

Dura-Belt's Ethical Compliance & Social Responsibilities

1. Slavery and Human Trafficking Policy

1.1 Statement of Intent

We maintain a zero-tolerance approach to slavery, human trafficking, forced labor, and bonded labor in all forms. We are committed to acting ethically and with integrity in all of our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure slavery is not taking place anywhere in our own business or in any of our supply chains.

1.2 Scope

This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, and third-party representatives.

1.3 Key Compliance Standards

- **Voluntary Employment:** All work must be voluntary. Employees must have the freedom to terminate their employment in accordance with established notice periods.
- **Identity Documents:** Dura-Belt strictly prohibits the withholding or destruction of employee identity documents, passports, or work permits.
- **Recruitment Fees:** Workers shall not be charged recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, they must be repaid.
- **Child Labor:** We strictly prohibit the employment of child labor under any circumstances, adhering strictly to local legal minimum age requirements.

• 1.4 Reporting Violations

Employees are required to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains at the earliest possible stage. Reports can be made confidentially to any of Dura-Belt's Officers and/or Dura-Belt's Board of Directors.

2. Anti-Bribery & Corruption Policy

2.1 Statement of Intent

We are committed to conducting business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships globally.

2.2 Prohibited Conduct

- **Bribes:** We must not give, promise to give, offer, or request, agree to receive, or accept a financial or other advantage to influence a business outcome improperly.
- **Kickbacks:** We do not accept or make "kickbacks" of any kind. All teams must ensure that payments made in the course of business are legitimate and authorized.
- **Facilitation Payments:** We do not make facilitation payments or "grease payments" to government or public officials to secure or expedite routine administrative actions.

2.3 Gifts, Hospitality, and Expenses

This policy does not prohibit normal and appropriate hospitality or entertainment given to or received from third parties, provided it meets the following criteria:

- It is not made with the intention of influencing a third party to obtain or retain business or a business advantage.
- It complies with local law and is given in the company name, not an individual's.
- It does not include cash or a cash equivalent (such as gift certificates or vouchers).
- It is of an appropriate, insignificant value and declared transparently.

2.4 Record-Keeping

We must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. All accounts, invoices, and other documents and records relating to dealings with third parties must be prepared and maintained with strict accuracy.

3. Equality, Diversity, and Inclusion Policy

3.1 Statement of Intent

We are dedicated to encouraging supportive and inclusive environments for all employees. Our goal is to ensure that all employees and job applicants are given equal opportunity and that our organization is representative of all sections of society. Each employee will be respected and valued.

3.2 Non-Discrimination

We will not discriminate directly or indirectly against any individual based on:

- Race, color, nationality, or ethnic origin
- Sex, gender identity, or sexual orientation
- Age
- Disability or chronic medical conditions
- Religion or philosophical belief
- Marital, civil partnership, or parental status

This commitment applies to all aspects of employment, including recruitment, promotion, opportunities for training, pay and benefits, discipline, and selection for redundancy.

3.3 Anti-Harassment and Bullying

We are committed to providing a working environment free from harassment and bullying, where everyone is treated with dignity. Harassment is any unwanted conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating, or offensive environment. Such behavior will not be tolerated and will be subject to disciplinary action, up to and including termination. This applies to any type of harassment or bullying of our employees both on and off Dura-Belt's property.

4. Ethical Sourcing Policy

4.1 Statement of Intent

We recognize that our procurement choices have a substantial impact on the environment and the communities in which our suppliers operate. We commit to selecting business partners and suppliers who share our values regarding ethical conduct, human rights, and environmental responsibility.

4.2 Supplier Requirements

All suppliers, vendors, and contractors are expected to adhere to our Supplier Code of Conduct, which includes the following mandates:

- **Safe Working Environment:** Provide a clean, safe, and healthy working environment for all employees, minimizing hazards and preventing accidents.
- **Fair Compensation:** Pay legal minimum wages or prevailing industry wages, whichever is higher, and provide all legally mandated benefits.
- **Working Hours:** Ensure working hours comply with national laws and benchmark industry standards, avoiding excessive mandatory overtime.
- **Environmental Responsibility:** Minimize the environmental footprint of operations, properly manage waste, and strive to lower carbon emissions and resource consumption.

4.3 Monitoring and Verification

We reserve the right to verify compliance with this Ethical Sourcing Policy. Failure to comply or cooperate with reviews may result in the termination of the business relationship.