

Code of Conduct & Ethics

Gexpro® Services

Powerful Supply Chain Solutions

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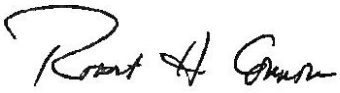
A Message from Leadership

At Gexpro Services, how we conduct business is as important as what we achieve. Our reputation is built on integrity, accountability, and respect for our employees, partners, and communities.

This Code of Conduct & Ethics defines the standards that guide our decisions and actions across all aspects of our business. Each of us is responsible for upholding these principles, acting with integrity, and speaking up when something does not seem right.

We are committed to treating all individuals with dignity and fairness. We strictly prohibit forced labor, child labor, human trafficking, modern slavery in all its forms, discrimination, harassment, retaliation, and workplace violence. We promote a workplace culture that supports diversity, inclusion, equal opportunity, and professional conduct.

By living these values every day, together we protect our people, strengthen our company, and earn the trust placed in us by our customers, suppliers, communities, and other stakeholders.



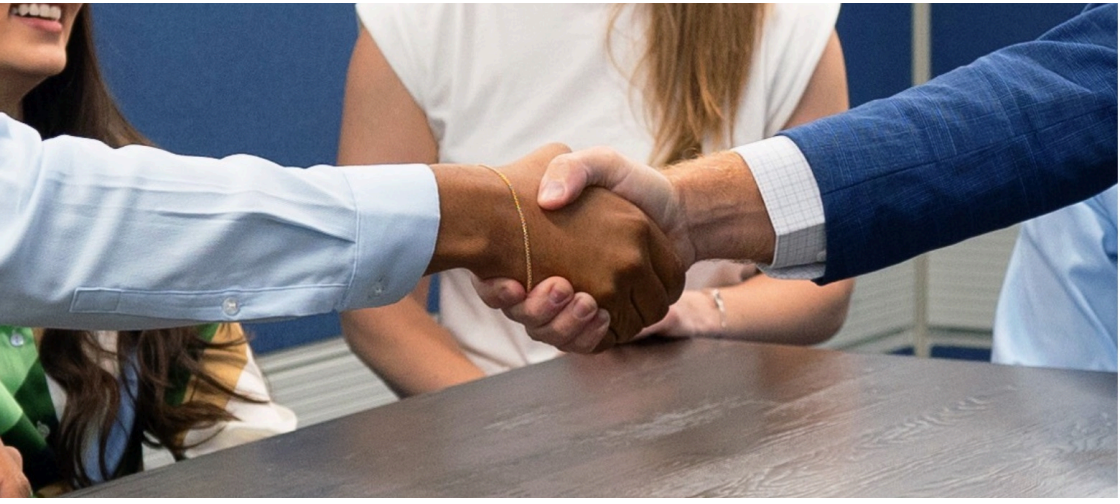
Robert Connors
Chief Executive Officer

1. Purpose and Commitment

Gexpro Services is committed to conducting business with integrity, transparency, accountability, and respect for people and the environment. This Code of Conduct & Ethics (the "Code") establishes not only the principles that guide our behavior, but also the way in which those principles are implemented, monitored, and continuously improved across our organization.

Our approach supports long-term, sustainable value creation for our customers, employees, suppliers, communities, and other stakeholders. It is aligned with internationally recognized standards, including the United Nations Global Compact, the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidance, the Responsible Business Alliance (RBA) Code of Conduct, and evolving ESG regulatory expectations.

As a subsidiary of Distribution Solutions Group (DSG), Gexpro Services operates in alignment with the DSG Code of Conduct. Where this Code establishes additional or more specific expectations reflecting our operational footprint or risk profile, those expectations apply in addition to DSG requirements. In all cases, the highest standard of ethical conduct governs. These commitments are supported by Legal, Compliance, and executive leadership and are embedded into enterprise strategy and decision-making.



2. Scope and Applicability

This Code applies globally to all employees, officers, directors, contractors, and temporary workers acting on behalf of Gexpro Services. Compliance with this Code is a fundamental condition of employment or engagement.

Employees are expected not only to comply with the requirements set forth in this Code, but also to exercise sound judgment, participate in training and awareness activities, and actively contribute to a culture of integrity and accountability. Oversight of applicability and adherence is supported by Human Resources and Compliance functions and is integrated into workforce lifecycle processes.

