

Supplier Code of Conduct

Gexpro® Services

Powerful Supply Chain Solutions

Contents

A Message from Leadership 3

1. Introduction and Scope 4

2. Legal Compliance 5

3. Labor and Human Rights 6
   - 3.1 Forced Labor 6
   - 3.2 Child Labor 7
   - 3.3 Working Conditions 7
   - 3.4 Non-Discrimination 7
   - 3.5 Freedom of Association 7
   - 3.6 Health and Safety 7

4. Environmental Requirements 8
   - 4.1 Environmental Compliance 9
   - 4.2 Hazardous Substances and Product Compliance 9
   - 4.3 Waste and Emissions 9
   - 4.4 Climate and Natural Resources 9

5. Business Ethics 10
   - 5.1 Anti-Corruption 10
   - 5.2 Gifts and Hospitality 10
   - 5.3 Fair Competition 10
   - 5.4 Confidentiality 10
   - 5.5 Data Protection and Cybersecurity 10
   - 5.6 Responsible Use of Artificial Intelligence and Technology 10
   - 5.7 Responsible Sourcing of Minerals 11

6. Supply Chain Responsibility 11

7. Compliance and Monitoring 12

8. Reporting Concerns 12

9. References 13

A Message from Leadership

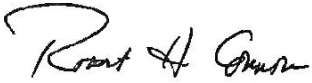
At Gexpro Services, we are committed to conducting business responsibly, ethically, and transparently across our global supply chain. How our suppliers conduct business is an extension of how we conduct business.

This Supplier Code of Conduct defines the standards and expectations that guide our relationships with suppliers and business partners. We expect our suppliers to operate with integrity, comply with applicable laws, and uphold the principles outlined in this Code.

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 expect suppliers to provide safe and healthy working conditions and to promote diversity, inclusion, equal opportunity, and professional conduct.

Compliance with this Code is a condition of doing business with Gexpro Services. We expect our suppliers to identify, prevent, and address risks related to human rights, labor practices, environmental stewardship, and ethical business conduct. We are committed to working collaboratively with our suppliers to strengthen ethical, social, and environmental performance through risk-based due diligence and continuous improvement.

By upholding these standards together, we protect workers, strengthen our supply chain, and earn the trust placed in us by our customers, communities, and other stakeholders.



Robert Connors
Chief Executive Officer

1. Introduction and Scope

GS Operating, LLC dba Gexpro Services (“Gexpro Services”), conducts business with integrity and expects the same from its suppliers. This Supplier Code of Conduct outlines the minimum standards required for doing business with Gexpro Services. This Supplier Code of Conduct is consistent with and supports the broader ethics and sustainability standards of Distribution Solutions Group, Inc.

This Code of Conduct (“Code”) for Suppliers, Contractors, and Vendors outlines our minimum standards applicable to all suppliers regarding the workplace standards and business practices of our suppliers, their parent entities, subsidiaries, affiliates, subcontractors and others who are within their supply chain (“Supplier”). The standards and expectations contained in this Code are factors essential to our decision whether to enter new or extend existing business relationships. Each supplier is responsible for ensuring that its employees, representatives, and subcontractors understand and comply with this Code. The standards and expectations outlined in this Code are intended to supplement, not replace, specific requirements in contracts. If a contractual term is stricter than this Code, the supplier must meet the stricter contractual requirement. This Code does not alter contractual terms or constitute express or implied contractual obligations or a contract of employment.



Gexpro Services operates in a global environment and honors the laws and treaties of the countries in which we operate. Therefore, this Code is focused on principles that uphold consistent compliance obligations throughout our global operations. Suppliers are expected to comply with all laws and treaties of the countries in which they operate. To this extent, within the scope of such compliance, where local or regional laws are less restrictive than the principles of this Code, we expect our Suppliers to follow this Code. Conversely, when local or regional laws are more restrictive than this Code, we expect our suppliers to follow the local or regional laws.

Gexpro Services applies its ethical, human rights, environmental, and governance commitments through different mechanisms appropriate to employees and business partners. Internal impacts are managed through Company governance, policies, training, and controls, while supplier-related risks are addressed through contractual expectations and risk-based due diligence, as reflected in this Supplier Code of Conduct.

This Code is informed by internationally recognized frameworks, including the UN Global Compact, the OECD Due Diligence Guidance for Responsible Business Conduct, the UN Guiding Principles on Business and Human Rights, the Responsible Business Alliance (RBA) Code of Conduct, and applicable sustainability reporting expectations such as the EU Corporate Sustainability Reporting Directive (CSRD).

