

Business Partner Code of Conduct

Foreword

PennEngineering has a proud 80-year history, and we recognize that our future success will be both achievable and sustainable only if we always act in a manner consistent with our Core Values of Customer-Focus, Innovation, Respect, Collaboration, and Integrity. We expect our managers to actively foster and model the Core Values within our teams, and each one of us, regardless of position, must always comply with all laws, regulations, and company policies. We expect a similarly high standard of integrity from the vendors, suppliers, and business partners with whom we work.

PennEngineering® has made a commitment to be caretakers of our planet: to protect the natural resources of the world, ensure the fair and equitable treatment of all its people, and to support the development and growth of our communities. We ask that our business partners help us achieve these goals by reviewing and agreeing to follow the guidelines set forth in this document. Together, along with our business partners, we must strive to continually do better to reduce our greenhouse gas emissions, reduce pollutants, reduce our energy use, reduce our water consumption, and leave the world better than we found it. We need to be mindful of how we treat our fellow people, both as individuals and in how we come together as communities. We must be respectful of each other, celebrating our differences and similarities both.

Who This Code Applies To

This Code applies to any business partner of Penn Engineering & Manufacturing Corp. and its subsidiaries ("Business Partner," or "you"), including your owners, officers, employees, and any subcontractors or agents acting on your behalf.

1. Ethical and Lawful Business Conduct

Anti-Bribery & Anti-Corruption

PennEngineering takes a strong stance against bribery and corruption. You shall not offer, give, or accept a bribe, kickback, or improper payment or gift — directly or through a third party — to or from any PennEngineering employee, family member, or other business partner in connection with the Program or any related purchasing relationship. This applies even where local custom would otherwise allow such payments.

Conflicts of Interest

You shall disclose any actual or potential conflict between your private interests (including familial or financial relationships with PennEngineering employees) and your partnership with PennEngineering. Favoritism will not be tolerated, and all Business Partners will be evaluated on equal grounds. If you believe a conflict exists, raise it with your PennEngineering representative; most conflicts can be resolved without difficulty.

International Trade & Local Law

You shall comply with all applicable local and international laws, including trade, export/import, and anti-corruption laws. Local and international law take precedence over this Code wherever a conflict arises.

Fair Competition

You shall compete fairly in your markets and shall not engage with PennEngineering in any arrangement that would constitute unlawful price fixing, bid rigging, or market or customer allocation.

2. Protecting Information and Assets

Intellectual Property & Confidentiality

You shall protect any PennEngineering intellectual property, trade secrets, pricing, designs, or other confidential or proprietary information shared with you. This includes safeguarding documents, avoiding discussion of confidential matters in public settings, and using such information solely for purposes related to the relationship with PennEngineering.

Use of the PennEngineering Name and Marks

As a Business Partner, you may be authorized to reference your status and use designated PennEngineering marks in your marketing, subject to PennEngineering's brand and trademark usage guidelines provided to you separately. You shall not represent your relationship with PennEngineering in a manner that is false, misleading, or unauthorized, and shall not imply an affiliation, endorsement, or authority beyond what PennEngineering has expressly granted.

Data Protection

Where PennEngineering shares confidential or sensitive information with you, or where you process personal data on PennEngineering's behalf, you shall maintain reasonable safeguards to protect that information from loss, theft, or unauthorized disclosure, and shall comply with applicable data privacy laws and regulations, including the GDPR where applicable.

3. Human Rights

Human Rights, Fair Labor & Human Trafficking

You shall respect internationally recognized human rights and treat all individuals with dignity and respect. You shall not engage in or tolerate harassment, corporal punishment, threats of violence, or discrimination based on personal characteristics such as gender, age, nationality, ethnicity, skin color, political views, sexual orientation, religious beliefs, social background, or physical ability.

You shall not use forced labor, compulsory labor, child labor (defined as a person younger than 16 or below the applicable legal minimum working age, whichever is greater), prison labor, bonded labor, or indentured labor, and shall take reasonable steps to prevent such practices anywhere in your own supply chain. You shall be vigilant for signs of human trafficking and shall report any such activity or suspicion immediately.

4. Environmental Responsibility

PennEngineering encourages its Business Partners to act as responsible stewards of the environment. We ask that you take reasonable measures to reduce greenhouse gas emissions, energy and water use, and waste in your operations, and that you manage hazardous materials and pollution responsibly. While formal sustainability reporting is not a requirement of the Program, Business Partners are encouraged to share relevant sustainability data with PennEngineering on

request and to consider certification such as ISO 14001 (Environmental Management) and ISO 45001 (Occupational Health & Safety).

5. Product Use and Quality Representations

Where you fabricate, assemble, or incorporate PennEngineering fasteners into your own products, you shall use them in accordance with PennEngineering's specifications and application guidance, and shall not misrepresent the performance, certification, or origin of PennEngineering products to your own customers.

6. Raising Concerns / Speak Up

PennEngineering encourages Business Partners to report any concern about actual or suspected violations of this Code, whether involving your own organization or a PennEngineering employee or representative. Reports may be made, including anonymously, to the PennEngineering Speak Up program:

- **Email:** speakup@pemnet.com
- **Hotline:** (215) 766-1000

PennEngineering will handle reports as discreetly as possible while conducting an appropriate review, and will not tolerate retaliation against anyone who raises a concern in good faith.

7. Compliance, Monitoring, and Consequences

Operating in accordance with this Code is a condition of being a preferred business partner with PennEngineering. PennEngineering reserves the right to request documentation of compliance or to audit a Business Partner's compliance with this Code.

Violation of this Code may result in suspension or removal from the Business Partner Program, loss of preferred-vendor status and any associated marketing rights, and/or termination of the preferred partner relationship, in PennEngineering's discretion.

Thank you for your continued partnership. We look forward to a strong relationship as partners committed to sustainable and respectful business. All of us in our parts will make a difference together.