3. Governance, Accountability, and Management Approach

Gexpro Services maintains a structured governance and management approach designed to ensure that ethical, legal, environmental, and human rights risks are effectively identified, managed, and addressed.

The Board of Directors and senior leadership provide oversight of ethics, compliance, and ESG-related risks, reinforcing that business performance must never be achieved at the expense of ethical conduct. Leaders are responsible for setting the tone at the top, embedding ethical considerations into decision-making, and ensuring that appropriate resources, controls, and escalation mechanisms are in place.

At an operational level, the Company applies risk-based processes to identify and assess potential impacts and risks, integrate findings into business practices, and implement appropriate mitigation and prevention measures. These processes are supported by internal policies, training programs, and functional controls across the organization.

Gexpro Services also maintains mechanisms to monitor the effectiveness of its ethics and compliance framework. These include periodic internal reviews, monitoring activities, and, where appropriate, audits and performance tracking. Where issues are identified, the Company takes corrective action and uses those

insights to strengthen processes and drive continuous improvement. These processes are supported by Legal, Compliance, Internal Audit, and operational leadership and are embedded into core business operations and governance routines.

4. Ethical Foundations and Decision-Making

Gexpro Services expects all employees to act lawfully, ethically, and responsibly in all business activities. This includes complying with applicable laws and regulations, acting with integrity and fairness, and avoiding conduct that could harm the Company's reputation or stakeholder trust.

Employees are expected to exercise sound judgment in their day-to-day responsibilities. When faced with uncertainty, individuals should consider whether a decision is consistent with both the letter and spirit of this Code, whether it reflects our values, and whether it would withstand internal or external scrutiny. Seeking guidance is expected where questions arise. Guidance and escalation channels are supported by Legal and Compliance and are integrated into routine business decision-making processes.

When faced with a decision or uncertainty, pause and ask yourself:

- Is this action legal, ethical, and socially responsible?
- Does it comply with the spirit and the letter of this Code and applicable DSG policies?
- Would it withstand internal or external scrutiny?
- Would Gexpro Services and DSG be comfortable if the decision became public?

5. Human Rights, Labor Practices, and Workplace Conduct

Gexpro Services is committed to respecting internationally recognized human rights and ensuring that all individuals are treated with dignity and respect.

The Company strictly prohibits forced labor, child labor, human trafficking, modern slavery in all its forms, discrimination, harassment, retaliation, and workplace violence. We promote a workplace culture that supports diversity, inclusion, equal opportunity, and professional conduct.

Gexpro Services operates in compliance with applicable labor laws and is committed to fair employment practices, including appropriate wages, working hours, and the protection of legally recognized rights to freedom of association and collective bargaining. The Company complies with applicable equal employment opportunity, affirmative action, and employment-related regulatory requirements in jurisdictions where it operates.

To support these commitments, the Company maintains processes to identify and address human rights risks within its operations. These may include risk assessments, integration of human rights considerations into management practices, employee training, and remediation processes where impacts occur. Human rights considerations are also extended to the Company's value chain through supplier due diligence and the Supplier Code of Conduct. These activities are supported by Human Resources, Legal, and Compliance and are integrated into workforce management and operational oversight processes.



6. Health, Safety, and Environmental Responsibility

Gexpro Services is committed to protecting the health and safety of its employees and minimizing the environmental impact of its operations.

The Company maintains workplace practices and controls designed to identify hazards, prevent injuries and occupational illnesses, and ensure compliance with applicable health and safety regulations. Employees are expected to follow established procedures, participate in training, and promptly report unsafe conditions or incidents. Lessons learned from incidents are used to strengthen controls and prevent recurrence.

In parallel, Gexpro Services takes a proactive approach to environmental responsibility. The Company works to comply with environmental laws and permit requirements, while also monitoring key environmental impacts such as energy use, emissions, and waste generation. Processes are in place to prevent and respond to environmental incidents where relevant.

Where appropriate, Gexpro Services establishes environmental performance objectives, including greenhouse gas reduction goals, and tracks progress over time as part of its broader sustainability commitments, with performance tracked through internal monitoring and review activities. These programs are supported by EHS, Operations, and Compliance functions and are embedded into operational planning and performance management.