2. Legal Compliance

Suppliers must comply with all applicable laws and regulations in the countries where they operate, including those relating to:

- Labor and employment
- Health and safety
- Environmental protection
- Anti-corruption, competition, and trade compliance
- Data protection and privacy

Suppliers must comply with all applicable laws and regulations in the countries where they operate. Where applicable laws establish higher standards than this Code, those laws shall apply.

3. Labor and Human Rights

Suppliers shall respect internationally recognized human rights and provide fair working conditions. The labor and human rights provisions of this Code are informed by the ILO Declaration on Fundamental Principles and Rights at Work and relevant ILO conventions. Suppliers shall establish reasonable processes to identify, assess, prevent, mitigate, and remediate actual or potential adverse human rights impacts associated with their operations and supply chains, in line with the UN Guiding Principles on Business and Human Rights and OECD Due Diligence Guidance.

Where heightened risks are identified (e.g., through geographic risk screening, industry risk indicators, or supplier risk assessments), Suppliers shall apply enhanced due diligence measures. Suppliers shall provide or cooperate in remediation where they have caused or contributed to adverse human rights impacts. These processes may include periodic human rights risk assessments, integration of findings into procurement or operational decisions, implementation of mitigation measures, tracking of outcomes, and transparent communication where appropriate. Where suppliers have caused or contributed to adverse impacts, they are expected to remediate or participate in remediation. Where impacts are directly linked through business relationships, suppliers are expected to use appropriate leverage to prevent or mitigate harm.

3.1. Forced Labor

All work must be voluntary. Suppliers shall not use forced, bonded, or involuntary labor, including modern slavery or human trafficking. Workers shall not be required to surrender identity documents, deposits, or other personal property, and shall be free to terminate employment in accordance with applicable law.

Reference: ILO Conventions 29 and 105

3.2. Child Labor

Suppliers shall not employ workers below the legal minimum age.

Reference: ILO Conventions 138 and 182

3.3. Working Conditions

Suppliers shall comply with applicable laws regarding wages, working hours, and overtime.

Suppliers shall respect the right of workers to earn a living wage where minimum wages are insufficient to meet basic living needs.

Reference: ILO Conventions 1, 30, and 131

3.4. Non-Discrimination

Suppliers shall not discriminate based on age, race, gender, religion, nationality, sexual orientation, disability, or other protected characteristics.

Reference: ILO Conventions 100 and 111

3.5. Freedom of Association

Suppliers shall respect employees' rights to freedom of association and collective bargaining, where such rights are permitted by law and in accordance with applicable legal frameworks.

Reference: ILO Conventions 87 and 98

3.6. Health and Safety

Suppliers shall provide a safe and healthy working environment and take appropriate measures to prevent accidents and injuries, consistent with applicable occupational health and safety laws. Suppliers shall implement appropriate occupational health and safety management systems and provide regular training to employees.

Reference: ILO Conventions 155 and 187



4. Environmental Requirements

Suppliers shall comply with applicable environmental laws and regulations and operate in an environmentally responsible manner.

Suppliers shall identify, monitor, and manage their environmental impacts and are encouraged to implement an environmental management system (such as ISO 14001 or equivalent).

Where relevant, Suppliers shall maintain procedures to prevent and respond to environmental incidents and emergencies.

Where relevant, Suppliers are encouraged to establish and track greenhouse gas emissions reduction goals and to monitor and report progress, consistent with applicable regulatory expectations and internationally recognized standards.

Environmental impacts arising from Gexpro Services' own operations are managed through Company environmental policies, compliance programs, operational controls, and employee training, while environmental risks associated with suppliers are addressed through contractual expectations, supplier engagement, and risk-based monitoring, as reflected in this Supplier Code of Conduct.

4.1. Environmental Compliance

Suppliers shall obtain and maintain all required environmental permits and approvals.

4.2. Hazardous Substances and Product Compliance

Suppliers shall comply with applicable product and chemical regulations, including where relevant:

- REACH (Registration, Evaluation, Authorization and Restriction of Chemicals)
- RoHS (Restriction of Hazardous Substances)

Suppliers shall ensure that products delivered to Gexpro Services meet applicable regulatory requirements.

4.3. Waste and Emissions

Suppliers shall manage waste, emissions, and hazardous materials in accordance with applicable laws. Where relevant, Suppliers are encouraged to measure and reduce greenhouse gas emissions, energy consumption, water use, and waste generation, and to implement continuous improvement initiatives.

