



# Code of Conduct

SOUTHWORTH INTERNATIONAL GROUP, INC.  
Version 2.0



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## 1. Letter from our CEO

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Southworth International Group, Inc. ("SIGI") and our subsidiary companies build products and provide services that make work faster, safer, and easier and life better for thousands of people around the world. This has been our mission and our focus since 1890.

Our company has many assets, both physical and intangible. Of all of these, without a doubt the most important are our core values and our reputation, which guide and reflect the way we do business. We conduct our business with the highest ethical standards and in strict compliance with applicable laws and regulations. This has been our way of doing business for more than 135 years.

Our Code of Conduct outlines the key policies and guidelines that define and reinforce our commitment to doing business the right way. It is a critical document. Please take the time to read and understand it. If anything is unclear, please ask. If after reading this document, you or someone around you has a question about proper conduct in general or in a specific situation, please ask. Ask your manager, access Red Flag Reporting via email, telephone or postal mail or contact our senior leadership team directly. We will address your concerns promptly and professionally. I assure you that retaliation for reporting improper or potentially improper conduct is not acceptable and will not be tolerated in our company.

Our company is committed to doing business the right way, wherever we are doing business. Thank you for taking the time to read and understand our Code of Conduct and thank you for staying true to our values and for maintaining the highest ethical standards in all that you do. This is our way of doing business and it defines who we are as a company.

Yours sincerely,

A handwritten signature in cursive script that reads "James Cabot".

James E. Cabot



## 2. Why We Have a Code of Conduct

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SIGI and its subsidiary companies believe that the manner in which we conduct business is as important as the business that we do. Operating with integrity and the highest ethical standards provides a strong foundation for SIGI's success. Our Code of Conduct reinforces our values by providing a framework of ethical standards within which all employees must operate. This document should be used as a reference guide for all employees to conduct our business in an ethical and appropriate manner.

Every employee of SIGI has an obligation to read and understand our Code of Conduct. Our Code is intended to be read in conjunction with regional employee handbooks and is not intended to interfere with or limit the rights that employees have under local laws. If a local custom, culture, or law sets a different standard than what is described in the Code, then you should speak to your local Human Resources Department for guidance.

## 3. Red Flag Reporting Hotline

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If you know of, or have any reason to suspect, any conduct that is in violation of applicable laws, company policy, or our Code of Conduct, you have a responsibility to share your concern. You may speak with your manager, your Human Resources manager, or place an anonymous report through our Ethics and Compliance Hotline.

SIGI prohibits any threats or acts of retaliation against any personnel who in good faith seeks advice, raises a question or concern, makes a report, or assists the company in identifying or investigating actual misconduct or violation of company policy or of any anti-corruption law. Any such retaliatory conduct will not be tolerated and is subject to disciplinary action up to and including immediate termination. Any person who believes that he or she has been subjected to any threats or acts of retaliation should report that concern immediately.

There are three ways to file an anonymous report:

**1. Online:** Visit [www.RedFlagReporting.com/Southworth](http://www.RedFlagReporting.com/Southworth)

**2. Call:**

1. USA Toll-Free: 1-888-580-8160
2. USA Toll: 1-916-915-9466
3. Sweden Toll-Free: 46-20-075-3505

\*Push 1-English, 2-Spanish, 3-Mandarin, 4-Swedish

**3.** You may also use the following (make sure to be detail-oriented, provide our organization's name, and indicate whether you wish to be anonymous):

1. **Fax** to 1-330-572-8146 (USA Number)
2. **Email** to [redflag@redflagreporting.com](mailto:redflag@redflagreporting.com)

**Mail** to Red Flag Reporting, P.O. Box 4230, Akron, Ohio 44321, USA



## 4. Our Mission, Vision and Values

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### Our Mission

We make the toughest material handling work faster, safer, and easier by creating customized vertical work positioning solutions and services designed to improve productivity and safety.

