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# INTRODUCTION

At Ajax Building Company, we take pride in the lasting and trusting relationships we build with our clients. To preserve that trust, we count on our network of valued suppliers, subcontractors, and other business partners to uphold our values, standards, and principles. This Supplier Code of Conduct (“Supplier Code” or “Policy”) sets out the minimum standards of conduct expected of third parties doing business with Ajax Building Company (“Ajax”).

Ajax is part of the STO Building Group (“STOBG”) family of builders and aligns its expectations for third parties with STOBG’s group-wide standards. As a result, certain policies and resources referenced in this Supplier Code are STOBG policies that are developed, maintained, and applied across the broader STOBG organization.

We are committed to working with our business partners to help them meet their obligations under this Policy—as well as the expectations of our clients, communities, and other stakeholders. We can achieve success on every project through great teamwork, all while maintaining our motto in focus: “Quality builds its own reputation.”

## Scope

This Supplier Code applies to all third parties that provide goods or services to Ajax, including suppliers, subcontractors, service providers, consultants, intermediaries, agents and other business partners (collectively, “Suppliers”).

This Supplier Code is a companion to our other policies, including our:

- [Code of Conduct](#)
- [Anti-Corruption Policy](#)
- [Gifts and Entertainment Policy](#)
- [Non-Discrimination and Anti-Harassment Policy](#)
- [Anti-Slavery and Human Trafficking Policy](#)
- [Human Rights Policy](#)

- [Environmental Policy](#)
- [Generative Artificial Intelligence \(AI\) Policy](#)

These policies are available on [our website](#) at [ajaxbuilding.com/compliance](#). Suppliers are expected to understand and uphold the relevant provisions of these policies when conducting business with Ajax and to operate in a manner consistent with the standards we apply to our own employees.

## Management of This Supplier Code

This Supplier Code has been approved by Ajax's executive management. Our Compliance & Ethics Department is responsible for managing this Policy and periodically reviews it to determine whether updates are needed to reflect changes in the law, business operations, or internal policies. The most current version of the Supplier Code can be found on [our website](#).

## BASIC SUPPLIER RESPONSIBILITIES

### Comply With This Policy

Ajax requires all Suppliers to comply with this Supplier Code. By accepting a contract or purchase order from Ajax, a Supplier agrees to follow the standards in this Policy. For Suppliers whose contracts with Ajax expressly incorporate this Code, compliance with the Supplier Code is also a contractual obligation.

Suppliers must ensure that their workforce understands the standards set out in this Supplier Code and what is expected of them when working with Ajax. Suppliers must also require their own subcontractors, suppliers, and other third parties engaged to perform work for Ajax to comply with this Policy. This includes doing proper due diligence and including terms in their contracts to make the

standards of this Policy binding throughout their supply chain. Suppliers may be held responsible for misconduct by any lower-tier supplier working for them on an Ajax contract.

## Comply With the Law

Suppliers must operate in full compliance with the letter and spirit of all applicable laws and regulations, whether local, state, or federal. Custom or local practice must never take precedence over legal requirements.

Where applicable laws conflict with the standards in this Supplier Code, Suppliers are expected to follow the higher legal or ethical standard. They are also expected to uphold the highest standards of honesty, integrity, and fairness, and conduct their business in a socially responsible manner.

## Speak Up

Suppliers must promptly report any potential violations of this Policy or the law. Ajax also expects Suppliers to report any conduct by an Ajax employee that does not align with our [Code of Conduct](#).

Reports should be made to your Ajax representative or directly to our Compliance & Ethics Department at [Compliance@STOBG.com](mailto:Compliance@STOBG.com). You may also report concerns through our 24/7 helpline, operated by an independent third party unaffiliated with Ajax, by calling toll-free at 800.461.9330 or visiting the website at [compliancehelpcenter.com](http://compliancehelpcenter.com).

Reports to the helpline can be made anonymously. Any reports made, whether anonymous or not, should include as much detail as possible to allow the company to investigate the matter appropriately. Ajax will investigate all reports promptly, thoroughly, and in line with applicable law. Suppliers may be asked to participate in an investigation, and full cooperation is expected. Investigations and the identities of those involved will be kept confidential to the extent possible. The

company will take appropriate action based on the findings.

