



**CODE OF
CONDUCT**

2024

Contents

Composites One | Code of Conduct 2024

3	Introduction
4	Message from our CEO
5	Our Vision
6	Our Core Values
7	Business Conduct Principles
11	Privacy
12	Reporting Concerns
13	Contact Us

Introduction

Composites One | Code of Conduct 2024

Composites One is the largest distributor of composites materials in North America.

Composites One offers the industry's widest range of reinforcements, resins, gel coats, catalysts, core materials, shop supplies and process equipment, including more specialized materials than any other supplier. With more than 40 distribution centers across North America, we serve more than 9,000 customers in a variety of markets, including Marine, Aerospace, Wind Energy, Transportation, Construction and Advanced Composites. Composites One provides customers with unmatched technical expertise and the industry's largest Team of Technical Sales Representatives, most of whom are CCT Certified.

When customers call Composites One, they will be treated to incomparable local customer service from a Team ready to serve. Team Members like Customer Service Representatives, Drivers, Technical Sales Representatives and Technical Support Managers are eager to partner with their customers, working with them to ensure the success of their business.

Our Code of Conduct ensures our customers are provided value-added services with only the utmost integrity and honesty – the heart of our Core Values.

Message from our CEO

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Doing the right things for the right reasons is critically important at Composites One and is directly linked to our Core Values. We work hard every day to provide products that enhance the lives of people in our community, and in the countries in which we operate around the world.



We are clear about what we mean when we talk about doing things right. Not only does it mean that we provide products that are well made, fair-priced and of exceptional quality, but it also means that every step we take in distributing those products is taken with integrity, respect, and ethical behavior as a foundation. We work diligently to source products from suppliers who share that same commitment to ensure our supply chain is in compliance with our Code of Conduct.

Doing the right things for the right reasons is not an option at Composites One. Working here means making a commitment to uphold our company Core Values and following the Code of Conduct outlined in this document. Thank you for your continued confidence in Composites One and helping us to be the best product supplier we can be.

A handwritten signature in black ink, appearing to read "Leon Garoufalis". The signature is fluid and cursive, written over a white background.

Leon Garoufalis
President & CEO

Our Vision

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Composites One will be valued by our customers as the most dynamic, innovative and dependable supplier of composite materials.

Our Core Values

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Composites One is a values-driven organization. Our Core Values guide all our actions.



Composites One is a values-driven organization. Our Core Values guide all our actions:

- Act with honesty and integrity.
- Create value for our customers.
- Work as a Team and respect each other.
- Commit to quality excellence, continual improvement, and innovation.
- Commit to safety, health, and environmental responsibility.
- Drive success and appreciate achievement.



The foundation of all strong relationships is trust. Only by acting with honesty and integrity in all interactions with our customers, our suppliers and each other will we build and secure meaningful, trusting relationships. We expect everyone to uphold our core values which are consistent with our reputation in the composites market and related industries.



With our strong focus on our customers and our commitment to meeting customers' expectations, Composites One has developed a Code of Conduct to clarify our global expectations in the areas of business integrity, labor practices, health and safety of employees and environmental management. This Code of Conduct applies to all employees across the organization including officers and directors, along with affiliated entities, including short-term contractors or temporary employees.



Composites One expects all suppliers, vendors, contractors and other providers of goods and services who do business with Composites One to share the principles expressed in this Code of Conduct. Moreover, we expect our suppliers to uphold these standards by representing them throughout the entire supply chain.



Business Conduct Principles

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We expect everyone engaged in business with Composites One to act with honesty and integrity, comply with all applicable laws and regulations of the countries of operations and adhere to the following principles:

Ethical Business Practices

Anti-Corruption, Anti-Trust, Anti-Bribery and Fair Competition

Comply fully with the U.S. Foreign Corrupt Practices Act and other applicable anti-corruption laws (e.g., the UK Bribery Act), directives and/or regulations that govern operations in all countries of business operations.

Compete fairly for Composites One's business without paying bribes, kickbacks or giving anything of value to secure an improper advantage.

Composites One is committed to fair competition and conducting business legally and ethically within the framework of a free enterprise system. Corrupt arrangements with customers, suppliers, governmental officials, or other third parties are strictly prohibited. We never engage in bribery or corrupt behavior, and we do not allow anyone to do so on our behalf. Compliance with all applicable anti-trust, anti-bribery, and competition laws in all countries of business operations is required.

Prohibit provision of gifts and entertainment and avoid conflicts of interest when dealing with Composites One Team Members.

Entertainment and gifts that could inappropriately influence business decisions or gain an unfair advantage are strictly prohibited.

Notification is required to all affected parties if an actual or potential conflict of interest arises. If there is a perceived conflict, attempt to avoid the conflict. If it cannot be avoided, it must be disclosed and discussed openly.

Business Conduct Principles cont...