### Our Vision

Our vision is to be the global leader in the design, development, manufacture, distribution, and support of solutions and services to make material handling safer and more productive. We work closely with our customers to create and deliver innovative and customized solutions to their most challenging material handling problems. And we conduct business at a level of value and service that causes channel partners and end users to prefer our brands to all others. In fulfilling our vision, we are creating a better future for each of our stakeholders: our customers, our employees, and our shareholders, as well as for the communities in which we do business.

### Our Values

#### Customer Focus

Our success depends on our customers' success. We support, educate, and provide our customers with the quality and service they need, and we strive to exceed their expectations.

#### Collaboration

We embrace a spirit of collaboration and teamwork with our fellow colleagues, customers, and suppliers. We seek to help each other to be successful, recognizing each other's knowledge and appreciating the power of diversity. We invest in and develop talent. We care for one another as a team.

#### Commitment

We are proud of our legacy and have a passion for safety and ergonomics. As individuals, we take initiative, learn from our mistakes, and are focused on continuous improvement. As a group, we work toward clear objectives and expect great results.

#### Commercial Orientation

We are developing our business for the long-term, every day. We are professional, business-minded, and believe in an entrepreneurial spirit that allows us to take calculated risks and create profitability through increased customer value. We recognize and celebrate success because success enables new opportunities.

#### Community

We are building community based on honesty, transparency, and trust. Trust is established by respecting and caring for each other, being straightforward, and providing clear and constructive feedback. We listen actively to understand each other's intentions and are honest and trustworthy in our relationships. As we seek to build a strong company community, we also seek to be an asset to the many communities in which our company does business. Mindful of our wider impact on those around us, we use the company's, and the world's, resources wisely.



## 5. Our Commitment to a Fair and Safe Workspace

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SIGI is committed to respecting human rights. We have established certain standards designed to protect human rights and expect our suppliers and business partners to follow these standards.

### **Protect Against Child Labor**

Child labor is prohibited. The minimum age for employment of work is 16 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher. This does not prohibit participation in legitimate and lawful workplace apprenticeship programs.

### **Protect Against Forced Labor and Abuse of Labor**

SIGI strictly prohibits the use of involuntary labor and human trafficking. SIGI and its suppliers shall not traffic in persons or use any form of slave, forced, bonded, indentured or involuntary prison labor. This includes transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, coercion, abduction, fraud or payments to any person having control over another person for the purpose of exploitation. SIGI and its suppliers may not engage in destroying, concealing, or confiscating identity or immigration documents, using fraudulent recruiting tactics, or charging employees unreasonable recruitment fees or providing inadequate housing based on local standards, laws and directives.

### **Prohibit Harassment**

SIGI ensures a workplace that is free of harassment. Examples of conduct that could be characterized as “harassment” include, without limitation, threatening or subjecting workers with harsh or inhumane treatment, sexual harassment, offensive jokes, slurs, epithets or name calling, physical assaults or threats, intimidation, ridicule or mockery, insults or put-downs, offensive objects or pictures, and interference with work performance.

### **Prohibit Discrimination**

We are committed to ensuring an equitable workplace where each employee can reach his or her full potential regardless of cultural background, sex, gender identity or expression, sexual orientation, marital status, military status, race, color, national origin, ethnicity, religion, creed, age, or disability.

### **Comply with Work Hour, Wage and Benefit Laws**

SIGI is committed to and requires all their suppliers to pay their workers at least the minimum wage required by applicable laws and regulations of their respective countries. They must also provide all legally mandated benefits. SIGI and its suppliers must comply with all applicable maximum working hours laws and must compensate workers for overtime hours at or above the rate required by said laws.

### **Provide a Safe and Healthy Workplace**

SIGI provides a safe and healthy workplace by actively working to prevent accidents, injuries, and occupational illnesses through structured safety programs and policies. These include regional wellness initiatives, daily and weekly safety meetings across global locations, and systematic audits and reporting mechanisms to ensure continuous improvement and compliance. In addition, SIGI adheres to all government mandated safety protocols.

