



Supplier Code of Conduct

In Grouper Acquisition Company dba Shiloh Industries LLC (“Shiloh”), as a global company, we seek to be a good corporate citizen in our dealings with customers, suppliers, employees and the communities where we are based across the world. In order to ensure alignment across the supply chain, Shiloh expects its suppliers to adhere to our core business principles.

The Code of Conduct sets out the minimum standards expected of our suppliers so they act ethically, responsibly and in compliance with applicable laws and regulations.

Ethical Dealings

Suppliers must not offer gifts or favors to Shiloh employees in an attempt to inappropriately influence business decisions. All suppliers must conduct their business to a high ethical standard and comply with applicable laws and regulations on bribery, corruption and prohibited business practice.

Health, Safety and Environment

Suppliers will make proper provision for the health, safety and welfare of their employees, visitors and contractors and those in the community who may be affected by their activities. A safe working environment should be provided and appropriate occupational health and safety practice promoted.

Suppliers will conduct their business in ways which protect and preserve the environment and will comply with applicable environmental laws and regulations.

Employment Standards

- **Employee Involvement:** Suppliers should respect employees’ right to form, join or not to join a labor union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, suppliers will bargain in good faith with their freely chosen representatives to the extent required by applicable law.
- **Nondiscrimination:** Suppliers will maintain workplaces that are free from discrimination or physical or verbal harassment. The basis for recruitment, hiring, placement, training, compensation and advancement should be qualifications, performance, skills and experience. **Pay and Benefits:** At a minimum, suppliers will comply with applicable laws and regulations on pay and benefits.
- **Working Hours:** Suppliers are expected to comply with applicable laws and regulations on working hours.
- **Child and Involuntary Labor:** Suppliers must refrain from using any form of child, forced, involuntary or debt bonded labor.

Proprietary Information

Any information our suppliers receive through business dealings with Shiloh must be kept confidential and never used for personal gain. This includes both commercial and technical



information. Refer to the Shiloh Terms and Conditions or nondisclosure agreements, where they exist, for details on obligations relating proprietary and confidential agreements.

Monitoring / Record Keeping

Our suppliers are solely responsible for their compliance with this Code of Conduct and must be able to demonstrate their compliance to Shiloh satisfaction. Shiloh and its agents have the right engage in monitoring activities (including on-site inspections and reviews of books and records) to assess compliance.

If a supplier fails to uphold any aspect of the Code of Conduct, the supplier is expected to implement corrective actions. Shiloh reserves the right to terminate an agreement with any supplier that cannot demonstrate that they are upholding the Code of Conduct.

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