## Prohibit Retaliation

Suppliers must not retaliate, or permit retaliation, against anyone who, in good faith, reports potential misconduct, raises a concern, seeks guidance, or cooperates in an investigation. "Good faith" does not mean you have absolute proof or that the conduct reported has to be substantiated; rather, it means you have a reasonable basis to believe your report may be true and requires further investigation. Suppliers must also foster a workplace environment where employees feel safe speaking up. A formal process should be in place to allow employees to report concerns without fear of retaliation. Where permitted by law, anonymous reporting should also be available.

## Cooperate in Due Diligence, Audits, Investigations, and Reviews

Ajax reserves the right to conduct onboarding due diligence on any Supplier before initiating a business relationship. Ajax may also perform ongoing due diligence, monitoring, or audits at any time during the relationship to assess a Supplier's compliance with this Supplier Code. Suppliers are expected to cooperate in good faith with any due diligence, audit, investigation, or review by Ajax. This includes providing requested records, making employees and representatives available for interviews, and granting access to facilities for inspection.

Suppliers must also evaluate and monitor their own supply chain to ensure compliance with this Policy and, upon request by Ajax, conduct audits of their suppliers to verify adherence. Any non-compliance must be promptly disclosed to Ajax and addressed in a timely and effective manner, at no cost to Ajax or its clients.

In addition, to the extent permitted by law, Suppliers must promptly forward to Ajax any subpoenas, regulatory requests, media inquiries, or other third-party communications concerning Ajax.

Ajax will consider compliance with this Supplier Code when making procurement decisions. Violations of the Supplier Code or applicable law may be deemed a breach of contract and result in immediate termination of the business relationship. Ajax also reserves the right to refuse to do business with non-compliant Suppliers in the future and may pursue any other remedies available under contract or law.

## RESPONSIBILITIES IN THE WORKPLACE

### Respect Human Rights

Suppliers must comply with all applicable labor laws and respect all internationally recognized human rights wherever they operate. We also expect Suppliers to uphold the principles outlined in our [Human Rights Policy](#). As part of these responsibilities, Suppliers must:

#### Prohibit Child Labor

Suppliers must comply with all applicable child labor laws and take steps to prevent child labor in their operations and supply chain. Suppliers may only employ workers who meet the minimum legal age requirement in the jurisdiction where the work is performed, and under no circumstances may they employ individuals younger than the age required to complete compulsory education.

Suppliers must not permit children to perform work that interferes with their schooling or vocational education or that exposes them to risks that can harm their physical, mental, or emotional development. Suppliers must notify Ajax immediately upon discovering or suspecting any

instance of child labor in their operations or supply chain.

#### Prohibit Modern Slavery and Human Trafficking

This includes any form of slavery or forced, bonded, indentured, or involuntary prison labor. Human trafficking involves the recruitment, transportation, harboring, transfer, or receipt of people by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Suppliers must ensure that all workers are employed voluntarily and not under threat, coercion, or force of any kind. Workers must be provided clear, accurate, and understandable information about the basic terms of their employment before beginning work. Suppliers may not allow any practice that would restrict free movement of workers, such as requiring employees to surrender any personal identification or travel or immigration documents as a condition of employment. In addition, Suppliers must not use fraudulent or misleading recruitment practices or require workers to pay fees or deposits to secure or maintain their employment.

Suppliers must notify Ajax immediately upon discovering or suspecting any instance of modern slavery or human trafficking in their business or supply chain.

For more information, please consult our [Anti-Slavery and Human Trafficking Policy](#).

#### Ensure Fair Wages, Hours, and Benefits

Workers must be paid at least the minimum legal wage, or a wage that meets local industry standards, whichever is higher, and be provided with breaks, time off, and sick leave as required by law. Suppliers must also contribute to all required social security and welfare programs, including medical and injury insurance.

## Prohibit Discrimination and Harassment

Ajax is an equal opportunity employer and complies with all applicable non-discrimination and anti-harassment laws. Our Suppliers must do the same. We expect Suppliers to have controls in place to prevent discrimination and harassment within their own operations and to abide by our [Non-Discrimination and Anti-Harassment Policy](#).

Suppliers must base employment decisions—such as hiring, promotion, and discipline—on legitimate job-related criteria. They may not discriminate in any aspect of the employment relationship based on an individual's race, color, religion, sex, national or ethnic origin, age, marital or family status, disability, genetic information, or any other characteristic protected under applicable federal, state, or local law.

