



CODE OF CONDUCT FOR SUPPLIERS, CONTRACTORS, AND VENDORS

Overview

GS Operating, LLC dba Gexpro Services (“Gexpro Services”) believes in conducting business with honesty and integrity, treating all people with dignity and respect, supporting our communities and honoring the laws, regulations and treaties of the countries in which we operate. Gexpro Services strives to select reputable business partners who conduct their business in a manner that demonstrates the same commitment to high ethical standards, safe and healthy working environments, protection of human rights and dignity, protection of the environment and compliance with the law.

This Code of Conduct (“Code”) for Suppliers, Contractors, and Vendors outlines our expectations 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 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 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.

Code of Conduct Elements

- **Child Labor:** Prohibit use or support of child labor in all forms.
- **Forced and Compulsory Labor:** Prohibit use or support of forced or compulsory labor, including withholding salary, benefits, property or documents to force personnel to continue work.
- **Environment, Health, and Safety:** Provide a safe and healthy workplace that prevents potential occupational accidents. Comply with all applicable environmental, health, and safety regulations. Promote the safe and environmentally sound development, manufacturing, transport, use and disposal of your products.
- **Freedom of Association and Right to Collective Bargaining:** Respect the right to form and join trade unions and bargain collectively, in accordance with applicable laws.

- **Discrimination:** Prohibit discrimination based on race, national or social origin, caste, birth, religion, disability, gender, sexual orientation, union membership, political opinions and age.
- **Disciplinary Practices:** Treat all personnel with dignity and respect, including zero tolerance of corporal punishment, mental or physical abuse of personnel. Create a workplace free of harassment or abuse of any kind, including threatening, abusive, exploitative, coercive behavior.
- **Working Hours:** Comply local laws and industry standards regarding minimum wages and working hours.
- **Remuneration:** Comply with local laws and industry standards to respect the right of personnel to earn a living wage.
- **Governance:** Prohibit corruption in all its forms, including extortion, bribery, and money laundering. Abide by all applicable national and international trade laws and regulations including but not limited to antitrust, trade controls, and sanction regimes. Forbid gifts to private or public officials that aim to influence business decisions or otherwise encourage them to act contrary to their obligations. respect the privacy and confidential information of all your employees and business partners as well as protect data and intellectual property from misuse.

Raising Questions or 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 or question is properly reviewed. All questions and concerns will be addressed.

Questions or concerns may be raised via email to: GexproServicesEthics@gexpro.com.