



barrywehmiller
BUILDING A BETTER WORLD THROUGH BUSINESS

CODE OF CONDUCT & ETHICS

From the Chairman and CEO

To our team members:

Throughout our global organization, we challenge ourselves daily to strive to a unique measure of success: by the way we touch the lives of others. That commitment, articulated in the opening line of our Guiding Principles of Leadership (GPL), unites us around the globe, no matter where you work or what you do for the organization. Through it, we're saying that Barry-Wehmler cannot be defined solely by *what* we do—the products we make and the services we provide—but, moreover, by *the way* we do it—how we act during the course of our business activities, and that includes the integrity of our actions.



The Barry-Wehmler Code of Conduct and Ethics, and supporting policies, provides us with guidance for how to operate our business responsibly and act ethically. With our GPL (and other vision documents) as our compass, this Code serves as our roadmap. Each of us is responsible for reading it and acting in accordance with it. Please do not hesitate to speak up if you have a concern or see something wrong, and to seek guidance any time you are unsure about the right thing to do.

I am proud to lead a company that has a long history of highly ethical business practices, including empowering our team members to do the right thing. With this Code, together we will continue to drive our business forward, while remaining committed to making a positive difference in the lives of everyone who crosses our paths. Thank you for your continued service and dedication to these ideals!

Sincerely,

A handwritten signature in black ink that reads "Bob Chapman". The signature is fluid and cursive, with a long horizontal line extending from the end of the name.

Bob Chapman
Chairman and CEO, Barry-Wehmler

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Introduction to the Code

The Barry-Wehmiller Code of Conduct and Ethics (the “Code”) sets out the principles and standards we hold the Company and our team members to while working on behalf of Barry-Wehmiller Companies Inc., BW Forsyth Partners LLC (“BWFP”)¹, and each of our subsidiaries, affiliates and related companies (collectively, “we,” “Barry-Wehmiller” or the “Company”) unless otherwise specified. Within the Code, we have brought together the various ideals, principles and expectations that represent the core values of Barry-Wehmiller, and to explain, in one place, how Barry-Wehmiller conducts our business ethically and fairly. This Code underscores the importance we place on clearly stating our beliefs and principles, and our commitment to conducting our business with the highest ethical standards and integrity, consistent with and in accordance with the Guiding Principles of Leadership and other vision documents, such as those adopted by BWFP companies (collectively, our “Principles”). We expect Barry-Wehmiller team members to take the time to review this Code and engage in discussions within the Company with the purpose of assuring that our actions align with this Code. We believe the attributes within this document are valuable for all organizations and that they represent best practices to raise the bar of ethical behavior.

Purpose of the Code

The purpose of this Code is to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Proper utilization and protection of Company assets;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that Barry-Wehmiller provides to our stakeholders;
- Compliance with applicable governmental laws, rules and regulations;
- Respectful, fair and safe workplaces for our team members;
- Prompt and appropriate internal reporting of violations of this Code; and
- Accountability for adherence to this Code.

How to Raise Concerns

Barry-Wehmiller encourages team members to share any business conduct concerns they have, in good faith and without fear of retaliation. If, at any time, you feel the Company or any of our leaders or team members are not living up to the ideals and principles set forth in this Code, reach out to your leader or your local Culture and People Development (“CPD”) representative or, if you would prefer, utilize the EthicsPoint Confidential Call Line, available at www.barrywehmiller.ethicspoint.com.

¹This Code does not apply to Cor Partners Inc. and its subsidiaries.



Foundation for Our Culture

This Code is based on the principles of leadership and stewardship embodied in our Principles, adopted by the Board of Directors and put into practice by Company leadership. The expectations set out in the Code stem from the foundational philosophies and ideals articulated in our Principles, Living Legacy of Leadership (“L3”) and related documents.

Our commitment to a people-centric culture runs deep and has inspired a leadership model that places a priority on improving the lives of the people who make our business possible. This Code expands upon the concept of an environment of trust, one of the Company’s core cultural values. The Code is intended to promote a culture in which fairness, respect and personal accountability are valued and encouraged.