Suppliers must treat their workers—and anyone they interact with in the course of performing work for Ajax, including Ajax employees, clients, subcontractors, and other personnel—with respect and professionalism. They may not engage in or permit any form of harassment, including corporal punishment; physical, sexual, psychological, verbal, or visual harassment; threats of violence; or other conduct of any kind that creates an intimidating, offensive, or hostile work environment.

## Respect Freedom of Association

When permitted by law, Suppliers must respect the rights of workers to organize, join associations of their choice, bargain collectively, or refrain from doing so, without fear of discrimination, retaliation, harassment, or intimidation.



For more information on our expectations of Suppliers in supporting and respecting human rights and fair employment practices, please consult our [Code of Conduct](#), [Human Rights Policy](#), and [Non-Discrimination and Anti-Harassment Policy](#).

## Provide a Safe and Healthy Work Environment

The health and safety of everyone involved in our projects is our highest priority. Suppliers must provide a clean, safe, and healthy workplace that supports accident prevention, minimizes exposure to health risks, and complies with all applicable safety laws and regulations, including the U.S. Occupational Safety and Health Administration's Safety and Health Regulations for Construction (29 CFR 1926). Suppliers must also comply with the most current version of any applicable Ajax safety manuals, as well as any site-specific safety or loss prevention programs. Suppliers are expected to fully cooperate with Ajax, the project owner, and any insurance carriers or loss prevention engineers to ensure a safe and compliant jobsite.

Suppliers must also maintain a system for workers to report health and safety incidents and for investigating and tracking those incidents. They must take corrective action to address reported incidents and prevent them from happening again.

A safe and healthy workplace must also be free of drugs and alcohol. Working under the influence of any substance that could impair one's judgment or performance is prohibited in all Ajax workplaces, including jobsites and offices, and while working on behalf of Ajax, including during breaks and mealtimes. The possession, sale, use, or distribution of drugs or alcohol on the job is also prohibited. This includes the misuse of prescription medications, over-the-counter drugs, or any other legal substances that may impair safe work performance.

Suppliers must also ensure that their workers do not engage in violent or threatening behavior. Weapons of any kind are prohibited on all Ajax jobsites and other workplaces. Suppliers must promptly report to Ajax any threats, acts of violence, or unsafe conduct observed in an Ajax workplace.

## Manage Labor and Subcontractors Responsibly

Suppliers are responsible for ensuring that all workers involved in their work for Ajax are authorized to work in the country where the work is performed, are properly classified, and are treated in accordance with applicable labor, employment, and immigration laws.

Suppliers must also ensure that any lower-tier subcontractors, suppliers, or labor providers they engage comply with the standards set forth in this Supplier Code. Such parties may not be used to avoid compliance with legal or contractual obligations, and Suppliers remain accountable for the conduct of all lower-tier entities working on their behalf.

Suppliers must conduct appropriate due diligence before engaging subcontractors or labor providers and must monitor their performance to confirm ongoing compliance. This includes verifying qualifications, licenses, and legal work authorization, and taking reasonable steps, consistent with applicable law, to assess and manage potential legal, safety, or reputational risks associated with assigned personnel.

## RESPONSIBILITIES IN THE MARKETPLACE

### Don't Engage in Corrupt Activity

Our [Anti-Corruption Policy](#) reinforces our commitment to acting honestly and ethically in all of our business dealings and to complying with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and the U.S. Foreign Extortion Prevention Act (FEPA). We prohibit all forms of corruption—including bribery, kickbacks, facilitation payments, other improper or corrupt payments, and any other attempt to gain a personal benefit or business advantage through improper or illegal means.

Suppliers must share our zero-tolerance approach to corruption and comply with all applicable anti-corruption laws. Suppliers must not engage in behavior that is, or may be perceived to be, corrupt, and must establish appropriate, risk-based anti-corruption controls, including those addressing the following:

### Bribery, Kickbacks, and Improper Payments

Suppliers must not offer, promise, give, request, demand, or accept any form of bribe, kickback, or improper payment—directly or indirectly—under any circumstance, even if permitted or condoned by local law or custom. While bribery is often associated with government officials (also referred to as public officials or public servants), this prohibition applies equally to “commercial bribery” involving private sector individuals.

Bribery includes promising, offering, authorizing, or giving anything of value—directly or indirectly—to a third party or someone closely connected to them, such as a family member, romantic partner, or personal associate, to improperly influence a business decision or secure an unfair advantage.

“Anything of value” has a broad meaning and includes cash, gifts, travel, hospitality, services, goods, discounts, loans, favors, business opportunities, political or charitable contributions, or any other direct or indirect benefit.

