



Company Code of Conduct

A Message from President, Ross Richards

Since 1966, Pollington Machine Tool has been recognized as a business built on the principles of trust, integrity and strict compliance with the law, as well as fairness in our relationships with our employees, suppliers and customers.

Our vision is clear: to be the trusted leader in precision manufacturing. We aim to deliver innovative, high-quality aluminum and steel components that drive the future of the aerospace, military, automotive, medical, and energy industries. This vision is rooted in our legacy of excellence, integrity, and partnership, which we continue to uphold and build upon every day.

At Pollington Machine Tool, we are dedicated to providing exceptional precision machining, fabrication, welding, and testing services that meet the unique needs of our clients. Leveraging state-of-the-art technology, a highly skilled workforce, and more than five decades of expertise, we are dedicated to delivering reliable, on-time solutions that not only meet but exceed industry standards. As a family-owned company, we are deeply committed to fostering long-term relationships, driving innovation, and maintaining the highest levels of quality and safety. Every component we produce is a reflection of our promise to contribute to our customers' success and the advancement of their industries.

Our Code of Conduct embodies these core values and applies to every member of Pollington Machine Tool, Inc. It serves as a roadmap, guiding our daily actions and decisions, and ensuring we remain true to who we are and what we stand for.

Let's continue to work together with purpose and passion, upholding the principles that have made us who we are while pushing the boundaries of what we can achieve.

Sincerely,

A handwritten signature in black ink that reads "Ross Richards".

Ross Richards,
President



1. Our Commitment to Integrity and Ethical Conduct

Pollington Machine Tool, Inc. is committed to conducting business in an ethical, socially responsible, and sustainable manner. We hold ourselves to high standards in business ethics, labor rights, health and safety, and environmental impact. We believe in fostering an environment where human rights, labor standards, environmental sustainability, and business integrity are upheld.

1.1 Purpose of the Code

This Code sets ethical standards for employees, leadership, and business partners, ensuring integrity, accountability, and legal compliance. It provides a decision-making framework to prevent misconduct, conflicts of interest, and unethical behavior while fostering a culture of honesty, fairness, and respect. By defining clear expectations, it promotes a safe, inclusive, and responsible workplace, strengthening trust among stakeholders. Employees are expected to comply with all applicable laws and regulations in the jurisdictions where we operate, and to refer to the Code for guidance in ethical and compliance matters or to seek additional information when needed.

2. Human Rights and Labor Practices

Pollington Machine Tool believes that every individual has the right to be treated with fairness and dignity. We recognize human rights and treat all individuals with respect, as set out in international human rights standards. Employees and leaders will exercise due diligence in identifying, preventing, and addressing human rights risks. Please see our Labor and Human Rights Policy for more information.

2.1 Respectful and Harassment-Free Workplace

Pollington Machine Tool is committed to maintaining a workplace free from harassment and abuse by:

- Prohibiting all forms of verbal, physical, and sexual harassment or abuse.
- Ensuring disciplinary measures are fair, humane, and clearly communicated to all employees.

2.2 Health & Safety

PMT does not compromise on the health and safety of our employees. Our goal is zero harm while actively promoting a safety culture. See our Safety and Health Policy Statement for further information. We make a concerted effort to:

- Ensure that workspaces are safe and comply with health and safety regulations, including emergency preparedness procedures.
- Provide personal protective equipment and safety training for employees.
- Maintain clean facilities, provide access to clean water and sanitation, and ensure workers have access to breaks, including lactation and restroom breaks.

2.3 Fair Employment Practices and Labor Rights

This organization upholds equal employment opportunities, ensuring a workplace free from discrimination based on race, gender, sexual orientation, religion, or any other characteristic by:



- Prohibiting discrimination in hiring, compensation, promotion, and termination.
- Implementing policies that promote equal opportunities for all employees.

2.4 Prohibition of Forced and Child Labor

Pollington Machine Tool strictly prohibits modern slavery and forced labor in any form, including bonded labor, involuntary prison labor, and human trafficking. All labor must be voluntary, and workers must have freedom of movement. Please review our Forced and Child Labor Policy for more details.

