



# **SUPPLIER CODE OF CONDUCT**

APRIL 15, 2025

ARCWOOD ENVIRONMENTAL, LLC  
6510 TELECOM DRIVE, SUITE 400  
INDIANAPOLIS, INDIANA 46278

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## 1 INTRODUCTION

Arcwood Environmental, LLC, and its subsidiaries and affiliates (“Arcwood”) are committed to conducting business in compliance with ethical standards and all applicable laws, rules, and regulations.

Arcwood conducts business with third party partners, providers, and their authorized and approved subcontractors (“Suppliers”) to deliver products and services to Arcwood and its customers. Arcwood strives to actively pursue and engage with Suppliers which share a commitment to safety, integrity, and compliance. Additionally, Arcwood expects and holds its Suppliers accountable for conducting business honestly and responsibly at all times, whether on Arcwood property, on Arcwood customer property, or throughout normal operations. This Arcwood Supplier Code of Conduct ensures Suppliers are aware of Arcwood’s expectations.

## 2 SUPPLIER CODE OF CONDUCT

Arcwood has the expectation that all Suppliers integrate Environmental, Social and Governance (ESG) principles into their daily operations. The implementation of ESG principles requires conducting business in a manner that exhibits commitment to the ideals of environmental protection, value of employees, and sound governance.

Suppliers play a critical role in the success and growth of Arcwood. Arcwood values these existing and potential supplier relationships and selects and develops Suppliers based on the principles of integrity, respect, and trust. Arcwood Suppliers add value by offering goods and/or services that enhance safety, quality, and cost-effectiveness. Fair and honest business transactions between Arcwood and Suppliers are imperative, while deception and misleading tactics will not be tolerated.

### 2.1 Commitment to Health, Safety, and the Environment

Arcwood aims to enhance and protect the health and safety of human life, while simultaneously protecting and improving the quality of the environment. Achieving these major Arcwood objectives requires conducting operations reliably and efficiently, which includes selecting Suppliers that are similarly committed to these values.

Commitment guidelines for the achievement of this objective include:

- Protect health and safety by providing appropriate training, protocols, controls, procedures, and equipment.
- Implement and abide by health and safety rules and regulations to ensure employee safety and health.
- Respect the environment through compliance with applicable environmental laws.
- Implement waste, emissions, and treatment systems to ensure waste, air emissions, and wastewater discharge is minimized and managed safely and appropriately.

## **2.2 Commitment to Employees**

Arcwood and Suppliers are to cultivate a respectful work environment.

Commitment guidelines for the achievement of this objective include:

- Respect the Freedom of Association and Collective Bargaining Rights and abide by applicable laws related to labor unions.
- Practice no discrimination in hiring, employment, or compensation based on race, sex, religion, color, sexual orientation, disability, age, national origin, gender identity, gender expression, genetic information, veteran status, political preference, or membership or non-membership in any lawful organization.
- Create a workplace free of harassment or any other form of abuse in accordance with applicable laws regarding harassment and abuse, including sexual harassment, bullying, or verbal abuse.
- Prevent involuntary or underage labor and refuse to engage in human trafficking, slavery, child labor, prison labor, indentured labor, or bonded labor; and
- Establish appropriate work hours, wages, and benefits in accordance with applicable laws and regulations.

## **2.3 Commitment to Legal and Ethical Business Conduct**

Arcwood is committed to adherence to ethical standards, conduct guidelines, and all accompanying laws. Arcwood proactively seeks Suppliers who are likewise committed to complying with these same ethical standards, conduct guidelines, and laws. At a minimum, Arcwood expects that its Suppliers will conduct business ethically and abide by all applicable laws, rules, and regulations.

Commitment guidelines for the achievement of this objective include:

### **2.3.1 Professional Standard of Care**

Suppliers must maintain the highest professional standard of care when conducting business.

### **2.3.2 Financial and Business Records**

Suppliers must maintain accurate financial and business records in relation to their business dealings with Arcwood and update these records as required and in accordance with all laws, rules, and regulations.

### **2.3.3 Bribery, Corruption, Extortion, or Embezzlement**

Suppliers' bribery, corruption, extortion, or embezzlement of any kind will not be accepted or tolerated by Arcwood. Arcwood requires that Suppliers not engage or be affiliated with any act that involves bribery, corruption, extortion, or

embezzlement and to comply with the U.S. Foreign Corrupt Practices Act and all other local, national, or applicable laws.

#### **2.3.4 Fair Competition**

Suppliers must always engage in fair competition with Arcwood, abiding by all applicable fair competition and antitrust laws.

#### **2.3.5 Sanctioned Parties**

Suppliers must not source products or services from sanctioned parties when conducting business dealings with Arcwood. Sanctioned parties are individuals or entities that are individually, or by reason of their location, subject to economic sanctions, prohibitions, or other restrictions.