Both giving and receiving bribes are prohibited. A corrupt act is committed even if the bribe is not paid or the intended outcome is not realized. While a bribe is intended to influence future action, a kickback is a form of bribery where a payment or reward is made after a particular action has been taken.

### Failing to Prevent Bribery

Some anti-corruption laws prohibit not only corrupt acts, but also failing to prevent them. The UK Bribery Act 2010, for instance, makes it a crime for

a company to fail to prevent bribery when an “associated person”—someone performing services for or on behalf of the company, such as an employee, agent, or consultant—commits bribery for company’s benefit.

Suppliers are expected to implement and maintain adequate, risk-based procedures and controls to prevent bribery and other corrupt conduct. These controls should be tailored to the nature and geography of the Supplier’s operations and reviewed regularly for effectiveness.

### Facilitation Payments

Suppliers must not make facilitation payments (also called “grease payments” or “expediting payments”), even if permitted by local law or custom. These are typically small, unofficial payments made to government officials to facilitate or speed up routine governmental actions, such as issuing permits or clearing paperwork. Such payments are strictly prohibited and are not acceptable business expenses under Ajax policy.

### Money Laundering

Money laundering is the process of using otherwise legal businesses or transactions to conceal the origins of criminal proceeds. Suppliers must comply with all anti-money laundering laws. They should only work with third parties involved in legitimate business activities and whose funds come from lawful sources. Suppliers should be alert to “red flags,” such as requests for cash payments or other unusual payment terms.

### Compete Fairly

We believe that business success should be based on factors such as merit, quality, and price—not unethical practices. Suppliers are expected to compete honestly, fairly, and in full compliance with applicable competition laws. Suppliers must avoid any practice that discourages fair

competition or creates an unlawful competitive advantage, including:

- Entering into agreements (formal or informal) to fix prices
- Engaging in bid rigging or collusion (e.g., coordinating bids to ensure a specific company wins)
- Improper coordination that provides unfair access to confidential or non-public information during bidding
- Dividing markets, customers, or territories (e.g., agreeing not to compete in certain regions or with certain customers)
- Boycotting clients or suppliers (e.g., agreeing with others to avoid doing business with a certain company)
- Blocking or restricting competitors from entering the market (e.g., using unfair tactics to keep new businesses out)



For more information on our expectations of Suppliers in preventing bribery, corruption, and anticompetitive practices, please consult our [Anti-Corruption Policy](#).

### Avoid Conflicts of Interest

Our employees must act in the company’s best interest and avoid conflicts of interest, or disclose them when they cannot be avoided, in accordance with our conflicts of interest policy. This includes conflicts that are actual (existing), potential (a situation that may result in a conflict), and perceived (a situation that may appear to be a conflict, even if none exists).

A conflict of interest arises when personal interests, relationships, or activities interfere with, or appear to interfere with, the ability to make objective, impartial decisions in the best interest of Ajax. For

example, a conflict may exist if an Ajax employee participates in selecting or managing a Supplier that employs their relative.

Suppliers are held to the same standard. They should not have any relationship or engage in any activity—financial, personal, or otherwise—that conflicts with, could potentially conflict with, or appears to conflict with their obligations to Ajax. This includes personal relationships with Ajax employees that could compromise, or appear to compromise, the judgment or objectivity of Ajax personnel in relation to the Supplier.

Any actual, potential, or perceived conflict must be promptly disclosed to your Ajax representative. If you have any questions about conflicts of interest, you can email [Conflicts@STOBG.com](mailto:Conflicts@STOBG.com).

## Abide by Our Policy on Gifts and Entertainment

We select Suppliers based on the value they bring to our projects—not on any gifts or entertainment they may offer. Ajax prohibits the giving or receiving of gifts, entertainment, or other items of value that could influence, or appear to influence, business decisions made by our employees, clients, or partners.

This includes offering or performing free or discounted goods and services—such as home repairs, renovations, or materials—for an Ajax employee's personal use. These are considered gifts and are not appropriate under our policy.

We ask our Suppliers to follow these simple rules:

- Do not offer gifts, entertainment, or other business courtesies intended to influence decisions or gain favorable treatment.
- Never offer cash, gift cards, or anything of cash value to any Ajax employee.
- Do not offer or provide free or discounted goods or services for any employee's

personal benefit, including work at a personal residence.