- Workers must retain control of their identity documents and be free to terminate employment without penalty.
- No security deposits or movement restrictions are allowed.
- Procedures are in place to assess and mitigate the risks of modern slavery and human trafficking.

We also firmly oppose any form of child labor. Along with our business partners, we ensure that no child labor is used in our operations and that all young workers meet or exceed legal age requirements.

- Child labor is strictly prohibited, with processes in place to prevent its occurrence.
- The minimum employment age must comply with local legal standards or be at least 15, except for legally compliant apprenticeship programs.

2.5 Freedom of Association and Collective Bargaining

This organization respects the right to freedom of association and collective bargaining, ensuring that individuals are free to participate in or refrain from any association without discrimination or interference. Employees have the right to representation by trade unions or other representatives, in accordance with local laws.

3. Business Ethics and Integrity

We are committed to conducting business with integrity, ensuring that all individuals acting on behalf of our company uphold the highest ethical standards in their decision-making and conduct. PMT emphasizes creating a culture of compliance in which employees understand their roles and responsibilities.

3.1 Anti-Bribery and Corruption

At Pollington Machine Tool, we adhere to all applicable anti-bribery and anti-corruption laws, including the U.S. Foreign Corrupt Practices Act. We do not:

- Offer, promise, give, or accept anything of value to gain improper business advantages.
- Engage in corrupt practices, including bribery, extortion, or embezzlement.

3.2 Fair Competition and Antitrust

Compliance with all relevant fair trade, competition, and antitrust laws shall be maintained. This includes refraining from:

- Anti-competitive agreements such as price-fixing or market allocation.
- Insider trading based on sensitive company or partner information.



3.3 Conflicts of Interest

Under no circumstances should personal interests compromise or appear to compromise the best interests of Pollington Machine Tool.

- PMT expects all employees to act in the company's best interests, dedicating their full time, attention, and capabilities to their duties during working hours. Employees must avoid any actions or situations that create, or could create, a conflict between their personal interests and their responsibilities to PMT. Even the appearance of a conflict should be avoided.
- This expectation extends to employees' immediate family members, including spouses, parents, and siblings. They should be mindful of any interests or activities that could compromise—or appear to compromise—an employee's judgment or ability to act solely in PMT's best interests.
- Employees should not accept or solicit gifts from suppliers, customers, or competitors, except for those of nominal value. This is particularly important when making decisions on behalf of Pollington Machine Tool.

3.4 Product Integrity

Product integrity is essential, and all products must be produced and tested in accordance with applicable quality and safety standards, ensuring they meet regulatory requirements and customer expectations. Employees and business partners are expected to uphold the highest standards of craftsmanship, reliability, and compliance throughout the production process. Any concerns related to product quality, safety, or compliance must be promptly reported and addressed to maintain our commitment to delivering superior and ethically manufactured products.

3.5 Confidentiality and Data Protection

Pollingtons is committed to protecting personal data and to processing it only within the boundaries of applicable law. Unauthorized use or disclosure of confidential employee and customer information is strictly prohibited. PMT safeguards data from misuse and ensures its secure storage, transmission, and processing in compliance with legal and contractual obligations.

3.6 Proper Use of Company Resources

We expect all employees to use company resources responsibly, efficiently, and for legitimate business purposes. Resources, including equipment, technology, funds, and confidential information, must not be used for personal gain or unauthorized activities. Employees are responsible for safeguarding company assets against loss, theft, misuse, or damage and must report any concerns immediately. Misuse of resources may result in disciplinary action, up to and including termination.

Every one of us is responsible for using our IT equipment and systems appropriately and securely, protecting PMT in the process. It is essential that our assets are not compromised, lost, damaged or misused.



3.7 Intellectual Property

Like many of our customers and suppliers, we invest significantly in developing intellectual property (IP), including patents, designs, copyrights, trademarks, trade secrets, and know-how, whether registered or unregistered. We recognize the serious harm that can result from the theft, misuse, or mishandling of IP, as such actions directly contradict our core values of honesty and integrity. As one of our most valuable business assets, IP must be protected, and we hold ourselves and each other accountable for ensuring its proper use.