Guiding Principles of Leadership (and Other Vision Documents)

We strive each day to bring meaning and purpose to the work of our team members by fostering a culture based upon these core tenets: trust, respect, teamwork, recognition, continuous improvement and personal growth. We also challenge ourselves to make a positive impact on all of the lives we touch throughout the course of doing business—from our team members’ families, to our customers and suppliers, to our shareholders, to the communities in which we work and live.

Living Legacy of Leadership

Our L3 journey focuses on the convergence of the Lean tools of improvement with our deep commitment to caring for people as articulated in our Principles. By coupling people-centric leadership practices with process-improvement tools, we enable our people to fully share their gifts and create a positive impact on the business, while experiencing fulfillment in their lives. The success of our L3 approach requires not only a concerted commitment from the Company to our team members, but it also requires each team member to uphold a culture of integrity and foster an environment of responsible freedom.

Guiding Principles of Leadership

We measure success by the way we touch the lives of people.

A clear and compelling **vision**, embodied within a sustainable business model, which fosters personal growth

Leadership creates a dynamic environment that:

- Is based on **trust**
- Brings out and **celebrates** the best in each individual
- Allows for teams and individuals to have a **meaningful** role
- Inspires a sense of **pride**
- **Challenges** individuals and teams
- **Liberates** everyone to realize “true success”

Positive, insightful communication empowers individuals and teams along the journey.

Measurables allow individuals and teams to relate their contribution to the realization of the vision.

Treat people **superbly** and compensate them fairly.

Leaders are called to be visionaries, coaches, mentors, teachers, and students.

As your sphere of influence grows, so grows your responsibility for **stewardship** of the Guiding Principles.

We are committed to our employees’ personal growth.

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L³ Living Legacy of Leadership

The convergence of the Guiding Principles of Leadership and Lean Enterprise

We commit to a sustained leadership model that creates a culture where each of us returns home with a sense of fulfillment.

- Share the vision of a vibrant future, driven by empowered individuals working in teams, committed each day to continuous improvement.
- Chart our progress in a way that reflects our passion for people.
 - Daily communication, sharing, and listening;
 - Connects team members to the vision;
 - Recognizes, encourages, and inspires people.
- A partnership of trust fosters an environment of responsible freedom.
 - In an environment of responsible freedom, we are inspired to contribute our gifts and talents, have a bias for action, and are accountable for the outcome.
- By coming together in cross-functional interaction, we leverage our collective knowledge and build empathy for others, resulting in improved processes.
 - When we have empathy, we understand, respect, and value others’ perspective.
- As leaders, we encourage others to discover, develop, and apply their talents, enabling them to reach their full potential.
 - Each of us has the capacity to lead and inspire others through our actions.
- Through recognition and celebration of individual and team achievements, we strengthen the heart and soul of the organization.

As we move forward on this journey, we will be inspired to engage our head, heart, and hands to create habits that result in extraordinary levels of achievement and fulfillment.

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Act With the Highest Standard of Honesty, Ethics and Integrity

Barry-Wehmiller expects team members to conduct Company business with the highest standards of honesty, ethics and integrity. Even when conduct is legal, or not legally restricted, we must always be confident that the actions we take are honest and ethical. This applies to our dealings with each other, with customers, with suppliers and with all other third parties. Team members are expected to alert their leaders whenever an act that compromises these standards is reasonably suspected; team members can be assured that the Company prohibits retaliation against anyone who raises or reports a business conduct concern in good faith or cooperates in a Company investigation.

Conflicts of Interest

We strive to achieve our competitive advantage through our fair and honest business dealings, and each team member, officer and director is expected to accord fair and honest treatment to Barry-Wehmiller's customers, suppliers, competitors and team members. Fairness involves respect for the property of others, their self-esteem and their contributions to the overall success of the Company. This means we will not intentionally or purposefully take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair practice—including overly aggressive selling through misstatements, innuendo or rumors about our competitors, their products or their financial condition. Additionally, we will not make unsupportable promises concerning the Company's products.