- Keep any business courtesies modest, occasional, and appropriate to the professional relationship.
- Do not feel obligated to give gifts or entertainment. Ajax employees should not request or solicit gifts or entertainment from Suppliers.
- Do not offer gifts or entertainment to third parties (such as clients, union representatives, or government officials) on Ajax's behalf unless permitted by Ajax policy.

For more information, please consult our [Gifts & Entertainment Policy](#). If you're ever unsure about whether a gift or entertainment is appropriate, check with your Ajax representative.

## Follow Our Supplier Engagement Policy

Ajax's Supplier Equal Engagement Policy, available through a Supplier's Ajax representative, reflects our commitment to fair and open access to project opportunities and to meeting government or client procurement objectives. This includes engaging qualified businesses that are small, local, or otherwise designated consistent with such objectives, consistent with applicable law.

We maintain a broad network of qualified suppliers and are committed to identifying opportunities that promote fair and equal access to project engagements. Suppliers must comply with all contractual and regulatory requirements relevant to their participation. If a Supplier represents that it holds a certification applicable to a project, it must provide supporting documentation and promptly update Ajax if its status changes.

Suppliers engaged pursuant to government or client procurement objectives based on their certification may not subcontract or transfer their scope of work without prior written authorization

from Ajax. Such Suppliers must perform commercially useful functions as part of their contract. Misrepresenting the source of goods or services may constitute fraud and result in the termination of the business relationship.

## **Know the Rules That Apply to Government Work**

When Ajax performs work funded by or on behalf of government entities—whether federal, state, or local—both the company and its Suppliers must follow additional laws, regulations, and contract requirements. These obligations are often more complex and stringent than those that apply to private sector work, and violations can result in serious legal, financial, and reputational consequences.

Suppliers working on government-funded projects must fully comply with all applicable requirements. These may include rules related to procurement integrity, labor and wage standards, nondiscrimination, certifications, recordkeeping, and billing practices. Suppliers may also be subject to audits, reporting obligations, or restrictions on interactions with government officials.

## **Follow All Trade Control and Sanctions Laws**

Suppliers must comply with all applicable trade laws and regulations in connection with their work for Ajax. This includes export control laws, economic sanctions, customs regulations, tariffs, and anti-boycott laws. Suppliers are responsible for understanding how these rules apply to their products and services when working with Ajax across jurisdictions.

## **Don't Use Nonpublic Information for Insider Trading**

Suppliers must not use any material, nonpublic information obtained through their work with Ajax

to buy or sell securities or to advise others to do so. This applies to confidential information about Ajax, our clients, or business partners. Suppliers must maintain the confidentiality of all such information and may only share it with authorized individuals who have a legitimate business need to know. Engaging in insider trading or misusing confidential information may violate securities laws and result in serious legal consequences.

# **RESPONSIBILITIES WITHIN YOUR ORGANIZATION**

## **Keep Accurate Records**

Suppliers must maintain accurate, complete, and timely records related to their work with Ajax. This includes complying with legal and contractual requirements, applicable accounting standards, and good recordkeeping practices. Examples of required records may include bid documentation, purchase orders, change orders, invoices, timesheets, pay records, health and safety logs, injury reports, residence and work permits, employment contracts, and proof of age documentation. Suppliers must never falsify records, attempt to conceal transactions, or otherwise fail to properly document their work.

## **Maintain Effective Internal Controls**

Suppliers must have appropriate internal controls in place to ensure compliance with applicable laws, contract requirements, and this Supplier Code. These controls should support sound practices in areas such as financial reporting, labor management, health and safety, and procurement. Depending on the scope of the Supplier's work, this may include written policies, regular internal reviews, and processes to identify and manage key risks—such as unauthorized payments, inaccurate invoices, or misused project resources. Controls should be tested periodically to ensure they are working properly and updated when new risks arise.

## Protect Ajax Property

Suppliers must take reasonable steps to protect all property entrusted to them by Ajax, including equipment, tools, technology, and confidential information. This also includes property belonging to our clients, business partners, and others involved in the project. Ajax property must only be used for legitimate business purposes and in accordance with legal, contractual, and project-specific requirements. Suppliers must safeguard this property using appropriate physical and electronic security measures and must not use it for personal benefit or share it without authorization.

## Manage Data Appropriately

Suppliers must comply with all applicable data protection, privacy and security laws, as well as any contractual obligations related to handling information received from Ajax. This includes properly managing any confidential business information or personal identifying information connected to a project.