4. Environmental and Social Responsibility

Pollington Machine Tool is dedicated to sustainable energy and environmental practices. We also prioritize minimizing any negative effects on the community while ensuring that the health and safety of the public are protected.

4.1 Commitment to Sustainability

Our company is committed to working towards reducing our environmental impact by improving resource and energy efficiency, sourcing materials sustainably, and minimizing waste, including air, water, and noise emissions. PMT complies with all applicable environmental laws, regulations, and industry standards, including obtaining and maintaining all required permits, approvals, and registrations while continuously monitoring and managing all production processes.

4.2 Reducing Environmental Impact

We actively monitor and work to minimize our use of natural resources, including water and energy.

- Prioritize the use of renewable and sustainable resources where feasible.
- Minimize waste throughout the product life cycle through recycling, reuse, and other conservation efforts.

4.3 Responsible Supply Chain Practices

Pollingtons is committed to sustainable and responsible sourcing, particularly in energy, minerals, and raw materials. We expect our suppliers to maintain transparency in their supply chains and ensure their practices do not contribute to human rights violations.

- Suppliers must conduct due diligence on the origin of raw materials to ensure responsible sourcing.
- Suppliers sourcing from conflict-affected regions should adhere to the OECD Due Diligence Guidelines.

All suppliers are required to agree with our Supplier Code of Conduct. By upholding these standards, we promote ethical sourcing practices and minimize environmental and social risks in our supply chain.

4.4 Community Engagement and Philanthropy

PMT is dedicated to making a lasting, positive impact on our communities through active engagement, philanthropy, and strategic partnerships. We collaborate with the local career technical center through cooperative education programs, providing students with valuable



hands-on experiences while fostering workforce development. Our support extends to organizations that provide essential grants, scholarships, and vital support programs to the residents within our communities. As advocates for education and local economic growth, we invest in resources that enhance student learning and strengthen businesses. Beyond financial contributions, we encourage and celebrate employees who take on leadership and volunteer roles, reinforcing our shared commitment to community well-being. Our dedication to corporate social responsibility is rooted in our core values of integrity, service, and responsibility, ensuring that our success is closely tied to the prosperity of the communities we serve.

5. Compliance and Accountability

5.1 Adherence to the Code & Governance

At Pollington Machine Tool, we have established and maintain robust management systems, comprehensive policies, well-defined procedures, accurate financial documentation, and effective training programs. This includes formal written policies that reflect executive-level commitment and accountability. These systems are regularly monitored, reviewed, and improved. PMT conducts periodic self-assessments of our operations and those of our suppliers to ensure compliance with this Code.

5.2 Reporting Violations and Whistleblower Protections

Employees are encouraged to raise concerns with their immediate supervisor or other management or the channel of their choice, who will escalate concerns on their behalf where appropriate. PMT maintains mechanisms that ensure confidentiality and protection from retaliation for employees or other stakeholders who report violations or concerns. We encourage openness and will support anyone who raises genuine concerns.

5.3 Disciplinary Action for Non-Compliance

Pollington Machine Tool expects all employees to adhere to this Code of Conduct as well as US laws and regulations. Non-compliance may result in disciplinary action, applied fairly and consistently based on the severity of the violation:

- **Warning:** Minor or first-time infractions will result in a warning (verbal or written), with guidance for correction.
- **Performance Improvement Plan (PIP):** Repeated or significant issues may lead to a PIP with specific goals and timelines.
- **Suspension or Termination:** Serious breaches, including illegal activity or gross misconduct, may result in suspension (with or without pay) or termination.

Actions will be determined case-by-case, ensuring fairness and compliance with labor laws. Employees may respond to allegations and appeal via grievance procedures. Legal action may follow if violations involve illegal conduct.

When in doubt, reach out to Human Resources.

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Approved By: Tom Wenn, General Manager