



Supplier Code of Conduct

Purpose & Scope

This Code applies to all suppliers, contractors, agents, and subcontractors providing goods or services to Placon. Suppliers must flow down these requirements to their own supply chains.

Legal & Ethical Standards

Suppliers must comply with all applicable laws and regulations in the countries where they operate.

Suppliers must not engage in bribery, corruption, extortion, or embezzlement.

Conflicts of interest must be disclosed to Placon immediately.

Human Rights & Labor Practices

No use of forced, bonded, indentured, or prison labor.

No child labor; minimum working age must meet legal requirements.

Respect for worker rights, including lawful freedom of association.

No discrimination or harassment of any kind.

Health & Safety

Provide a safe and healthy workplace that meets or exceeds applicable standards.

Identify and mitigate hazards through training, PPE, and engineering controls.

Maintain clean dormitories and canteens where provided.

Environmental Responsibility

Comply with environmental laws and regulations.

Minimize adverse environmental impacts by reducing waste, emissions, and consumption of resources.

Properly handle and dispose of hazardous materials.

Product Integrity & Quality

Meet contractual quality and safety requirements.

Implement processes to prevent counterfeit materials from entering the supply chain.



Cooperate with Placon in the event of a product recall.

Responsible Sourcing

Perform due diligence on high-risk materials such as conflict minerals, cobalt, or timber.

Provide traceability documentation when requested.

Information Security

Protect Placon's confidential information and intellectual property.

Comply with applicable data privacy laws.

Monitoring & Compliance

Placon reserves the right to conduct audits and inspections of supplier facilities and records.

Suppliers must maintain accurate records to demonstrate compliance with this Code.

Reporting & Whistleblower Protection

Suppliers must provide a mechanism for workers to report concerns without retaliation.

Reports can be made via Placon's Business Conduct Hotline: 608- 278-4990.

Enforcement & Consequences

Failure to comply with this Code may result in corrective action, suspension of business, or termination of the supplier relationship.

California Transparency in Supply Chains Act (SB 657) Disclosure

As required by the California Transparency in Supply Chains Act, Placon Corporation discloses the following regarding our efforts to eliminate human trafficking and slavery from our supply chains:

1. Verification – We do verify our product supply chains to evaluate and address the risks of human trafficking and slavery. Where verification is conducted, it is performed internally using risk-based assessments and supplier questionnaires.
2. Audits – We do not conduct audits of suppliers to evaluate compliance with our human trafficking and slavery standards.
3. Certification – We require direct suppliers to certify that materials incorporated into our products comply with the laws regarding slavery and human trafficking of the country or



countries in which they are doing business. This requirement is incorporated into our Supplier Code of Conduct and contractual terms.

4. Accountability – We maintain internal standards and procedures for employees, contractors, and suppliers who fail to meet our company standards regarding slavery and human trafficking. Violations may result in corrective action, up to and including termination of employment or business relationships.

5. Training – We do not provide training to employees and management who have direct responsibility for supply chain management. This training covers the identification and mitigation of risks of human trafficking and slavery, as well as the procedures for addressing suspected violations.

This section of our Supplier Code of Conduct serves as both an internal policy and our public disclosure under the California Transparency in Supply Chains Act. It will be made publicly available via a conspicuous link on our website homepage and provided in writing upon request within 30 days.