Confidential or personal information may include, for example, employee or worker contact details, health and safety records, timekeeping or payroll data, project bids or estimates, and internal communications related to Ajax or its clients. Suppliers should treat all such information as confidential unless explicitly authorized otherwise.

Suppliers must have appropriate measures in place to protect the confidentiality, integrity, and availability of this information. They must access or share confidential or personal identifying information only when authorized and only for legitimate business purposes. Such information should never be discussed in public or unsecured settings, or communicated through text messages, personal email accounts, or non-Ajax-approved messaging applications. When on jobsites, be aware of your surroundings and only discuss confidential information in secured work areas.

If a suspected or actual data breach occurs, Suppliers must notify their Ajax representative immediately. Suppliers are also expected to cooperate with Ajax on all matters related to data protection, privacy, and security.

## Use Artificial Intelligence Responsibly

We recognize that Artificial Intelligence (AI) can enhance efficiency and productivity, and we support its thoughtful use. However, it must be used responsibly, ethically, and in compliance with all applicable laws and regulations, project and safety standards, and our [Generative Artificial Intelligence \(AI\) Policy](#).

Suppliers must protect confidential client and Ajax information and may not use such information in public or generative AI tools without our express written consent. Suppliers are expected to follow the same safeguards outlined in our [Generative AI Policy](#), including protecting sensitive data, ensuring quality control of outputs, and complying with client AI requirements.

Any work product generated with the help of AI must be reviewed and approved by a qualified person before it is submitted to Ajax. AI must not replace human judgment—especially in technical or safety-sensitive areas. Suppliers remain fully accountable for the quality, accuracy, and compliance of any work product, regardless of whether AI tools were used.

In addition, if Ajax is required to respond to a legal or regulatory request related to a Supplier's use of AI, the Supplier is expected to cooperate and provide relevant information in a timely and complete manner.

# RESPONSIBILITIES IN THE COMMUNITY

## Minimize Impact on the Environment and Human Health

Suppliers must conduct their operations in a manner that respects human health and is environmentally responsible and climate conscious. We expect our Suppliers to uphold the principles set out in our [Environmental Policy](#) and to adopt similar environmental standards within their own businesses.

Suppliers must maintain all required environmental permits and registrations and comply with all applicable environmental laws, including those related to waste disposal, hazardous waste, toxic substances, and the legal procurement of materials, including timber and ozone-depleting substances. Suppliers should take steps to minimize any detrimental environmental or human health effects resulting from their activities, products, and services. Suppliers must also comply with any project-specific environmental or sustainability requirements, and are expected to align their operations with relevant sustainability practices and guidelines.

Material end-of-life considerations should include reusability, recyclability, and/or compostability. Where available, Suppliers must provide access to manufacturers' "take-back" programs. Suppliers are also encouraged to choose less toxic alternatives for open-spec items when available, especially those that may involve the release of persistent, bio-accumulative, and toxic (PBT) chemicals, carcinogens, or reproductive and developmental toxins.

## Communicate Responsibly

Suppliers may not speak publicly on behalf of Ajax without express written authorization from our executive management or Corporate Marketing

team. This includes speaking to the media, participating in interviews or public forums, or posting content that could be interpreted as representing Ajax.

All media, legal, regulatory, financial, or governmental inquiries must be immediately referred to the Supplier's Ajax representative, who will coordinate with the appropriate Ajax teams.

Suppliers may not photograph or otherwise record anything related to an Ajax project without prior written approval from the Ajax representative overseeing the project. They may not post any images, updates, or references to Ajax projects, clients, or jobsite conditions on social media or other public platforms without prior written approval from both their Ajax representative and Ajax's Marketing Department.

All Supplier communications must respect Ajax's confidentiality obligations and privacy expectations. Suppliers should also not post content that could imply endorsement or representation by Ajax. When in doubt, Suppliers should consult their Ajax representative before posting or sharing content related to Ajax.

## STAYING ALIGNED

Ajax is proud to work with Suppliers who share our commitment to integrity, professionalism, and responsible business practices. Your partnership is essential to how we deliver exceptional outcomes.

If you have questions about this Supplier Code or any of the expectations it outlines, please contact your Ajax representative or our Compliance & Ethics Department at [Compliance@STOBG.com](mailto:Compliance@STOBG.com).

Thank you for helping us build the extraordinary—together.



Ajax