



Dempsey Corporation

Supplier Code of Conduct

Effective Date: April 3, 2025

Prepared by: VP - ESG

Version: Public Web Version

Purpose

At Dempsey Corporation, we are committed to conducting business ethically, sustainably, and responsibly. We expect the same of our suppliers, distributors, agents, and subcontractors.

This Supplier Code of Conduct outlines our minimum expectations across the areas of labor and human rights, environmental responsibility, ethical conduct, and regulatory compliance. It is based on internationally recognized standards including:

- The UN Global Compact
- The ILO Core Conventions
- The OECD Guidelines for Multinational Enterprises
- Canada's Bill S-211 on forced labor in supply chains

Scope

This policy applies to all suppliers and third parties doing business with Dempsey Corporation, including those involved in the sourcing, manufacturing, packaging, logistics, or delivery of goods and services.

1. Labor and Human Rights

Suppliers must uphold the rights and dignity of workers by ensuring:

- No child labor, forced labor, or modern slavery (in any form)
 - Freely chosen employment and freedom of movement
 - Wages, hours, and benefits that meet or exceed local legal requirements
 - Respect for freedom of association and the right to collective bargaining
 - A workplace free from discrimination, harassment, and retaliation
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2. Health and Safety

Suppliers must provide a safe and healthy workplace, including:

- Hazard identification and mitigation measures
 - Access to clean water, sanitation, and emergency procedures
 - Adequate safety training and protective equipment
 - Compliance with applicable local and national health & safety laws
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3. Environmental Responsibility

Suppliers must operate in an environmentally responsible manner by:

- Complying with all relevant environmental laws and regulations
- Preventing pollution and managing emissions, waste, and hazardous materials responsibly
- Reducing resource consumption and supporting sustainable material sourcing
- Participating in Scope 3 environmental data sharing when requested

See Dempsey's Environmental Policy for further details.

4. Ethical Business Conduct

Dempsey expects all suppliers to uphold the highest standards of integrity, including:

- No bribery, corruption, extortion, or embezzlement
- Transparent and accurate recordkeeping and reporting
- Protection of intellectual property and confidential information
- Avoiding conflicts of interest and improper influence

All suppliers must comply with Dempsey's Anti-Bribery and Anti-Corruption Policy.

5. Conflict Minerals

Suppliers must disclose the presence of tin, tantalum, tungsten, and gold (3TG) in supplied products and confirm whether these minerals are sourced responsibly. Dempsey aligns with the OECD Due Diligence Guidance for Responsible Mineral Supply Chains.

See our Conflict Minerals Policy for supplier requirements.



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6. Data Privacy and Confidentiality

Suppliers must protect the privacy of any personal information shared by Dempsey in accordance with applicable laws, including PIPEDA. Confidential data must not be used or disclosed without proper authorization.

7. Compliance and Monitoring

- This Code must be reviewed and acknowledged as part of supplier onboarding.
- Dempsey may request supporting documentation or conduct audits to assess compliance.
- Non-compliance may result in corrective action, suspension, or termination of the supplier relationship.

Suppliers may submit their own Code of Conduct for equivalency review, subject to Dempsey's ESG Committee approval.

8. Grievance and Reporting

Suppliers and workers may confidentially report violations of this Code via Dempsey's whistleblower email:

redflag@dempseycorporation.com

All reports are reviewed independently and protected from retaliation.

Continuous Improvement

Dempsey collaborates with its supplier network to improve ESG practices through training, engagement, and annual reviews. Metrics and progress related to responsible sourcing are reported in our Annual ESG Report.