7. Business Ethics, Integrity, and Conflicts of Interest

Integrity is fundamental to how Gexpro Services conducts business. The Company maintains clear expectations to prevent unethical or unlawful conduct.

Bribery, corruption, facilitation payments, and kickbacks are strictly prohibited. Employees must comply with all applicable anti-corruption and competition laws and are expected to act honestly and transparently in all business dealings.

Gifts and entertainment may only be offered or accepted when they are modest, appropriate, and not intended to influence business decisions. Employees must remain vigilant in identifying and avoiding situations that could create actual or

perceived conflicts of interest, and must disclose such situations promptly. These requirements are supported by Legal and Compliance and are integrated into commercial processes and approval controls.

8. Data Protection, Confidentiality, and Responsible Technology Use

Gexpro Services recognizes the importance of protecting information and maintaining trust with customers, employees, and business partners.

Employees are responsible for safeguarding confidential, proprietary, and personal information and for ensuring that such information is used only for legitimate business purposes. Compliance with applicable data protection and privacy laws is required at all times, along with adherence to Company policies governing data handling and cybersecurity.

The Company expects responsible use of technology, including artificial intelligence and digital tools. Such technologies must not be used in a manner that compromises data security, circumvents established controls, or replaces necessary human judgment in decisions involving legal, ethical, or safety considerations. These controls are supported by IT, Information Security, Legal, and Compliance and are embedded into system design and business usage protocols.



9. Suppliers and Value Chain Responsibility

Gexpro Services extends its commitment to ethical, environmental, and human rights standards throughout its value chain. Suppliers and business partners are expected to operate in a manner consistent with this Code and the Gexpro Services Supplier Code of Conduct.

Employees involved in procurement or supplier management play an important role in implementing these expectations. This includes supporting supplier due diligence activities, participating in risk assessments, monitoring supplier performance where appropriate, and escalating concerns when issues are identified.

The Company applies a risk-based approach to supplier management, including contractual expectations, engagement, and corrective action processes where necessary. These activities are supported by Procurement, Legal, Compliance, and operational leadership and are embedded into sourcing and supplier management processes.

10. Speaking Up and Non-Retaliation

Gexpro Services promotes a culture in which employees feel comfortable raising concerns and asking questions.

Employees are encouraged and expected to report suspected violations of this Code or other misconduct through available channels, including management, Human Resources, Legal or Compliance, or the Ethics Hotline. Reports may be made confidentially where permitted by law.

Questions or concerns may also be reported through EthicsPoint at **gexproservices.ethicspoint.com**.

The Company strictly prohibits retaliation against any individual who raises a concern in good faith. All concerns are taken seriously and reviewed appropriately. These processes are supported by Compliance, Legal, and Human Resources and are embedded into investigation and case management procedures.



11. Investigations and Corrective Action

Allegations of misconduct are reviewed promptly, impartially, and, where appropriate, confidentially. Gexpro Services takes a structured approach to investigating concerns and determining appropriate outcomes.

Where violations are substantiated, the Company implements corrective actions that may include disciplinary measures, process improvements, or remediation of impacts. Lessons learned from investigations are used to strengthen controls and prevent future occurrences. These activities are supported by Legal, Compliance, Human Resources, and Internal Audit and are integrated into governance and control improvement processes.

12. Training, Awareness, and Accountability

Gexpro Services supports ongoing awareness and capability building through training and communication. Employees are required to complete periodic training on ethics, compliance, and relevant ESG topics and to acknowledge their understanding of this Code. Training reinforces the expectations set forth in this Code, including the Company's commitment to ethical conduct as communicated by executive leadership.

Managers play a key role in reinforcing expectations, promoting ethical behavior, and ensuring that team members understand their responsibilities. Accountability for compliance with this Code is integrated into employee performance and conduct expectations. These programs are supported by Human Resources and Compliance and are embedded into talent management and performance systems.

13. Continuous Improvement

Gexpro Services is committed to continuously strengthening its ethics, compliance, and ESG practices. This includes regularly reviewing and updating this Code, enhancing policies and controls, and aligning with evolving legal requirements and stakeholder expectations.

The Company views ethical conduct and responsible business practices as dynamic, requiring ongoing evaluation and improvement to address emerging risks and opportunities. Continuous improvement efforts are supported by cross-functional leadership and are embedded into strategic planning and governance cycles.



One Partner,
Infinite Solutions.