To conduct fair business dealings also means we, as Barry-Wehmiller team members and leaders, must avoid engaging in any activity that might create a conflict of interest or create a perception of a conflict of interest. A conflict of interest occurs when, for any reason, we are in a position that our conduct could be, or appear to be, influenced by some factor other than concern solely for the best interests of Barry-Wehmiller. Conducting fair business dealings also means we are responsible for and owe a duty to Barry-Wehmiller to advance the Company's legitimate interests when the

opportunity to do so arises. In addition to avoiding conflicts of interest, we must not take for ourselves or divert to others any business opportunity or idea discovered in the course of employment in which Barry-Wehmiller might have an interest.

Financial Integrity

Barry-Wehmiller's stakeholders—including our shareholders, creditors and others—have legitimate interests in the Company's financial and accounting information. The integrity of the Company's financial reporting and accounting records is based on the validity, accuracy and completeness of the information supporting the entries to our financial books and records. All financial books, records and accounts must accurately reflect transactions and events, and conform to generally accepted accounting principles and to Barry-Wehmiller's internal control system.

Team members are expected to comply fully with Barry-Wehmiller's internal control system, financial integrity program (including but not limited to peer review) and inquiries from our external auditors. Information must not be falsified or concealed under any circumstances.

Examples of unethical financial or accounting practices include:

- Making false records or entries that intentionally hide or disguise the true nature of any transaction;
- Improperly accelerating or deferring the recording of expenses or revenues to achieve financial results or goals;
- Maintaining any undisclosed or unrecorded funds, or "off-the-book" assets, liabilities or reserves (except as required by U.S. law and regulations, including the U.S. Generally Accepted Accounting Principles);
- Establishing or maintaining improper, misleading, incomplete or fraudulent account documentation or financial reporting;
- Making any payment for purposes other than those described in documents supporting the payment; and
- Signing any documents believed to be inaccurate or untruthful.

Safeguarding Company Assets

Every team member must safeguard Barry-Wehmiller property from loss or theft, and may not take such property for personal use. In addition to the Company's facilities and equipment, Barry-Wehmiller property incorporates office equipment, supplies, computers and software, as well as business and financial information—including intellectual property, confidential information, and information pertaining to sales, earnings, balance sheet items, business forecasts, business plans, acquisition strategies and other information. Team members must appropriately secure all Barry-Wehmiller property within their control to prevent its unauthorized use.

Business and financial information may be used only in the performance of our duties, and may be disclosed or communicated to persons outside of Barry-Wehmiller only to the extent that they need the information in connection with their business relations with Barry-Wehmiller, or as may be required by law. Barry-Wehmiller business records must be maintained for the periods specified in, and in accordance with, the

applicable records retention policies. Records may be destroyed only at the expiration of the pertinent period. In no case may documents required for, or information requested in, a pending or threatened litigation, government inquiry or under subpoena be discarded or destroyed, regardless of the period specified in the applicable policy. In addition, team members are prohibited from destroying, altering or concealing any record, or otherwise impeding any official proceedings, either personally or in conjunction with others, or by attempting to influence another person.

Protecting and properly using Company assets obliges our fair, honest and ethical application of Company resources for business development, and travel and entertainment, in accordance with Barry-Wehmiller's **Business Travel and Expense Policy—Global**, if applicable. This precludes business inducements of anything more than a minimal value given to any person, firm or organization—whether associated with a customer, supplier, competitor, government or otherwise—to obtain improper preferential treatment for either Barry-Wehmiller or the team member, officer or director.



Appropriate Use of Information Technology

Barry-Wehmiller's **Acceptable Use Policy-Global** describes the acceptable uses of Company computing and information technology assets ("BW IT Assets") in a manner that balances the need for team members to access BW IT Assets to deliver our services to customers, suppliers and team members, with the need to secure sensitive information in accordance with applicable laws. When possible, the Company allows team members to access BW IT Assets with the understanding that team members will exercise good judgment, comply with the requirements of the aforementioned policy, and not attempt to create, access, send or store information in a manner inconsistent with that policy or applicable laws.

In general, when using BW IT Assets, team members are not permitted to access information they are not authorized to view, alter files or systems without authorization, use BW IT Assets to hack into internal or external systems, or use BW IT Assets to violate any laws or Company policies.

