



Kohler Supplier Code of Conduct

Kohler and its affiliates, divisions, and subsidiaries conduct business in accordance with the highest ethical standards, and in compliance with United Nations Guiding Principles and the laws of countries in which we produce, buy, and sell our products.

Suppliers are responsible for monitoring adherence to this Code of Conduct for themselves and their supply chains which is any third parties with whom they do business, including subcontractors. All suppliers must be able to demonstrate compliance with these requirements at the request of Kohler.

Suppliers shall take necessary corrective actions to promptly remediate any noncompliance, and will actively engage in any remediation, including timely preparation and presentation of a Corrective Action Preventative Action (CAPA) plan. Kohler reserves the right to terminate business at any time for non-compliance of this Supplier Code of Conduct.

Kohler Required Minimum Standards of Conduct:

- **Laws and Regulations:** Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate.
- **Supply Chain:** Any third-party participating in the manufacture of products or components, including subcontractors, must be compliant with this Supplier Code of Conduct or equivalent. Kohler reserves the right to request proof of supply chain compliance.
- **Data Protection:** Suppliers shall comply with all applicable laws and directives providing for the protection, transfer, access, and storage of personal information. This includes, but is not limited to, General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679).
- **Human Trafficking, Slavery, and Forced Labor:** All forms of human trafficking, slavery, forced, convict, bonded (including debt bondage), or indentured labor of any kind are forbidden, including physical abuse and corporal punishment. This includes, but is not limited to, transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. This also includes, but is not limited to, compliance with Countering America's Adversaries through Sanctions Act, California Transparency in Supply Chains Act of 2010, and UK Modern Slavery Act.

There shall be no unreasonable restrictions on workers' freedom of movement in the facility or upon entering or exiting company-provided facilities.

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As part of the hiring process, and prior to the worker departing from his or her country of origin, workers must be provided with all documents relevant to their employment in a language they understand with a description of terms and conditions of employment, and there shall be no substitution or changes allowed in such documentation upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms.

All work must be voluntary, and workers shall be free to terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate, or deny access by workers to their identity or immigration documents, such as government-issued identification, passports or work permits, unless such holdings are required by law.

Foreign migrant factory workers shall not be required to pay employers' or agents' recruitment fees or other related fees for the purpose of being hired or as a condition of employment.

- **Child Labor:** All workers must be at least the local legal age, above the oldest compulsory school age, and in no case less than 15 years old. Suppliers must also comply with all local legal requirements for the work of authorized young workers, particularly those pertaining to hours of work, wages, and working conditions.
- **Health and Safety:** Suppliers must provide a safe and healthy working environment in accordance with applicable laws and regulations. At a minimum, workers must have access to first-aid, fire exits, safety equipment, potable water, clean, operational toilet facilities, and eating facilities. If residential facilities are provided, they must be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, heat and ventilation, and water for bathing and showering.
- **Work Hours:** Except in extraordinary business circumstances, workers shall not work more than the lesser of (a) sixty (60) hours per week, including overtime or (b) the limits on regular and overtime hours allowed by applicable law. In addition, all workers shall be entitled to at least one day off in every consecutive seven-day period.
- **Wages and Benefits:** Wages must be set at or above local minimum wage and compensation requirements (including overtime), as defined by applicable labor laws, applicable agreements and local regulations for regular work, overtime work, production rates and other elements of compensation and employee benefits.
- **Non-Discrimination:** Employment (hiring, salary, benefits, promotion, training, discipline, termination, retirement, or any other terms and conditions of employment) must be based on merit and ability to perform the job requirements, not on traits such as race, religion, ethnicity, sexual identity or orientation, age, or sex.

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- **Whistleblower Protection:** Suppliers shall ensure the protection of whistleblower confidentiality and prohibit retaliation against workers who come forward in good faith and/or refuse an order that is in violation of this Code of Conduct. Workers must have an anonymous complaint mechanism to report workplace grievances and Code of Conduct violations in accordance with local laws and regulations.
- **Freedom of Association and Collective Bargaining:** Suppliers shall recognize and respect the rights of workers to exercise lawful rights of free association, including joining or not joining any association. Suppliers must also respect the legal right of workers to bargain collectively.
- **Harassment or Abuse:** Every worker shall be treated with respect and dignity. No worker shall be subject to any physical, sexual, psychological or verbal harassment or abuse. In addition, suppliers will not use monetary fines as a disciplinary practice.
- **Communication:** Suppliers must communicate to all workers and supervisors the protections and benefits afforded to them by applicable law and this Code.
- **Monitoring and Compliance:** Kohler may undertake affirmative measures, such as announced and unannounced on-site audits of production factories, to monitor compliance with this Code of Conduct. Suppliers must maintain on-site all documentation necessary to demonstrate compliance, and allow Kohler representatives full access to production facilities, worker records, production records, and workers for confidential interviews in connection with such visits. Suppliers will not improperly impact the results of any audit including presentation of falsified records or coaching of workers.
- **Environment and Sustainability:** Suppliers shall comply with all applicable environmental laws and regulations. Suppliers shall strive for continuous improvement in their operations and procurement practices to reduce environmental impacts throughout the product life cycle, such as reducing their carbon and water footprint and improving resource utilization. Suppliers shall provide any requested data to help Kohler achieve environmental and material transparency for its products. This data may include, but is not limited to, full material disclosures, production resource information (energy, water, material, chemicals, waste etc.), final points of assembly, and transportation modes and distances.
- **Restricted Materials List:** Suppliers will comply with all applicable product environmental laws including those regulating toxic materials, air emissions, wastewater discharge, waste treatment and disposal. No products are to be designed, developed, manufactured or sold without adherence to applicable product composition regulations in effect and Kohler’s Product Environmental Policy - Restricted Materials List which can be found at <http://www.kohlercompany.com/suppliers/conducting-business/>. Upon request from Kohler Co., suppliers must provide required supporting documentation for applicable materials.
- **Responsible Sourcing of Minerals:** Suppliers must comply with applicable laws and regulations regarding conflict minerals which currently include tin, tungsten, tantalum, gold, and cobalt. Any conflict minerals contained in supplier products must not directly or indirectly perpetuate human rights abuses. Suppliers must exercise due diligence on the source and chain of custody of these minerals and require the same from their supply chain.

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- **Ethics:** Suppliers will conduct business with honesty and integrity and demonstrate the highest standards of ethical behavior.
- **Gifts, Entertainment and Conflict of Interest:** Gifts, meals, entertainment, hospitality, and trips that lack a legitimate purpose may be viewed as bribes, create the appearance of a conflict of interest, and/or be perceived as an attempt to improperly influence decision making. It is the firm policy of Kohler that gifts or gratuities shall not be offered or sent to any Kohler associate. Offers of generally distributed promotional items which clearly display a corporate logo/advertising are allowed on an infrequent basis.
- **Anti-Bribery:** Suppliers shall not make or receive any corrupt or inappropriate payment on behalf of itself, any third-party, or Kohler and shall comply with all applicable laws, statutes, directives and/or regulations relating to anti-bribery and anti-corruption, including but not limited to the US Foreign Corrupt Practices Act, the UK Bribery Act, and other applicable laws.

In addition to their remediation obligations, Suppliers must promptly inform Kohler when any situation develops that causes the Supplier to operate in violation of this Code of Conduct.

A current copy of the Supplier Code of Conduct is available at this site and should be consulted regularly for updates: <https://www.kohlercompany.com/suppliers/conducting-business/>.

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