



## **PREFORMED LINE PRODUCTS COMPANY SUPPLIER CODE OF CONDUCT**

This Supplier Code of Conduct (the “Code”) addresses Preformed Line Products Company’s (“PLP,” “we,” or “us”) expectation of its Suppliers’ commitment to the honesty, integrity and ethical behavior of the Suppliers’ directors, officers, and employees. This Code governs the actions and working relationships of PLP and its Suppliers. Although the Code does not cover every situation or challenge that arises, it serves as a guide by setting forth the principles governing the behavior of all directors, officers, and employees of the Suppliers. The Suppliers and each of its directors, officers and employees must conduct their business affairs with the highest standards of honesty and integrity, respect the rights of their fellow directors, officers, employees and third parties, and be free from violations of applicable laws. Each director, officer, and employee of the Supplier (as used herein, “you,” or “your”) is always expected to adhere to this Code. PLP reserves the right to disqualify Suppliers suspected or found to be in violation of this Code.

### **A. Introduction**

You shall:

1. Act with honesty and integrity and shall ethically manage all actual or apparent conflicts of interest between personal and professional relationships;
2. Provide information that is full, fair, accurate, timely, and understandable in all reports and documents you provide, including documents in communications made to us;
3. Comply with all laws, rules, and regulations of federal, state, and local governments, and all applicable private or public regulatory agencies;
4. Proactively promote ethical behavior among peers and subordinates in the workplace;
5. Promptly report any violation or suspected violation of this Code to PLP;
6. Act in good faith, responsibly, with due care, competence, and diligence, and not knowingly or recklessly misrepresent facts or allow your independent judgments to be subordinated;
7. Not use confidential information acquired in the course of your work for personal advantage and not buy or sell our securities in violation of the securities laws; and
8. Act responsibly in your use of and control over our assets and resources (if applicable).

### **B. Business Performance**

We seek business relationships based on trust, transparency, and mutual accountability. As such, you shall:

- Compete fairly and ethically for our business;
- Never offer or accept bribes, kickbacks, inappropriate gifts or hospitality, or other improper incentives in connection with our business;

**PLP.COM**



- Refrain from behavior that unlawfully restricts competition, including but not limited to improper exchanges of information and data, pricing arrangements with competitors, bid-rigging, improper customer or territory allocation;
- Avoid any conflict of interest relating to financial interests or other arrangements with our employees that may be considered inappropriate;
- Work with your own suppliers to promote business conduct consistent with the principles in this Code;
- Share our commitment to conducting business honestly and transparently; and
- Honor business obligations and manage unanticipated events in a proactive, timely, and open way.

### **C. Compliance with Laws, Rules, and Regulations**

As a responsible company, we expect you to share our commitment to following the law. As such, you shall:

- Be familiar with and comply with all laws that apply to you and your business;
- Treat legal requirements as a minimum standard; and
- Alert us to any material issues with the goods and services you supply.

### **D. Record Keeping**

We are committed to making responsible business decisions and disclosing truthful and timely information to our stakeholders. To support this, you shall maintain accurate and honest records and provide access to, and copies of, these records upon request, we reserve the right to audit Supplier's compliance with this Code, including but not limited to use of questionnaires, interviews of Supplier's personnel and on-site inspections. This helps us make responsible business decisions and disclose truthful and timely information to our stakeholders. As such, you shall:

- Maintain books and records that reflect all transactions in an accurate, honest, and timely way;
- Never alter any recorded entry to conceal or misrepresent the underlying transaction represented by it;
- Employ appropriate quality audit and compliance processes for matters such as product safety, worker health and safety, and labor and employment;
- Disclose, on request, the location of facilities and known origins of materials to enable traceability; and
- Reduce and/or eliminate reliance upon materials from Conflict zones.