Confidentiality of Information

Doing business ethically and with integrity means we must respect the confidential information of Barry-Wehmiller and our team members, as well as the information of our customers and vendors.

Confidential information and trade secrets represent important proprietary assets of the Company that each team member has a continuing obligation to protect. To ensure confidential Company information remains protected, certain team members may be required to complete an agreement addressing non-competition, confidentiality and trade secrets.

Confidential information cannot be discussed with anyone outside of the Company and is only to be discussed within Barry-Wehmiller on a need-to-know basis. Information is considered confidential if the word "confidential" or other similar word appears on its face, if the cover letter or e-mail message to which a document was attached indicates that it is confidential, or if the person communicating the information might reasonably assume a team member would understand it to be confidential. Additionally, any information communicated to team members by a third party with whom Barry-Wehmiller has a

non-disclosure agreement, confidentiality agreement or other contract that contains a confidentiality clause is considered confidential. If team members are not sure if any given information is confidential, they should contact their leaders. It is a best practice to assume all Company and customer information is confidential unless team members have been specifically told otherwise by their leaders or the customer.

Team members also have a responsibility to avoid unnecessary disclosure of non-confidential internal information about the Company, and our team members, customers and suppliers. This responsibility is not intended to impede normal business communications and relationships, but is intended to alert team members to their obligation to use discretion to safeguard internal Company affairs.

Finally, correspondence marked as "confidential," or with a similar marking, should be opened by addressee only.

Compliance With Laws

Barry-Wehmiller complies with all laws, rules and regulations that apply to our companies and operations, regardless of where in the world they are located. As team members, officers and directors of a global company, each of us must comply with the letter and spirit of every applicable law and regulation in the country and locality in which we operate. Each of us is responsible for understanding the laws and regulations that relate to our roles and responsibilities, including those pertaining to environmental, health and safety, employment, and securities and antitrust matters. When conflicts arise between Barry-Wehmiller's business ethics and the practices, customs and laws of a country, Barry-Wehmiller seeks to resolve these conflicts in a manner consistent with our ethical beliefs. We will not proceed with any proposed action that compromises our ethical beliefs or damages the ethical reputation of the Company.

Bribery and Corrupt Practices

A bribe is anything of value—including money, gifts, favors, entertainment, travel, and business and employment opportunities—offered, promised or given directly or indirectly to improperly influence the actions of a third party to obtain or retain business or a business advantage.

Offering or paying bribes, or other improper payments, to win business is unacceptable no matter where we do business. Almost all countries in which the Company does business have laws that prohibit bribery, corruption and kickbacks. Bribes and other corrupt payments may violate multiple anti-corruption laws—including, but not limited to, the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act—and expose team members and the Company to civil and criminal liability and severe penalties.

Barry-Wehmiller does not tolerate bribery of any form, whether done directly or indirectly through third parties, regardless of whether a team member may think it is appropriate under local laws or traditions. Barry-Wehmiller may be held liable for violations of anti-bribery laws by our outside agents or sales representatives.

If team members are unsure if a payment may be in violation of this Code or relevant anti-bribery laws, they should seek advice from the Barry-Wehmiller Legal Department before offering, making, giving or receiving such payment.

International Trade Laws

As a global company, it is critical that Barry-Wehmiller complies with all applicable international trade laws. This involves exercising appropriate due diligence regarding the third parties with which we do business, and that we comply with all international laws regulating trade, as well as local import and export laws and regulations.

Barry-Wehmiller must comply with U.S. federal regulations and orders, and other trade laws in all jurisdictions in which we operate, regarding selling to, trading with, or otherwise doing business with countries or nationals listed on the U.S. Office of Foreign Assets Control (“OFAC”) list of Specially Designated Nationals and Blocked Persons (“SDN List”). In particular, no Barry-Wehmiller subsidiary may sell to, trade with, or otherwise conduct business with (including engaging in discussions or conversations with) any person or company located in or owned by individuals in countries subject to sanctions by the U.S. Department of State or Department of the Treasury.