#### **2.3.6 Data Privacy, Information Security, and Intellectual Property**

Suppliers must protect sensitive data and confidential information received or made aware through interactions with Arcwood and Arcwood customers, including, but not limited to intellectual property, customer information, employee information, technology, business processes, and trade secrets. If permitted by Arcwood, transfer of this type of information by Supplier must be undertaken only when necessary precautions are in place and due care is exercised.

#### **2.3.7 Conflict of Interest**

Suppliers must make business decisions free from conflict of interest. All business decisions should be impartial in nature and not to benefit the self-interest of one individual at the detriment/expense of professional or public interest. Suppliers must avoid interactions with Arcwood employees, Arcwood customers, and other Suppliers that create or appear to create conflicts of interest. Upon awareness, all conflicts of interest must be fully disclosed to Arcwood in writing. Refer to “Reporting” section below for further guidance and direction.

#### **2.3.8 Business Gifts and Entertainment**

Arcwood and its employees cannot accept business gifts and entertainment from Suppliers where expenditures are excessive, unlawful, or not business appropriate. Under internal travel and entertainment policies, a business gift and entertainment must follow these strict guidelines:

- Business gifts and entertainment must have a legitimate business purpose.
- Business gifts and entertainment must be reasonable and consistent with legal and ethical guidelines/ limitations.
- Only business gifts and entertainment of nominal value are acceptable.
- Business gifts and entertainment are never to be solicited by an Arcwood employee, Arcwood customer, or other supplier.

### 2.3.9 Modern Slavery

Suppliers must maintain the highest professional standard of care when conducting business. This includes being attentive to the protection of basic human rights of its personnel and third-party personnel used in the provision of supplies or services to Arcwood. For example, Suppliers must be vigilant in ensuring it does not engage in acts that intentionally or unintentionally support modern slavery.

## 2.4 Commitment to Compliance

Arcwood expects Suppliers to demonstrate a commitment to comply with this Supplier Code of Conduct. Additionally, Arcwood expects Suppliers to adhere to all laws, rules, regulations, and site rules through the implementation of robust systems and protocols necessary to ensure that compliance is maintained and enforced. Suppliers should also apply this Supplier Code of Conduct and/or other similar principles in business dealings with respective subcontractors used in connection with Arcwood. Suppliers that fail to comply with the Supplier Code of Conduct are expected to take immediate corrective action or risk loss of current and future Arcwood business.

## 3 REPORTING

Suppliers shall embrace a safe and compliant culture and environment by adhering to the ethical standards set forth herein the Supplier Code of Conduct. Suppliers should always raise concerns regarding any activities, practices, or incidents involving violations or suspicion of violations of these policies and/or applicable laws, rules, or regulations.

On rare occasions, an isolated employee, customer, or supplier may violate or attempt to violate the Supplier Code of Conduct, law, rule, or regulation. If an incident occurs which violates these policies or laws, the incidents must be reported to Arcwood and addressed immediately. Arcwood expects any employee, customer, or Supplier who witnesses or receives information regarding an Arcwood stakeholder engaging in illegal, unethical, or other improper conduct to report these violations to the appropriate Arcwood point of contact. Suppliers are expected to notify Arcwood of legal actions, administrative investigations or prosecutions which may affect their performance of Arcwood business or could potentially adversely affect Suppliers' and/or Arcwood's reputation.

### Reporting Points of Contact

Arcwood provides several points of contact for its Suppliers to report concerns, incidents, and/or violations to the content discussed herein. The appropriate point of contact chosen below is subjective and based solely on the reporting stakeholder situation and preference.

#### Arcwood Stakeholder

This Arcwood point of contact has direct, regular interaction with Suppliers and is responsible for implementing the particular product or service of the supplier. This point of contact is first to receive and investigate any concerns of a potential incident or violation.

*Arcwood Director of Procurement*

This point of contact becomes involved when the integrity of an Arcwood stakeholder is questioned or there are any concerns of a potential major incident or violation. The Arcwood Director of Procurement can be contacted directly via telephone at (317) 243-0811 or email at [ARC\\_purchasing@arcwoodenviro.com](mailto:ARC_purchasing@arcwoodenviro.com). All incident and violation reports will remain confidential, but not all will remain anonymous.

*Arcwood Ethics Helpline*

The Arcwood Ethics Helpline is the point of contact that makes reporting any concerns, incidents, and violations easier in uncomfortable or difficult situations. The Arcwood Ethics Helpline is operated by an independent third party, so reports remain confidential and may be made anonymously where permitted by law. Reporting a violation or suspicion of a violation can be made via web at [arcwoodenviro.ethicspoint.com](http://arcwoodenviro.ethicspoint.com) or by phone at (833) 224-2789 - 24 hours a day, 7 days a week.

This Supplier Code of Conduct is intended to clarify Suppliers' existing obligations for proper conduct. The standards and supporting policies and procedures may change at Arcwood's discretion. Suppliers are responsible for knowing and complying with this Supplier Code of Conduct, current laws, regulations, standards, policies, and procedures that apply to Suppliers' products and services. The most current version of this document can be found at [www.arcwoodenviro.com/supplier/](http://www.arcwoodenviro.com/supplier/).