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Export Controls and Trade Compliance

Composites One is committed to compliance with all export controls in the Export Administration Act and the Export Administration Regulations. This commitment extends to promoting strict compliance on an ongoing basis with terms and conditions. We expect all business partners to comply with all applicable international trade laws and regulations, including import, export, and re-export control regulations, as well as applicable embargoes, sanctions, and anti-boycott laws.

Human Rights

Prohibit Use of Child Labor.

Ensure that illegal child labor is not used in the performance of work. It is prohibited to employ any person under the age of the applicable local statutory minimum age limit for employment, or the age for completing compulsory education.

Human Trafficking, Modern Slavery and Forced Labor.

All work shall be performed on a voluntary basis, and workers shall be free to terminate their work upon reasonable notice. Composites One does not tolerate use, or benefit from, any form of involuntary or forced labor, including indentured, bonded, slave, or prison labor. Composites One does not tolerate use, condone, nor participate in any form of slavery or human trafficking. Recruiting, hiring, transporting, or obtaining persons by means of threat, force, coercion, fraud, or other means for the purpose of exploitation is prohibited. Adhere to all regulations prohibiting human trafficking, modern slavery and forced labor; including but not limited to, The Uyghur Forced Labor Prevention Act (UFLPA), and comply with all applicable local laws in the country or countries of business operation. This includes ensuring compliance through the value chain.

Business Conduct Principles cont...

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Tax Evasion and Money Laundering

Conduct business with reputable business partners, involved in legitimate business, using funds from legitimate sources. Comply with all applicable financial laws in all countries of business operations.

Maintain a Fair and Safe Workplace

Maintain a Fair Workplace

Encourage a diverse workforce and provide a workplace free from discrimination, harassment, or any other form of abuse.

Providing a safe work environment in which employees and business partners feel valued and respected for their contributions is critical. Harassment of any kind shall not be tolerated. Employment decisions must be based on qualifications, skills, performance, and experience. Employees must feel safe speaking up and a hotline or resource is available to report any concerns anonymously.

Treat employees fairly, including with respect to wages, working hours and benefits.

Comply with all applicable legal and regulatory requirements and apply sound employee relations practices. Working hours, wages and benefits will be consistent with laws and standards.

Prohibit all forms of forced or compulsory labor.

Maintain and promote fundamental human rights. Employment decisions shall be based on free choice. No forms of forced and compulsory labor shall be used.

Respect employees' right to freedom of association and collective bargaining, consistent with local laws.

Business Conduct Principles cont...

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Maintain a Safe Workplace

Provide safe and healthy working conditions.

Safety is everyone's responsibility. It is important to proactively manage health and safety risks to provide an environment where occupational injuries and illnesses are prevented. Employee exposure to potential safety hazards shall be minimized by identifying, assessing, and mitigating risks by developing and implementing plans and procedures. Provide training to ensure employees are trained and educated on applicable safety and health matters.

Carry out operations with care for the environment and human health by complying with all applicable environmental laws and regulations.

There shall be systems in place to ensure the safe handling, movement, storage, recycling, reuse and management of waste, air emissions and wastewater discharges. There shall be systems in place to prevent or mitigate accidental spills and releases into the environment.

Privacy

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Confidential Information

All proprietary and confidential information, which includes all nonpublic information, whether written or oral, that Composites One LLC has a legitimate business interest in protecting, must be kept confidential. This includes technical, design, or process data, improvements, new products, products in development, intellectual properties, models, manuals, knowledge, financial data, pricing information, business development or acquisition plans, marketing plans, project practices, and customer and supplier lists.



Data Privacy

The privacy of employees, customers, suppliers, and other third parties must be respected, and steps taken to safeguard data privacy. Personal information and sensitive data must be protected and there must be compliance with all applicable privacy, information security and data protection laws, including the EU General Data Protection Regulation and the U.K. Data Protection Act 2018.

Breaches of the Code of Conduct can carry serious consequences; reputational harm, injury, non-compliance with legal and regulatory standards and even fines and criminal punishment. At its sole discretion, Composites One reserves the right to take appropriate action, up to and including termination of employment, contracts and agreements for legal violations or breach of this Code of Conduct.

Reporting Concerns

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Reporting Your Concerns

Violations of this Code of Conduct are taken very seriously and investigated as appropriate. If you have a concern regarding suspected unethical, illegal, or unsafe activity in our organization, we encourage employees to report it to your manager or next level management. Alternatively, employees and business partners can call our Ethics Hotline toll-free in countries of operation listed, or report via the internet using the link and code provided below.

ETHICO HOTLINE NUMBERS

United Kingdom	0800-090-3371
Mexico	800-681-9386
Brazil	0800-900-0342
France	0-805-98-56-49
Italy	800-796-084
U.S. / Canada	866-842-7093

Web URL: <https://www.mycompliancereport.com/report?cid=COMP1>

Company Account Code: COMP1

Contact Us

Composites One | Code of Conduct 2024

Contact

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