the overall water consumption. Suppliers are also expected to ensure wastewater generated from operations, industrial processes and facilities are characterized, monitored, controlled and treated as may be required by applicable law prior to disposal.
- Suppliers are expected to use all material resources efficiently and to continuously improve on their overall material consumption and efficiency of using materials. Suppliers are also expected to ensure solid waste generated from operations, industrial processes and facilities are characterized, monitored, controlled and treated as may be required by applicable law prior to disposal while enabling recycling and reuse of solid waste or unused material.
- Air emissions of volatile organic chemicals, greenhouse warming gases (GWG), greenhouse gas emissions, aerosols, particulates, ozone depleting chemicals and combustion by-products generated from operations, industrial processes and facilities are characterized, monitored, controlled and treated as required by local and/or national regulations while being able to demonstrate processes for a continuous improvement of the environmental impact.
- Due to the importance of global warming, the supplier shall monitor and report GWG emissions generated from operations, industrial processes and facilities at minimum on an annual basis. A supplier shall be able to demonstrate an active improvement process for continuously reducing a supplier's GWG footprint towards GWG neutrality including carbon dioxide (CO<sub>2</sub>) to support the respective international and national targets. Suppliers are asked to work with Gleason to identify the supplier's GWG footprint of products and services provided to Gleason, including the respective supply chain impact.
- When dealing with hazardous substances, suppliers must ensure safe handling, movement, storage, re-use and disposal of such substances, aligned with international and national regulations and laws.
- Suppliers shall review and ensure products supplied to Gleason adhere to all applicable laws, regulations, reporting and disclosure requirements, and customer requirements regarding the prohibition or restriction of specific substances and chemical handling, including without limitation REACH, The Stockholm Convention, The Montreal Protocol on Substances that Deplete the Ozone, OSHA, RoHS, TSCA and other applicable regulations. All products must be properly labeled and registered (where required).
- Suppliers shall be able to demonstrate processes and continuous improvements for reducing the environmental impact of their products being utilized or disposed, and their services being performed.
- Suppliers shall consistently pursue the development and distribution of environmentally-friendly and sustainable technologies, products and working environments.
- Suppliers are expected to use energy efficiently and to continuously improve on their overall consumption and efficiency of using energy while monitoring the overall energy consumption. Suppliers are also expected to work towards and to promote using

mainly (and best case entirely) renewable energy resources within their operations, industrial processes and facilities as well as supply chain. For this matter, suppliers shall be able to characterize, monitor, and control the use of energy with at least an annual report.

## **7 Confidentiality, Data Protection and Data Privacy**

We expect our suppliers to safeguard confidential information with the most stringent information protection requirements and demonstrate sensitivity in dealing with data, including personal data.

- Trade and business secrets and confidential information must be handled discretely and confidentially and must not be shared with or made accessible to unauthorized parties.
- The protection of the intellectual property of third parties, or customers of Gleason, which may be required to be shared with a supplier on a case-by-case basis, must also be respected with the supplier using at least the same degree of care it exercises to protect its own confidential information.
- All confidential information must be maintained in confidence and stored properly or as agreed to by Gleason and not altered, copied or misused.
- Suppliers shall protect the privacy expectations of individuals with respect to the access, collection, use, processing, transmission and storage of personal data. Supplier must comply with privacy and information security laws and requirements when personal information is collected, stored, processed, transmitted and shared. Suppliers shall also ensure the security of all business data.

## **8 Compliance with International Trade Law**

We expect our suppliers to ensure global compliance, with any applicable international trade law, including, without limitation, export, customs and tax laws.

- Suppliers are responsible for ensuring compliance with applicable rules on the import, export and transfer of goods, technologies and services and regarding the movement of capital and payments nationally and internationally.
- Suppliers are expected to comply with applicable global sanctions and anti-boycott laws.
- Suppliers must comply with the latest applicable provisions on money laundering and the funding of terrorism.

## **9 Compliance with the Supplier Code of Conduct**

- Our suppliers shall monitor compliance with the principles contained in this Supplier Code of Conduct, striving to prevent, mitigate and remediate issues. Upon Gleason's request on an annual basis, suppliers shall submit a self-declaration or certification to Gleason confirming the supplier's commitment to compliance with the principles contained in this Supplier Code of Conduct and provide all the documentation necessary to substantiate compliance with the standards of this Supplier Code of Conduct as may be reasonably requested. Suppliers shall notify Gleason of any occurrences that are contrary to this Supplier Code of Conduct, when such

occurrence arises. Gleason reserves the right to monitor compliance with the standards of this Supplier Code of Conduct and to request suppliers demonstrate appropriate internal controls, and/or participate in on-site assessments or audits conducted by Gleason or an independent third party designated by Gleason to confirm compliance with the Supplier Code of Conduct.

- Our suppliers must also ensure compliance with the principles of this Supplier Code of Conduct in their own supply chain.
- In the event of a failure to comply with the Supplier Code of Conduct, Gleason reserves the right to require remedial measures and to cease collaboration where necessary.

## **CONTACT INFORMATION**

Any supplier may direct questions or comments about this code of conduct to his/her Supply Management representative.

## **NON-COMPLIANCE REPORTING**

Violations of the Gleason Supplier Code of Conduct can be reported any of the following ways:

Email:      [Legal.department@gleason.com](mailto:Legal.department@gleason.com)

Mail:         Gleason Corporation  
                Attn: Legal and Compliance  
                1000 University Avenue  
                Rochester, NY 14607-1286

## **Modification**

The Company may at any time update, modify or change the information or application of the policies described in this Code as required to meet changing circumstances.

Gleason Corporation, August 2021 v1  
Updated: