

GLOBAL SUPPLIER CODE OF CONDUCT

This Global Supplier Code of Conduct should guide the actions of all Wilsonart Suppliers. It is understood that the term “Suppliers” covers any natural person or legal entity providing services or supplying other goods, as well as Suppliers that provide services to Wilsonart that are directly related to obtaining, retaining or facilitating business, or for the conduct of matters relating to Wilsonart, including, without limitation, any supply chain partners, consultants, resellers, contractors, and other professional service providers.

Wilsonart is committed to working in partnership with our Suppliers to follow a code of conduct in the areas of employee labor conditions, health & safety, environmental management, business ethics, and corporate social responsibility. We have updated our policies to simplify communications about Wilsonart values and how they extend to our Suppliers.

Background: Our purpose is to build a better working world. To stay true to that purpose, we will continue to enhance the way we engage with our Suppliers to encourage the continual improvement of the way we, and our supplier base, address and manage important issues. Our revised expectations and minimum standards within the enclosed document are the product of not only the increasing regulatory environment globally with respect to particular issues, but also the increasing expectations of our customers and the wider community.

Wilsonart values our supplier relationships and is committed to working with, and supporting, our Suppliers to achieve mutual objectives. A Supplier’s performance and adherence to high business standards is an important and integral part of the value chain for Wilsonart. Wilsonart promotes and expects the application of high legal, ethical, environmental, and employee-related standards within our own business and among our Suppliers.

Our commitment to integrity and professionalism is set forth in our Global Supplier Code of Conduct, which provides a clear set of standards for all of our business conduct. We believe that deviations from, or violations of, the Global Supplier Code of Conduct are unacceptable, and that our customers or Suppliers should feel able to raise issues without any fear of retaliation or discrimination.

The minimum standards of business conduct that we expect from all of our Suppliers are as follows:

- 1. Compliance with laws:** Suppliers shall comply fully with all laws and regulations applicable to them.



2. Ethics: The highest standard of integrity is expected in all of our business dealings. Any and all forms of corruption, extortion, bribery (including facilitation payments), and embezzlement are strictly prohibited and may result in immediate termination and legal action:

2.1 Suppliers will not offer or provide money or anything of value to any person if the circumstances indicate that it is probable that all or part of the money or other thing of value is being given to another individual or entity to influence official action or to obtain a business advantage.

2.2 Suppliers are expected to understand relevant Wilsonart gift and hospitality policies before offering or providing Wilsonart personnel with any gift and/or business entertainment. Gifts or entertainment should never be offered to Wilsonart personnel or representatives under circumstances that create the appearance of impropriety.

2.3 Suppliers must comply with all applicable trade and control laws and regulations in the import, export, re-export or transfer of goods and services (including software and technology). All invoices and any customs or similar documentation submitted to Wilsonart or governmental authorities in connection with transactions involving Wilsonart must accurately describe the goods and services provided and the price thereof.

2.4 Suppliers shall not share or exchange any prices, costs, or other competitive information, or undertaking of any collusive conduct with any other third party to Wilsonart in respect to any proposed, pending or current Wilsonart procurement.

2.5 Suppliers will use only subcontractors or other third parties who comply with all applicable laws and regulations, and who adhere to the same (minimum) standards set forth in this guide.

3. Labor Management: Policies should be in place to confirm the Supplier's commitment to points 3.1-3.13, and improvement programs should be in place where relevant:

3.1 Freedom from forced labor, bonded labor, and human trafficking:

All employment shall be voluntary and freely chosen by the worker. Workers shall be free to leave their employment at any time (subject to reasonable and paid notice periods) and shall not be subject to any coercion or restriction through, for example, the holding of original copies of employee passports, identity documents, or monetary deposits. Suppliers, and their subcontractors, must make full disclosure to workers about the terms and conditions of their employment.



There shall not be any use of bonded labor. Work must be undertaken for fair compensation and must not be undertaken to repay a debt incurred (i.e., as a result of deceptive recruiting practices).