4.4. Climate and Natural Resources

Suppliers are encouraged to support climate change mitigation and adaptation efforts, responsible use of natural resources, and protection of biodiversity, where relevant to their operations.

5. Business Ethics

Suppliers shall conduct business with integrity.

5.1. Anti-Corruption

Suppliers shall not engage in bribery or corruption in any form. Suppliers shall maintain policies and controls to prevent bribery, corruption, fraud, and conflicts of interest.

5.2. Gifts and Hospitality

Suppliers shall not offer gifts, entertainment, or anything of value to Gexpro Services employees or representatives for the purpose of influencing business decisions, except as permitted by applicable law and Gexpro Services policy.

5.3. Fair Competition

Suppliers shall comply with applicable competition laws.

5.4. Confidentiality

Suppliers shall protect confidential information received from Gexpro Services.

5.5. Data Protection and Cybersecurity

Suppliers shall protect personal data and confidential information in accordance with applicable data protection laws and shall maintain appropriate cybersecurity measures to prevent unauthorized access, loss, or misuse of information.

5.6. Responsible Use of Artificial Intelligence and Technology

Suppliers that develop, deploy, or use artificial intelligence or other advanced digital technologies in connection with products or services provided to Gexpro Services shall do so in a responsible and ethical manner. Such technologies must not be used in ways that compromise the confidentiality, security, or integrity of Gexpro Services, customer, worker, or supplier information; circumvent applicable laws, contractual obligations, or established controls; or cause unintended harm. Where AI-enabled tools are used, Suppliers are expected to maintain appropriate human oversight and comply with applicable legal and ethical standards.

5.7. Responsible Sourcing of Minerals

Suppliers are expected to conduct due diligence on the source and chain of custody of minerals, including tantalum, tin, tungsten, gold, and cobalt, where applicable, and to reasonably assure that such materials are sourced in accordance with internationally recognized frameworks, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or equivalent standards.



6. Supply Chain Responsibility

Suppliers shall communicate this Code (or equivalent standards) to their own suppliers and subcontractors and take reasonable steps to monitor compliance, using a risk-based approach that prioritizes higher-risk suppliers and geographies.

Where material non-compliance is identified, Suppliers shall implement corrective actions and, where risks cannot be mitigated, consider suspension or disengagement.

Suppliers are encouraged to provide appropriate training and awareness to their employees on labor rights, health and safety, ethical conduct, and the principles outlined in this Code, taking into account the size, risk profile, and nature of their operations.

Reference: OECD Due Diligence Guidance

7. Compliance and Monitoring

Suppliers shall, upon request, provide relevant information to demonstrate compliance with this Code. Gexpro Services reserves the right to assess supplier compliance through questionnaires, documentation review, or audits.

Gexpro Services maintains a risk-based supplier governance and management system, including policies, due diligence processes, monitoring, training, audits, and corrective action mechanisms. This framework is designed to support compliance with applicable laws and alignment with internationally recognized standards, including the Responsible Business Alliance (RBA) Code of Conduct.

Where non-compliance is identified, Suppliers are expected to implement corrective actions within a reasonable timeframe. Failure to address identified non-compliance may result in corrective action, suspension, or termination of the business relationship, depending on severity and persistence of the issue.

8. Reporting Concerns

Any questions or ethics concerns involving Gexpro Services, their employees, customers, suppliers, contractors, or vendors should be promptly raised to senior management of Gexpro Services to ensure that the question or concern is properly reviewed. All questions and concerns will be addressed.

Questions or concerns may be raised via EthicsPoint at **gexproservices.ethicspoint.com**.

Suppliers are also encouraged to provide accessible grievance mechanisms for workers and affected stakeholders, appropriate to their size, risk profile, and operating context. Suppliers shall not retaliate against any individual who raises concerns or reports suspected misconduct in good faith.

9. References

This Code is based on internationally recognized standards, including:

- UN Global Compact
- UN Guiding Principles on Business and Human Rights
- UN Sustainable Development Goals
- UN Universal Declaration of Human Rights
- ILO International Labour Standards
- UK Modern Slavery Act 2015
- Australian Modern Slavery Act 2018
- California Transparency in Supply Chains Act (2010)
- OECD Due Diligence Guidance for Responsible Business Conduct
- Responsible Business Alliance Code of Conduct
- Applicable sustainability reporting and due diligence regulations, including the EU Corporate Sustainability Reporting Directive (CSRD)



One Partner,
Infinite Solutions.