If team members have a question as to whether a transaction is subject to sanctions, they should contact the Barry-Wehmiller Legal Department. Any exceptions to this section of the Code must be approved in writing and may be subject to additional restrictions. Any Barry-Wehmiller companies granted this exception are still subject to all of the provisions of this section of the Code, other than the specific exception(s) granted.

Further, Barry-Wehmiller complies with, and expects all team members to comply with, U.S. and other governmental trade controls that apply to Barry-Wehmiller commercial activities. This applies to all Barry-Wehmiller companies that import or export equipment, goods, parts, components, supplies and other items that are subject to trade controls, directly or indirectly, into or out of any country in which we do business or conduct other commercial activity.

Barry-Wehmiller expects full cooperation with customs entities globally via strict compliance with applicable rules and regulations.

Compliance with trade control laws requires a commitment from all team members who are involved in such transactions, and compliance starts at the facility level. This includes, but is not limited to:

- Proper use on international documentation and systemic maintenance of the correct and specific Harmonized Tariff Code (HTC) classifications for all imports and exports to the full 10 digits applicable in the local country;
- Proper use on international documents and systemic maintenance of the correct country of origin for every item imported or exported;
- Strict compliance with the rules of any free trade agreement that may exist between the countries involved in an import/export transaction; and
- Due diligence in assessing whether any items for import or export in a particular transaction require licenses or permits in either the origin or destination country. Any required licenses or permits must be obtained prior to the movement of these goods.

Data Privacy

Barry-Wehmiller takes the privacy of our team members, customers and suppliers seriously. We are committed to treating personal information correctly through compliance with relevant laws, and sound operational and technology standards.

To this end, Barry-Wehmiller's **Global Privacy Policy**, along with several additional procedures and protocols, establishes our commitment to data protection and the safeguarding of personal information by:

- Processing personal information fairly and lawfully;
- Transparently communicating to people the specific ways in which their personal information will be processed;
- Ensuring that the personal information we handle will be adequate, relevant and not excessive for the purpose it was collected;
- Taking reasonable steps to ensure the personal information we process is accurate and up-to-date;
- Keeping personal information for only as long as necessary and only for the purpose it was collected;
- Processing personal information in accordance with each individual's rights under applicable data protection laws; and
- Responding to requests for access to personal information from individuals in a timely manner.



Corporate Responsibility

Ethical and Fair Dealings With Suppliers

Barry-Wehmiller is committed to sourcing quality parts and materials, and developing partnerships with suppliers that share common principles of fair and honest trading. We are committed to ensuring that the merchandise we source is obtained only from suppliers that strive to maintain satisfactory working conditions, and comply fully with all legal requirements and the labor, health and safety standards of those countries in which their processes take place.

We seek to uphold the following standards in dealings with suppliers, and require that suppliers have policies and practices in place consistent with the following standards:

- Compliance with applicable laws and good practices in all employment relationships;
- Use of terms and conditions in employment relationships that are compatible with fair, honest trading practices and have due regard to the wellbeing of individuals;
- Utilization of fair and reasonable rewards for team members;
- Employment practices that prohibit the exploitation of children;
- Employment practices that prohibit the exploitation of team members in general, including the use of forced labor or labor practices that involve the harsh or inhumane treatment of team members;
- Recognition of the rights of team members to be members of trade unions of their own choosing, and to bargain collectively, as is in conformity with local law; and
- Manufacturing processes that are carried out under conditions with proper and adequate regard for the health and safety of those involved.

Conflict Minerals

Although the Company is not subject to the jurisdiction of the U.S. Securities and Exchange Commission ("SEC"), Barry-Wehmiller operates in a manner consistent with the SEC's U.S. Conflict Minerals Rule, and other similar laws and regulations around the world, as part of our commitment to responsible sourcing. Under those rules, conflict

minerals are tin, tantalum, tungsten and gold (also known together as “3TG”)—which are derivatives of cassiterite, columbite-tantalite and wolframite—regardless of where they are sourced, processed or sold. The intent of the U.S. Conflict Minerals Rule and similar regulations is to address violence and human rights violations in the mining of these minerals from portions of an area described as the “Covered Countries,” meaning the Democratic Republic of the Congo and its surrounding countries.