### **Demonstrate Good Corporate Citizenship**

We support the communities in which we live and work. We strive to improve the quality of life in these communities by providing high-quality employment opportunities and through support for education, community development, and other locally relevant initiatives. Our employees are active in our communities, volunteering and participating in community service.

## 6. Environmental Stewardship

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At SIGI, environmental stewardship is a core component of how we operate and engage with our communities. We recognize that protecting the environment is a global responsibility and a local imperative. Our commitment is reflected in the following principles:

### Environmental Impact

SIGI complies with all applicable environmental laws, regulations, and standards. We hold ourselves and our suppliers accountable for minimizing environmental impact and adhering to sustainable practices.

### Resource Conservation

We actively work to conserve natural resources and energy, reduce or eliminate the use of hazardous substances, and promote recycling and waste reduction across our operations.

### Sustainable Business Practices

SIGI is committed to understanding and measuring our environmental impact. We continuously seek innovative and sustainable ways to conduct business, ensuring that our operations do not harm the environment or the quality of life in the communities where we operate.

### Supplier Engagement

Through our supplier onboarding process we require all strategic partners to review and sign SIGI's Code of Conduct. This includes commitments to ethical and environmentally responsible business practices, compliance with chemical composition disclosure requirements, and alignment with SIGI's sustainability goals.

### Community Impact

We take proactive measures to ensure our activities support the health and well-being of our communities. This includes volunteering, community service, and initiatives that promote environmental awareness and action.

## 7. Anti-Bribery and Anti-Corruption

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SIGI is committed to upholding the highest professional and ethical standards and to complying with the anti-bribery and anti-corruption laws of all the countries in which we do business.

SIGI prohibits our personnel and anyone else acting on our behalf from paying, giving, offering, or promising any bribe, kickback, or other corrupt payment of anything of value to any person with the intent to improperly influence the obtaining or retaining of business, or to gain an improper business advantage for ourselves or our customers. SIGI personnel may not make such payments themselves, and may not authorize, direct, or permit others – including agents, consultants, or other representatives – to make such payments on the company's behalf.

### Permissible Gifts, Meals and Entertainment and Travel or Other Expense Reimbursement

A small gift or token of esteem or gratitude is often an appropriate way to display respect for a customer, customer representative or service provider. Any such gifts or tokens of esteem or gratitude must have a good faith business or promotional purpose and must be of modest value.

## Policy Statement

Any provision of meals and entertainment, or reimbursement of travel or hotel expenses, must be a good faith expenditure with a legitimate business purpose, related directly to the promotion, demonstration, or explanation of our services, or to the performance of a project for a customer. Any such expenditure must be lawful under local law and US law and must be reasonable in value. To ensure transparency and integrity in business relationships, the following guidelines must be followed:

### Acceptable Gifts:

- Nominal value items (e.g., branded pens, mugs, calendars) not exceeding:
  - AMS: \$100 per item
  - EMEA: kr 940 per item
  - APAC: CN¥430 per item
- Occasional meals or entertainment if directly related to business and not excessive.
- Holiday or appreciation gifts with a total annual value not exceeding:
  - AMS: \$250
  - EMEA: kr 1600
  - APAC: CN¥1000

### Prohibited Gifts:

- Cash or cash equivalents (e.g., gift cards, prepaid debit cards).
  - Exceptions to this require written authorization from an officer of the company (CEO or CFO).
- Lavish or frequent gifts that may influence business decisions.
- Personal services or favors from vendors.

### Disclosure and Approval:

All gifts exceeding the limits stated above must be reported to an employee's Senior Business Leader and HR Business Partner. Gifts over the annual limits stated above require written approval from the employee's department manager and the Human Resources Department.

## 8. Export Control

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It is the express policy of SIGI to comply with all export control and sanctions laws and regulations of the countries in which we do business, as well as with relevant American, British, Chinese, Swedish, German and European Union laws and regulations. This policy applies to all directors, officers, employees, and third-party contractors of all SIGI departments and subsidiaries. SIGI is committed to ensuring that all transactions undertaken by anyone operating on behalf of SIGI, including third parties, are in compliance with applicable export control and sanctions laws.

This policy requires the following:

- All employees and contractors must fully understand how export control and sanctions laws apply to the work that they do, participate fully in all compliance training, report any potential compliance issues to the appropriate compliance personnel, maintain accurate records, and ask questions if they are uncertain as to what requirements – including American, British, Chinese, Swedish, German and European Union restrictions – might apply.

SIGI does not engage in any business with parties that are sanctioned by the United States or other governments of other countries in which we are domiciled.



## 9. Information Security

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At SIGI, safeguarding our operations against unauthorized access and use is a collective responsibility. While SIGI implements robust technical measures at the infrastructure level to ensure a secure environment, every employee plays a critical role in maintaining the integrity and security of our operations.

### Information Security Responsibilities

To ensure a secure operational environment, all employees are expected to adhere to the following practices:

#### Complete Mandatory Cybersecurity Training

Stay up to date with all monthly required cybersecurity training and apply the knowledge and skills acquired.

#### Use Strong, Confidential Passwords

Create complex passwords, keep them confidential, and enable Multi-Factor Authentication (MFA) for enhanced security where available.

#### Monitor Physical Security

Remaining vigilant to prevent unauthorized access to SIGI's physical facilities.

#### Guard Against Social Engineering

Exercise caution with phone calls and emails that may involve social engineering tactics. Verify the legitimacy of unusual requests before acting, including clicking links or sharing sensitive information verbally or via email.

#### Handle Suspicious Emails with Care

Scrutinize unfamiliar email requests. Avoid clicking links within suspicious looking emails and report them promptly using the phish alerting system.

#### Report Security Incidents

Immediately report any confirmed or suspected incidents involving the loss, theft, misuse, or unauthorized access to information systems and physical locations.

#### Promote Security Best Practices

Advocate for current information security standards and best practices among colleagues, vendors, and customers.

#### Compliance

SIGI actively monitors controls to ensure ongoing compliance with NIST Cybersecurity Framework 2.0, enabling real-time adherence and rapid response to maintain security standards.

By diligently following best practices, we collectively strengthen SIGI's security posture and protect our operations from potential threats.

## 10. Data Privacy

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SIGI is dedicated to ensuring that all personal information relating to its employees, contractors, service providers, customers, and vendors is secure and follows all rules and regulations set forth by the countries in which we conduct business, including General Data Protection Regulation (GDPR) or equivalent country level regulations.

SIGI collects personal information for different purposes:

- Comply with our obligations to you as a customer.
- Enable general customer care and customer service.
- Facilitate payments for services provided.
- Provide information and targeted marketing.
- Prevent fraud and risk management.
- Follow applicable legislation, such as denied party screening.

Personal information will only be stored if it is necessary to fulfill the purposes for which the data was collected.

## 11. Intellectual Property

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SIGI is committed to a high level of legal and ethical standards in the conduct of our business. It is the policy of SIGI to compete fairly in the marketplace. This commitment to fairness includes respecting the intellectual property rights of our suppliers, customers, business partners, competitors, and others, including original equipment manufacturers and other independent service organizations. No company employee, independent contractor, or agent should steal or misuse the intellectual property rights owned or maintained by another.

In addition, SIGI is committed to protecting its own intellectual property, such as information, processes, engineering drawings, and technology from infringement by others. It is the responsibility of every SIGI employee to help protect SIGI intellectual property. It is the responsibility of SIGI managers and supervisors to foster and maintain awareness of the importance of protecting SIGI's intellectual property.