

SWEP

A DOVER COMPANY



SWEP Supplier Code of Conduct

Introduction

SWEP is a world-leading supplier of brazed plate heat exchangers and part of the Dover Corporation group. As a manufacturing company operating in multiple regions, we rely on responsible and resilient supply chains to deliver high-quality products to our customers.

SWEP is committed to conducting business with integrity, transparency, and respect for human rights and the environment. These principles apply not only to our own operations, but also to our suppliers and business partners. As a Dover company, SWEP suppliers are required to comply with the Dover Supplier Code of Conduct. This SWEP Supplier Code of Conduct complements the Dover Supplier Code by highlighting key expectations particularly relevant to SWEP's operations, manufacturing footprint, and sustainability commitments.

This Code applies to all suppliers providing goods or services to SWEP, including their employees, contractors, agents, and sub-tier suppliers involved in the production or delivery of products and services to SWEP.

SWEP may conduct risk-based due diligence and assessments of suppliers prior to and during the business relationship to evaluate compliance with this Code and applicable laws.

Suppliers are expected to read, understand, and comply with both:

- The Dover Supplier Code of Conduct (Exhibit A)
- This SWEP Supplier Code of Conduct

In the event of inconsistency, the stricter requirement shall apply.



1. Compliance and Business Integrity

Suppliers must comply with all applicable laws and regulations in the countries where they operate.

Suppliers are expected to:

- Conduct business ethically and with integrity
- Prohibit bribery, corruption, extortion, and fraud
- Avoid conflicts of interest
- Comply with international trade regulations and sanctions
- Maintain accurate books and records
- Cooperate with reasonable audits and information requests

SWEP relies on Dover's detailed framework for anti-corruption, competition law, trade compliance, data protection, and related governance areas.

2. Human Rights and Labor Standards

SWEP expects suppliers to respect internationally recognized human rights standards, including the UN Guiding Principles on Business and Human Rights and the ILO Core Conventions.

Suppliers shall:

A. Non-Discrimination

Provide equal treatment and prohibit discrimination based on race, gender, age, religion, disability, sexual orientation, nationality, union affiliation, or other protected characteristics.

B. Forced Labor

Prohibit all forms of forced, bonded, trafficked, or involuntary labor. Employment must be voluntary.

C. Child Labor

Prohibit child labor. No person under the legal minimum working age shall be employed. Hazardous work shall not be performed by anyone under 18.

D. Working Hours and Wages

Comply with applicable laws on working hours, rest periods, and overtime. Wages shall meet or exceed legal minimum requirements.

E. Freedom of Association

Respect workers' rights to freedom of association and collective bargaining in accordance with applicable law.

F. Workplace Safety

Provide a safe and healthy working environment and comply with applicable occupational health and safety regulations.



3. Environmental Responsibility

SWEP expects suppliers to operate in an environmentally responsible manner and to actively manage and reduce environmental impacts associated with their operations and supply chains.

Suppliers shall:

A. Environmental Compliance

Comply with all applicable environmental laws, regulations, and industry standards in the countries where they operate.

B. Environmental Management

Implement appropriate processes to identify, manage, and mitigate environmental risks and impacts related to their operations, including pollution prevention and responsible handling of waste and emissions.

C. Emissions and Energy Management

Monitor and manage energy use and greenhouse gas emissions where relevant. Suppliers are encouraged to improve energy efficiency, transition to lower-carbon energy sources where feasible, and reduce emissions over time.

D. Resource Efficiency

Promote efficient use of raw materials, water, and energy. Suppliers should seek to minimize waste generation and support circular material flows where feasible.

E. Chemicals and Hazardous Materials

Handle, store, transport, and dispose of chemicals and hazardous substances in accordance with applicable laws and recognized safety standards.

F. Environmental Data and Transparency

Provide relevant environmental and sustainability-related information upon request, including data related to greenhouse gas emissions (Scope 1, 2, and where relevant Scope 3), energy use, material composition, product carbon footprint, and other indicators necessary to support SWEP's sustainability reporting, regulatory compliance, customer requirements, and due diligence obligations.

Suppliers are encouraged to set measurable environmental improvement objectives where material to their operations and are expected to pursue continuous improvement in environmental and sustainability performance over time.



4. Supply Chain Risk Management

Suppliers are expected to implement appropriate processes to identify and manage risks related to:

- Human rights
- Labor conditions
- Ethical business practices
- Environmental impacts
- Sub-tier suppliers

Upon request, suppliers shall provide documentation of relevant policies, risk assessments, or mitigation measures.

Suppliers are expected to cascade relevant requirements to their own suppliers and subcontractors where appropriate.

5. Implementation and Monitoring

Suppliers shall:

- Implement internal processes to ensure compliance with this Code
- Maintain documentation demonstrating compliance
- Cooperate with reasonable audit or assessment activities
- Promptly address identified non-conformities
- Raise concerns regarding potential violations of this Code or applicable laws through appropriate channels, including Dover's ethics and compliance reporting mechanisms where relevant

SWEP reserves the right to conduct audits, assessments, or inspections of supplier facilities, documentation, and relevant operations to verify compliance with this Code, subject to applicable laws and contractual agreements. Failure to comply with this Code, including refusal to cooperate with audit activities, may result in corrective actions or review of the business relationship.



Supplier Acknowledgement

The undersigned acknowledges that it has received and reviewed the SWEP Supplier Code of Conduct and the Dover Supplier Code of Conduct (Exhibit A).

The supplier confirms that it understands the expectations set forth in these Codes and commits to comply with their requirements in connection with the business relationship with SWEP.

The supplier further commits to communicate the relevant requirements of these Codes to its employees, contractors, agents, and sub-tier suppliers involved in the production or delivery of goods and services to SWEP.

Failure to comply with these requirements may result in corrective actions or review of the business relationship.

Supplier Name

Authorized Representative

Title

Signature

Date