#### **E. Confidential Information**

You shall maintain the confidentiality of proprietary information entrusted to you by us, except where disclosure is expressly authorized or permitted by such party or required by law. Proprietary information includes all non-public information (regardless of the source) that may be useful to competitors or harmful to us if disclosed. All non-public information about us should be considered confidential and you cannot disclose or use any information for your personal benefit.

#### **F. Respect**

You shall stand with us in prioritizing the safety, well-being, and dignity of all individuals, whose talents and hard work help us deliver our products and services. As such, you shall:

- Provide safe and healthy working conditions at all of your operations;
- Never use or tolerate the use of human trafficking, forced labor, or child labor;
- Foster an inclusive work environment that is free of harassment and discrimination;
- Treat employees, customers and suppliers with dignity and respect, and not threaten or use physical, sexual, psychological, or verbal abuse;
- Respect employees' rights to organize and bargain collectively; and
- Meet or exceed all legal requirements for compensation and working conditions.

#### **G. PLP Property/Assets**

You shall protect our reputation and any information or property we entrust to you. As such, you shall:

- Protect any of our confidential information to which you have access, including its intellectual property, trade secrets, or financial information and limit access to such information to those of Supplier's personnel who have a legitimate business need for such information;
- Safeguard any property belonging to us while under their control; and
- Avoid any situations that may adversely affect our business interests or reputation.



## **H. Environment**

Environmental considerations are an integral part of our business practices.

- You shall maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- You shall comply with regulated substance and product content specifications and with any applicable laws prohibiting or restricting the use, content or handling of specific substances, including, but not limited to RoHS, WEEE, REACH, California Prop. 65 and other similar Laws. You shall provide any information relative to the foregoing, including, but not limited to, Material Declarations, as applicable, to us.
- You shall minimize environmental pollution and make continuous improvements to reduce or eliminate solid waste, wastewater, and air emissions by implementing appropriate conservation measures in their production, maintenance, and facility processes.
- You shall manage, control, treat and/or dispose of non-hazardous solid waste, wastewater, and/or air emissions generated from operations as required by applicable Laws, before discharge.

## **I. Ethics and Compliance**

You shall commit to the highest standards of ethical conduct when dealing with your employees, officers, directors, suppliers, customers, and other relevant stakeholders.

- You shall accurately record and disclose information regarding its business activities, structure, financial situation, and performance in accordance with applicable laws as well as prevailing industry business practices.
- You shall prohibit any forms of fraud, extortion, theft, or embezzlement.
- You shall respect intellectual property rights, not commit any form of infringement and safeguard our information. Transfer of technology and know-how shall be done in a manner that protects intellectual property rights.
- You shall implement processes and procedures and exercise due diligence to detect and avoid supplying counterfeit parts.
- We are committed to ensuring that the products it sells do not incorporate “conflict minerals” (minerals which are smelted into tin, tantalum, tungsten, and gold) sourced from entities which directly or indirectly finance conflict in the Democratic Republic of Congo or adjoining countries. As such, you shall:
  - Perform sufficient due diligence into your supply chains to determine whether products sold or provided to us contain tin, tantalum, tungsten, or gold, and, if so, whether and to what extent those metals are sourced from conflict-free smelters;



- Report the results of such due diligence to enable to comply with our legal obligations and policy goals; and
- Commit to being or becoming “conflict-free,” so that any such metals are sourced only from conflict-free smelters.
- You shall implement processes to address the confidentiality and protection of an employee who in good faith raises a concern, makes a report, or assists with an investigation related to potential ethical or criminal violations.

If you have any concerns or questions regarding this policy, please contact the legal department at the information below:

Carrie Vaccariello  
General Counsel and Corporate Secretary  
Preformed Line Products Company  
660 Beta Drive  
Mayfield Village, Ohio 44143  
Phone: 440.473.9287  
Fax: 440.473.9175  
E-mail: [carrie.vaccariello@plp.com](mailto:carrie.vaccariello@plp.com)

PLP.COM