Suppliers, and their subcontractors, are prohibited from utilizing forced or compulsory labor, whether in the form of slave, prison, indentured, or bonded labor, and from permitting the trafficking of persons for the purposes of forced or compulsory labor.

3.2 Recruitment agencies: Where recruitment agencies/brokers are used by a Supplier, appropriate due diligence and ongoing management must be undertaken to ensure that risks of worker exploitation, such as debt bondage, are effectively mitigated. Suppliers must also ensure that no fees or costs have been charged directly or indirectly, in whole or in part, to job-seekers and workers for services directly related to recruitment or job placement. For example, to obtain employment, workers must not be required to pay the employer's or the employer's agents' recruitment fees or other similar fees that are not the legal responsibility of the worker. Supplier and their subcontractors must also ensure that third-party recruitment agencies (including labor brokers) satisfy the requirements set forth in this Policy. To the extent that a Supplier or a subcontractor uses workers that are employed through an agency, the Supplier, and their subcontractors, must ensure that the agency complies with all applicable labor laws and regulations. Reasonable evidence of these activities is to be available to Wilsonart upon request, within a reasonable notice period.

3.3 Child labor: Suppliers should adhere to local laws relating to the minimum working age and not engage in the employment of child labor, directly or indirectly.

3.4 Wages and benefits: At a minimum, the legal minimum wage standard must be adhered to across the entire workforce, employees should receive clear information on their wages, and unfair deductions from wages as a disciplinary measure are not permitted.

3.5 Working hours: Working hours must be limited according to national or local law, including breaks. Overtime should be voluntary, should not replace regular employment and must be fairly compensated.

3.6 Freedom of association, collective bargaining, or parallel means: Employees have the right to join or form a trade union without facing discrimination or intimidation. Where freedom of association and collective bargaining is restricted under law, employees should have the right to develop parallel means.

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3.7 Health and safety and working conditions: A safe and hygienic working environment should be provided with an awareness of any industry-specific hazards. Relevant training should be provided to employees.

3.8 Regular employment: All employees should be provided with a written document setting out their terms and conditions in accordance with the relevant local jurisdiction. We expect all employment and the termination of employment to be carried out in a fair manner.

3.9 No harsh or inhumane treatment: Abuse, threat of abuse, and sexual or other harassment or intimidation must be prohibited by Suppliers. Suppliers shall make available to all workers within their operations and supply chain a mechanism for which grievances relating to labor practices can be anonymously raised, without fear of retribution. Suppliers shall investigate and take appropriate action to remedy all grievances raised.

3.10 Subcontracting: Where authorized subcontracting is used to support the execution of services for Wilsonart, the supplier shall confirm that the subcontractor meets the minimum expectations set out in Section 3 of this document through the following controls:

- Supplier shall take necessary steps to obtain and maintain visibility over labor rights risks within the operations and supply chains of subcontractors.
- Supplier shall attain the right to audit over subcontractor operations.
- Records of audits undertaken of subcontractors shall be available on request.
- Supplier shall have written agreements in place with subcontractors to ensure that any further subcontracting by the subcontractor company (a) is authorized, and (b) meets the standards set out in this document.

3.11 Right to audit: Suppliers shall attain the right to audit their suppliers to assess the working conditions and extent to which workers' rights are being upheld. Records of audits undertaken of the Suppliers' supply chain shall be available on request.

3.12 Incident Response: Suppliers shall take the following actions, at a minimum, when an incident of forced labor, bonded labor, human trafficking or child labor is identified:

- Disclosing the incident/high risk to relevant authorities.
- Disclosing the incident/high risk to Wilsonart.
- Taking appropriate actions to remedy the incident.

3.13 Demonstration of reasonable modern slavery due diligence: Wilsonart expects that our Suppliers will maintain an active view on the inherent risk of modern slavery in their supply chain



(this includes third-party certifications in relation to human rights and social compliance standards). Among other modes of inquiry, we would expect this to include engaging human rights specialists to perform validation audits of high-risk suppliers on an intermittent, but no less than annual, basis.