Barry-Wehmiller supports the objectives of the U.S. Conflict Minerals Rule and similar regulations. Furthermore, we do not knowingly procure any 3TG that originate from the Covered Countries, unless processed by smelters and refiners that are verified or are in the process of becoming verified as “conflict free.”

Consistent with this commitment, we ask our vendors and suppliers to undertake reasonable due diligence with their supply chains to determine the location from which 3TG are being sourced, and whether the smelter or refiner has been verified by an independent third party as “conflict free.”

Maintaining a Respectful, Fair and Safe Workplace

At Barry-Wehmiller, we are committed to a work environment in which all individuals are treated with respect and dignity. Harassing and bullying behavior are strictly prohibited. Harassment includes, but is not limited to, unwelcome conduct—whether verbal, physical or visual—that is based upon race, religion (including religious dress and religious grooming), ethnicity, color, ancestry, creed, age, genetic information, disability (mental and physical, including HIV and AIDS), medical condition (cancer/genetic characteristics and information), national origin (including language use restrictions), sex (gender, gender identity, gender expression), sexual orientation, marital status, familial status, parental status, domestic partner status, citizenship status, pregnancy (including perceived pregnancy, childbirth, breastfeeding or related medical conditions), military caregiver status, military status, veteran status or any other status protected by applicable law.

U.S. team members may review the Barry-Wehmiller **Respectful Workplace Policy (Harassment Prevention)-U.S.** for further information on this topic.



Workplace Health and Safety

Barry-Wehmiller's Global Safety Vision, along with our Principles, sets out the Company's commitment to safety across all aspects of our operations. We recognize our responsibility to provide and maintain a working environment that ensures the wellbeing of our people, customers, suppliers, contractors and visitors. We want to prevent accidents and illness by making sure that health and safety considerations are at the heart of everything we do. To make this happen, we encourage everyone who works at or visits Company facilities to actively take part in and support this objective.

Specifically, we commit to:

- Providing and maintaining safe premises and healthy working environments;
- Ensuring we effectively assess risks and apply measures to control them;
- Providing and maintaining safe facilities, equipment and associated operating procedures;
- Identifying substances that are potentially hazardous to team members' health, and making sure arrangements are made to mitigate the risks these substances pose;
- Providing information, instruction, training and supervision to make sure everyone can carry out their work safely;
- Ensuring we involve and consult with team member representatives on health and safety issues; and
- Investigating accidents, incidents and cases of work-related illness, so we can identify and address any gaps in our health and safety management processes.

Barry-Wehmiller does not tolerate violent acts or behaviors, which may include, but are not limited to:

- Threats of any kind;
- Threatening, physically aggressive or violent behavior, such as intimidation of, physically harming or attempts to instill fear in others;
- Other behavior that suggests a propensity toward violence, including threatening speech, shouting, sabotage, threats of sabotage of Company property, or a demonstrated pattern of refusal to follow Company policies and procedures;



- Defacing Company property or causing physical damage to the facilities;
- Bringing weapons or firearms of any kind onto Company premises, including Company parking lots. A license to carry a weapon does not override Company policy, unless applicable local law requires otherwise. Weapons include, but are not limited to, firearms, explosives, knives, and other items that can be considered dangerous or that could cause harm;
- Possessing, using, or displaying weapons or firearms of any kind while conducting Company business, regardless of whether the team member has a concealed carry permit or license to carry a weapon;
- Acts that are persistently menacing in nature, such as stalking; and
- Any other act of a violent nature.

Ethical Employment Practices and Non-Discrimination

At Barry-Wehmiller, our commitment to equal opportunity is inherent in our Principles and our people-centric culture. Barry-Wehmiller team members and leaders are expected to treat every individual fairly and respectfully, including those seeking employment or professional growth, without regard to their actual or perceived race, creed, color, religion, alienage or national origin, ancestry, citizenship status, age, medical condition, disability or handicap, sex, marital status, veteran status, service in the military, sexual orientation, gender identity or expression, genetic information, pregnancy or pregnancy-related condition, familial or parental status, AIDS status or any other characteristic protected by applicable laws. Barry-Wehmiller is committed to these principles with respect to recruitment, hiring, placement, promotion, transfer, training, termination, layoff, recall, leave of absence, compensation, benefits, team member activities and general treatment of team members during employment.

