

Douglas Dynamics, LLC Supplier Code of Conduct

Labor & Human Rights

Human Dignity

Douglas believes all workers deserve ethical treatment, across our supply chain. All suppliers will treat each employee or contractor with dignity and respect, will not use corporal punishment, threats of violence or other forms of physical, sexual, psychological or verbal harassment or abuse. Supplier will make ensure that they are not complicit in human rights abuses.

Anti-Discrimination & Abuse

Supplier will not discriminate in hiring and employment practices, including salary, benefits, advancement, discipline, termination or retirement, based on race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, political opinion or disability. Supplier shall not require pregnancy or medical tests, except where required by applicable laws or regulations or prudent for workplace safety, and shall not improperly discriminate based on test results.

Forced Labor

Supplier will use only voluntary labor and will not use any forced, bonded, indentured, or convict labor. Involuntary labor can include transportation, harboring, recruitment, employment or other activity related to persons employed through threat, coercion, or fraud, abduction, or payments to any person having control over another person for the purpose of exploitation. Douglas holds suppliers responsible for the actions of third party recruiting firms hired to provide labor, and suppliers must ensure these firms are in compliance with this Code of Conduct.

Suppliers may not withhold government or travel documents from employees or contractors, or impose unreasonable restrictions on employee or contractor freedom of movement.

Child Labor

Supplier will assure that every employee is of working age. Child labor is prohibited. "Child" means a person younger than 15 (or 14 where local law allows, or, if higher, the local legal minimum age for employment or the age for completing compulsory education). Supplier must maintain consistent educational benefit and compliance with Article 6 of the ILO Minimum Age Convention No. 138 or Article 7 of the ILO Minimum Age Convention No. 138. Employees under 18 years of age shall not be required to work overtime or overnight and must only be employed in a manner that does not jeopardize their health, safety, or morals.

Workplace Conditions

Supplier will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations. The welfare of every worker is a top concern for Douglas; we require Supplier's workforce utilize Personal Protective Equipment in accordance all occupational health standards. Where a supplier provides housing it shall be sanitary and safe living facilities with access to clean toilet facilities and potable water.

Wages

Supplier will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, maximum hours, piece rates and other elements of compensation; and provide legally mandated benefits. Except in extraordinary business circumstances, Supplier will not require employees to work more than the limits on regular and overtime hours allowed by local law. Supplier will compensate employees for overtime hours at such premium rate as is legally required or, if there is no legally prescribed premium rate, at a rate at least equal to the regular hourly compensation rate. Any disciplinary wage deductions shall conform to local law.

Freedom of Association & Collective Bargaining

In accordance with local laws, Douglas respect employees' right to join, form, or not to join a labor union without fear of reprisal, intimidation, or harassment.

Environmental

Douglas is committed to partnering with suppliers who recognize that environmental responsibility is integral to a business relationship. In manufacturing operations, adverse effects to the environment and natural resources should conform to governmental regulations, while safeguarding the health and safety of employees and the public. Suppliers should work to fully integrate environmental stewardship into its business practices.

Hazardous and Non-Hazardous Materials

Suppliers will maintain a systematic approach to identify and manage hazardous and non-hazardous materials, compliant with local and international law. Supplier shall comply with current recycling and best practices to minimize impact of these materials.

Environmental Reporting

Supplier shall receive and maintain all required legal permits related to environmental and material handling requirements for their operations.

Prevention

Douglas expects suppliers, in addition to conforming to the legal requirements, to make every effort practical to reduce environmental damage through conservation, recycling and other mutually agreed upon best practices.

Douglas expects suppliers will maintain, and furnish upon request contingency plans in the event of natural disasters such as fires, floods, and other concerns.

RoHS

Where required, Douglas requires products to confirm to current RoHS & REACH standards as defined by the European Union, unless otherwise agreed in writing.

Ethics

Intellectual Property

Intellectual property and Douglas product, business or industry information help to provide a competitive advantage for our business. As such, Douglas expects that suppliers will respect these unique advantages and is willing to confirm their acceptance through execution of a Confidentiality Agreement.

Foreign Corrupt Practices Act (FCPA)

Suppliers shall not engage in corruption, extortion, embezzlement or bribery to obtain unfair advantage in any aspects of our business relationship. Suppliers shall abide by all applicable anti-corruption laws including the United States Foreign Corrupt Practices Act.

Whistleblower Protections

Suppliers shall provide an anonymous mechanism for reporting of violations within their operations, and prohibit retaliation against “whistleblowers” for such reporting. “Whistleblower” is defined as any worker reporting illegal or unethical information.

Supplier Diversity/Inclusive Supply Chain

Suppliers are to demonstrate a diverse workforce composition actively embracing workforce age, gender, race, national or ethnic origin, religion, language, political beliefs, sexual orientation, physical ability and promoting supply chain inclusion throughout their own supply chains.

Compliance & Obligations

Confidentiality

Suppliers must protect our customers, employees and client's privacy and confidentiality in accordance with the terms of the agreement. All Suppliers must sign a Non-Disclosure Agreement (NDA) with Douglas and adhere to the terms therein.

Data Protection/ Privacy

Suppliers shall comply with applicable privacy and information security laws and associated regulatory requirements as well as with the Douglas' privacy and security policies when personal information is collected, stored, processed, disclosed, transferred and/or shared.

Sub-Contractors

Supplier will not use subcontractors for the provision of goods or services to Douglas unless the subcontractor has entered into a written commitment with the Supplier to comply with this Code of Conduct. Douglas requires advance notification from Supplier and written approval prior to the start of production if a subcontractor is used in manufacturing of any portion of a purchase order.

Conflict of Interest

Suppliers should inform Douglas of all actual and potential conflicts of interest that come up from business or personal relationships with our customers, suppliers, business associates, employees, or competitors.

Conflict Minerals

Supplier will exercise due diligence to ensure responsible and compliant sourcing of minerals; compliance with OECD Due Diligence Guidance for Responsible Supply Chain Minerals from Conflict and High Risk Areas is recommended. Suppliers are required to be able to, upon request, certify they are free of conflict minerals.

Compliance

Supplier hereby authorizes Douglas to confirm compliance by Supplier with this Code of Conduct, including on-site inspections of manufacturing facilities and employer-provided housing. Supplier will maintain at its facilities all documentation that may be needed to demonstrate compliance with this Code of Conduct.

Supplier will comply with all applicable laws and regulations, including those pertaining to the manufacture, pricing, sale and distribution of merchandise. All references to "applicable laws and regulations" in this Code of Conduct include local and national regulations.

Supplier will take appropriate steps to ensure that the provisions of this Code of Conduct are communicated to employees and subcontractors as appropriate.

Failure by any supplier of Douglas or subcontractor of the supplier to comply with this Code of Conduct is grounds for immediate termination with cause, of all purchase orders and any Supplier agreement without liability on the part of Douglas. Upon completion of our business relationship, Douglas requires the return of all documentation and Douglas purchased tooling used by a supplier.

Douglas values open and honest communication; in the event a Supplier determines there is any violation of this Code of Conduct shall immediately report and correct the issue.

Douglas Dynamics Code of Conduct accepted by _____ (company name) and current and future compliance certified by the following senior executive of the company.

Supplier Representative

Douglas Dynamics

By: _____

By: _____

Name:

Name:

Title:

Title:

Date:

Date: