



WORTHINGTON  
ENTERPRISES

# SUPPLIER CODE OF CONDUCT

JUNE 2025



## OUR PHILOSOPHY

**Our deeply held Philosophy**  
is rooted in the Golden Rule –  
we treat our customers, employees,  
investors, and suppliers  
as we would like to be treated.

## Our Philosophy

### EARNINGS

Our first corporate goal is to earn money for our shareholders and increase the value of their investment.  
We believe that the best measurement of the accomplishment of our goal is consistent growth in earnings per share.

### OUR GOLDEN RULE

We treat our customers, employees, investors and suppliers, as we would like to be treated.

### PEOPLE

We are dedicated to the belief that people are our most important asset.  
We believe people respond to recognition, opportunity to grow and fair compensation.  
We believe that compensation should be directly related to job performance and therefore use incentives, profit sharing or otherwise, in every possible situation.  
From employees we expect an honest day's work for an honest day's pay.  
We believe in the philosophy of continued employment for all Worthington people.  
In filling job openings every effort is expended to find candidates within Worthington, its divisions or subsidiaries.

### CUSTOMERS

Without the customer and their need for our products and services we have nothing.  
We will exert every effort to see that the customer's quality and service requirements are met.  
Once a commitment is made to a customer, every effort is made to fulfill that obligation.

### SUPPLIERS

We cannot operate profitably without those who supply the quality materials we need.  
We ask that suppliers be competitive in the marketplace with regard to quality, pricing, delivery and volume purchased.  
We are a loyal customer to suppliers who meet our quality and service requirements through all market conditions.

### ORGANIZATION

We believe in a divisionalized organizational structure with responsibility for performance resting with the head of each operation.  
All managers are given the operating latitude and authority to accomplish their responsibilities within our corporate goals and objectives.  
In keeping with this philosophy, we do not create excessive corporate procedures. If procedures are necessary within a particular company operation, that manager creates them.  
We believe in a small corporate staff and support group to service the needs of our shareholders and operating units as requested.

### COMMUNICATION

We communicate through every possible channel with our customers, employees, shareholders, suppliers and financial community.

### CITIZENSHIP

Worthington practices good citizenship at all levels.  
We conduct our business in a professional and ethical manner.  
We encourage all our people to actively participate in community affairs.  
We support worthwhile community causes.

Originally written by Worthington Industries Founder John H. McConnell



# SUPPLIER CODE OF CONDUCT

Worthington Enterprises, Inc. is committed to working with suppliers who share our values and are dedicated to conducting business lawfully and ethically, regardless of their location.

We believe in treating our customers, employees, investors and suppliers as we would like to be treated. We expect that our suppliers conduct business in a way consistent with the unique principles and values of our company.



# OCCUPATIONAL HEALTH AND SAFETY



At Worthington, we strive to provide workers a safe and healthy working environment that meets or exceeds applicable local laws and industry standards for occupational health and safety. We expect our suppliers to align with this approach, complying with all applicable laws and regulations governing health and safety at work.

Furthermore, suppliers should implement a health and safety management system to proactively apply measures that support injury prevention and minimize health risk exposures.

A photograph of two men on a construction site. The man on the left is gesturing with his hand while talking to the man on the right, who is wearing sunglasses. They are standing in front of a brick wall and scaffolding.

# LABOR AND HUMAN RIGHTS

Rooted in our Philosophy, Worthington expects all suppliers to respect and uphold the basic and fundamental rights of workers, local communities, and other relevant stakeholders, to prevent and address adverse human rights impacts linked to business activities, consistent with the UN Guiding Principles on Business and Human Rights. Suppliers should implement a management system for human rights and working conditions that incorporates the following:

***Child Labor and Minimum Work Age*** – Suppliers shall not use or tolerate any form of child labor within their organization or purchase materials or services from companies employing minors who do not meet the legal minimum working age of their country or region.

***Modern Slavery*** – Suppliers shall not use, nor tolerate, any form of forced, bonded or compulsory labor, involuntary servitude or slave labor, including human trafficking, within their organization or purchase materials or services from companies using forced, bonded or compulsory labor, involuntary servitude or slave labor, including human trafficking.

***Non-Discrimination and Harassment*** – Suppliers shall not tolerate any form of discrimination or harassment in respect of employment and occupation. Suppliers are expected to provide equal opportunities and fair treatment of all employees in hiring and employment practices.

***Freedom of Association and Collective Bargaining*** – Employees' rights to free association and collective bargaining shall be recognized and respected, as far as legally permitted.

# LABOR AND HUMAN RIGHTS

**Compensation and Working Hours** – Suppliers must comply with all applicable wage and hour laws, including those related to minimum wages, overtime pay, and legally mandated benefits. Compensation must be provided in a timely and transparent manner.

**Diversity, Equity, and Inclusion** – Worthington values diversity of all types and believes diverse thought and experiences help drive innovation and lead to long-term successes. Our suppliers should encourage diversity in all levels of their workforce and leadership, striving to promote inclusive cultures, ensuring employees and other stakeholders are always treated with dignity and respect.

**Ethical Recruiting** – Suppliers shall not mislead or defraud potential workers and contractors about the nature of employment or work, request recruiting payment fees or installments, nor confiscate, destroy, conceal, or deny access to government-issued identity documents and legally binding contractual agreements.

**Acceptable Living Conditions** – Suppliers that provide housing or accommodations for workers must ensure that those living spaces are safe, clean, and meet or exceed all applicable local housing standards. Facilities should provide adequate privacy, ventilation, lighting, sanitation, and access to clean drinking water.

**Corporal Punishment** – The use or threat of physical punishment or abuse in the workplace is strictly prohibited. Suppliers must treat all employees with respect and dignity and ensure that disciplinary procedures are fair, lawful, and free from any form of violence, coercion, or intimidation.

# ENVIRONMENTAL PROTECTION

Worthington is committed to minimizing environmental impact and promoting sustainability throughout its operations and supply chain. Suppliers are expected to share this commitment and operate responsibly, utilizing these best practices while striving for continual improvement.

**Carbon Management** – Track greenhouse gas (GHG) emissions in accordance with the Greenhouse Gas Protocol, set reduction targets, and monitor performance.

**Waste** – Prioritize waste reduction, reuse, and recycling, and manage any remaining waste responsibly in accordance with applicable laws and regulations.

**Air Quality** – Implement work practices and controls that reduce air pollution while increasing the use of renewable energy.

**Water** – Manage processes to minimize water consumption and treat wastewater to meet environmental standards before discharge.

**Chemical Management** – Suppliers are responsible for the safe management of chemicals, including eliminating substances of concern, providing material declarations and SDS for compliance verification.

**Biodiversity** – Assess operational impact on natural resources and implement protection strategies where appropriate.



# ETHICS IN BUSINESS

Guided by our Philosophy, we uphold the highest ethical standards in our business practices. We act with integrity and treat all business partners, customers, suppliers, and communities with dignity and respect.

**Anti-Corruption and Prohibition of Bribery** – Suppliers shall not tolerate corruption or bribery in any facet of business and shall ensure compliance with all anti-corruption laws, including but not limited to the Foreign Corrupt Practices Act.

**Confidentiality, Data Protection and Data Security** – Suppliers must protect the confidentiality, integrity, and availability of Worthington's information by implementing appropriate safeguards. Those handling personal data must comply with applicable privacy laws, including requirements for secure storage, lawful processing, and cross-border transfers. Suppliers must train relevant personnel on data protection and promptly report any actual or suspected data breaches involving Worthington's information.

**Grievance Mechanisms** - Suppliers are expected to maintain accessible, confidential, and non-retaliatory mechanisms that allow workers to raise concerns or grievances in their native language. These mechanisms should be clearly communicated to all workers and designed to support timely resolution of issues.

In addition to internal channels, Worthington's Ethics Line is available for reporting concerns related to our supply chain. Reports may be submitted anonymously, subject to local laws, through the following:

- Phone: 877-263-9893
- Desktop: [worthington.ethicspoint.com](http://worthington.ethicspoint.com)
- Mobile: [worthington-mobile.ethicspoint.com](http://worthington-mobile.ethicspoint.com)



# ETHICS IN BUSINESS

**Preventing Conflicts of Interest** – Suppliers must not make business decisions that will create situations that are, or appear to be, a conflict of interest. Any factors that might influence our suppliers' decision due to private, business, or other conflicts of interest must be prevented. Suppliers should disclose situations where personal, financial, or other interests conflict with business responsibilities.

**Antitrust/Unrestricted Competition** – Suppliers are expected to conduct business in a fair manner and comply with all applicable antitrust laws and regulations.

**Counterfeit Parts** – Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of introducing counterfeit or diverted parts and materials into deliverable products.

**Financial Responsibility and Accurate Records** - Suppliers are expected to accurately record, maintain, and report all business dealings in company financial reports and filings, in accordance with applicable laws and accepted accounting principles.

**Export Controls, Trade, and Economic Sanctions** – Suppliers are expected to establish appropriate policies and procedures ensuring compliance with all applicable export controls and economic sanctions laws, respecting restrictions on the export/import of goods and services involving restricted countries, regions, companies, entities, and individuals.

**Intellectual Property** – Suppliers are expected to implement reasonable practices to prevent the unauthorized transfer of confidential technology and know-how, and to respect intellectual property rights.



# RESPONSIBLE SUPPLY CHAIN MANAGEMENT

Suppliers play a critical role in upholding the standards and values outlined in this Code of Conduct. As part of their responsibilities, suppliers must ensure that these expectations are also extended throughout their supply chains. This includes subcontractors, labor brokers, and other sub-tier providers, all of whom are expected to fully comply with the principles set forth in this Code. Suppliers are accountable not only for their own practices, but also for promoting and enforcing ethical, legal, and responsible behavior across all tiers of their operations.

**Due Diligence** – Assess and address potential negative impacts in operations, supply chains, and business relationships using OECD (Organisation for Economic Co-operation and Development) Due Diligence Guidance for Responsible Business Conduct to ensure transparency and sustainability performance.

**Responsible Sourcing** – Source raw materials ethically, conduct annual conflict minerals assessments, document findings per OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, and provide documentation when requested.



# SUPPLIER COLLABORATION

As a valued supplier to Worthington, we ask for your support in aligning with the principles outlined in this Supplier Code of Conduct.

We expect all suppliers to understand our minimum expectations, review these principles against current management systems, policies, and guidelines, and take action where needed, cascading similar principles throughout their supply chain.



# COMPLIANCE MONITORING AND ENFORCEMENT

Worthington reserves the right to assess supplier compliance with this Code of Conduct through various means, including self-assessments, documentation reviews, and on-site visits, where appropriate.

We expect suppliers to cooperate in good faith with any compliance inquiries, promptly address identified concerns, and take corrective action as needed.

Failure to meet the expectations outlined in this Code may result in corrective measures, including potential reevaluation of the business relationship.