Furthermore, we must abide by all wage and hour laws in the locations where we do business. We do not tolerate the employment of children or forced labor.

U.S. team members may review the Barry-Wehmiller **EEO Policy-U.S.** (equal employment opportunity) for further information on this topic.

Political and Charitable Contributions

Barry-Wehmiller supports the communities in which we are located and the people within those communities. Each business unit and/or facility may identify and support a variety of charities and causes as local leadership determines to be appropriate. Barry-Wehmiller also encourages our team members to be responsible citizens and support charities of their choice. No team member's employment or position at the Company will be affected because of support of (or opposition to) charities or candidates for political office. Neither Barry-Wehmiller, nor our leaders, will pressure a team member into making individual contributions to charitable fund drives or political campaigns.

Barry-Wehmiller will not reimburse any team member for individual contributions to any political party or candidate for public office, and team members will not use any Company resources—including time

during working hours—for such contributions. Team members who wish to participate in political activities must do so during non-working hours and away from Company property.

Barry-Wehmiller may choose to make political contributions or donations to charities, as long as doing so is in accordance with local laws. Additionally, all such expenditures shall be approved by the Chief Executive Officer or the Guiding Coalition.

Additional Policies, Procedures, Protocols and Other Guidelines

In addition to the policies, procedures, protocols and other guidelines included in the Code, Barry-Wehmiller expects team members to be knowledgeable of and to follow all other applicable Company policies, procedures, protocols and guidelines—whether as defined locally or more broadly. With regard to specific policies referenced in the Code, the full and complete policies take precedence over Code policy summaries in all cases. To review complete policies, including those specifically referenced in the Code, reach out to your leader or local CPD representative, or visit the Barry-Wehmiller intranet. To that end, this Code is to be read and understood in harmony with all other Company, platform, division and local policies. If you believe any element of the Code is at odds with another policy, please contact your local CPD representative to discuss how to address the conflict.

Duty to Report Concerns

Each team member is responsible for reporting to the Company any circumstances that the team member believes may constitute a violation of this Code, as well as any other Company policies. Team members must act in good faith in reporting possible misconduct or other policy violations. Suspected policy violations may be reported, without fear of retaliation, to your leader or local CPD representative. Reports may also be made via the EthicsPoint Confidential Call Line, available at www.barrywehmiller.ethicspoint.com. The Company will investigate any matter reported and will take any corrective action deemed appropriate.

Non-Retaliation

In accordance with our **Retaliation Prevention Policy**, Barry-Wehmiller treats complaints of inappropriate or illegal activity seriously, and expects our team members to act responsibly in raising these issues, while recognizing the sensitivity of such matters for all concerned and considering the possible consequences. Therefore, filing a legitimate complaint will not itself be grounds for discipline.

Retaliation occurs when a company (through a leader or team member) takes adverse action, or punishes, a team member for:

- Participating in a legally protected activity, such as requesting an accommodation for health or religious reasons; or
- Raising a concern about a suspected violation of a law, a policy, or a workplace condition that could have an impact on the safety, health or wellbeing of others.

Retaliation in the workplace may be expressed in a variety of ways including, but not limited to, discharge, demotion, pay reduction, denial of benefits, intimidation, threats, reassignment to a less desirable role or unwarranted discipline.

Leaders and team members who are found to have retaliated against a team member who was exercising their right to participate in a protected activity, or reporting a violation of a law, a policy or a workplace condition, as described above, may be subject to appropriate disciplinary actions, up to and including termination.

Potential Consequences of Code Violations

The Code is an essential element of our culture of integrity and our commitment to providing a fair and safe workplace for our team members. Code violations may result in serious disciplinary actions, up to and including termination, where permitted by local law.

Conclusion

Our collective commitment to the principles embodied in this Code helps create and maintain a culture of integrity, supports decision-making that is aligned with our people-centric culture, and promotes a work environment in which fairness, respect and personal accountability are valued and encouraged.