In addition to the above minimum requirements, a Supplier shall define a minimum standard of human rights that applies across all jurisdictions and demonstrate how compliance to this is encouraged and observed. Such standards should refer to, at a minimum, the UN Guiding Principles on Business and Human Rights.

4. Diversity and inclusiveness: Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the principles of diversity and inclusiveness (incorporating equal opportunities) in that they will seek to ensure that Suppliers do not victimize, harass, or discriminate against any employee or party to the contract due to their sex, gender identity/expression, marital or civil partnership status, race, ethnicity or national origin, disability, religion, sexual orientation, age, or part-time status. Suppliers will be required to meet the requirements of any applicable discrimination legislation. Our Suppliers will be treated fairly and equally during the tendering and purchasing process, with decisions made on the basis of clear selection criteria:

4.1 Wilsonart expects Suppliers to have a policy that explicitly bans discrimination/bullying and harassment based on sexual orientation, race, gender identity/expression. In addition, Suppliers are also encouraged to have evidence of diversity and inclusiveness training that is inclusive of sexual orientation and gender identity/expression.

4.2 It is our expectation that all Suppliers use efforts to procure diverse businesses to compete for goods and services to become preferred Suppliers to the supplier and/or as its subcontractor(s). In accordance with the terms of its agreement with a Wilsonart entity, Suppliers commit to comply with all relevant regulatory agency requirements, as well as with any local diversity regulations and programs.

4.3 It is our commitment that diverse business enterprises shall have equal opportunity to compete for all goods and services to become preferred Suppliers and/or subcontractor(s) for the organization. Wilsonart is committed to the development and growth of diverse business enterprises to build a better working world and to expand networks to build trusted and enriched relationships.

4.4 Wilsonart expects Suppliers to have equivalent policies to promote diversity in their supply chains and purchase from diverse businesses. Suppliers agree to make a reasonable effort to utilize diverse suppliers and provide evidence to Wilsonart upon request.



5. Environmental sustainability: Wilsonart expects its Suppliers to demonstrate a clear understanding of the environmental risks, impacts, and responsibilities associated with the products and services they provide:

5.1 Suppliers should have in place an effective environmental policy, statement or program to mitigate environmental risks, the implementation of which should be evident throughout all levels of the company.

5.2 Suppliers should have processes in place to ensure that their operations conform to all applicable environmental legislation. All required environmental permits, approvals and registrations are to be obtained, maintained, and complied with in accordance with the conditions and requirements defined therein.

5.3 Environmental performance should be measured, monitored and reviewed regularly. Suppliers should endeavor to make continuous improvements in environmental performance through practicable measures and employ leading practices where possible.

5.4 Suppliers should make practical efforts to minimize the use of energy, water and raw materials. Where possible, these should be renewable or sustainably sourced.

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

5.6 Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting substances, greenhouse gas emissions, and combustion by products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to the discharge according to local laws and regulations. Suppliers shall conduct routine monitoring of the performance of their air emissions control systems.

5.7 Suppliers shall make practical efforts to eliminate or reduce levels of generated waste and should renew or recycle waste materials wherever possible. The handling, storage, movement, treatment, and disposal of all waste must be carried out in accordance with applicable regulations and in an environmentally responsible manner.

5.8 Suppliers should consider the environmental credentials and performance of vendors within their own supply chain and require them to operate to a minimum set of standards.



5.9 Products and services provided to Wilsonart should include options that offer reduced environmental impact by utilizing environmentally sound technologies, processes and sustainable materials, etc.

6. Governance: Wilsonart may conduct annual compliance surveys to confirm compliance with this Global Supplier Code of Conduct. However, Wilsonart expects that Suppliers will actively audit and monitor their day-to-day management processes with respect to the Global Supplier Code of Conduct and provide evidence to Wilsonart upon request.

Doing business with Wilsonart means that the Supplier acknowledges Wilsonart's Global Supplier Code of Conduct and commits to doing business with Wilsonart according to these terms. Wilsonart reserves the right to terminate its business relationship with any Supplier who is unwilling to comply with this Global Supplier Code of Conduct.

Effective January 2025

