

Forced Labor Policy

Effective Date: January 1, 2025

Revised Date: January 1, 2025

Overview

Bohn and Dawson, Inc. (“Company”) is committed to compliance with all US import laws and regulations, including the prohibition against importing goods mined, produced, or manufactured wholly or in part by convict, indentured, or forced labor, which includes forced or indentured child labor (“forced labor”). Under US law, there is a rebuttable presumption that merchandise produced wholly or in part in China’s Xinjiang Uyghur Autonomous Region (Xinjiang) or by an entity on the Uyghur Forced Labor Prevention Act (UFLPA) Entity List, was produced by forced labor and therefore is prohibited from entry into the US.

As an importer of various fabricated tubular parts and welded assemblies into the US, the Company is legally obligated to exercise reasonable care to ensure that its import transactions comply with all applicable laws and regulations, including the prohibition against importing goods produced by forced labor. Any failure to exercise reasonable care or to comply with the forced labor import prohibition may result in US Customs and Border Protection’s (CBP) detention or seizure of our merchandise. This can jeopardize our ability to sell our products in the US, harm our reputation, and potentially expose the Company to significant civil or criminal penalties. Compliance with the forced labor import prohibition is both an ethical imperative and a critical component of our reputation and success.

Statement of Policies and Procedures

The Company strictly prohibits the use of forced labor in its international supply chain. It is the Company’s policy not to enter a business relationship with any manufacturers, suppliers, or other vendors (collectively, “Suppliers”) that use or are suspected of using any form of forced labor, including in their own supply chains. The Company continuously assesses the risk of labor abuses in its supply chain and undertakes due diligence to ensure that its supply chain is free of forced labor, including labor that is subject to the UFLPA.

If the Company suspects that a supplier or any of the supplier’s subcontractors or other business partners is using forced labor, the Company will immediately commence an investigation. If the Company concludes that forced labor is in fact being used at any point in the supply chain, the Company will, as it considers appropriate under the circumstances, either require the supplier to implement corrective measures that eliminate all forced labor in accordance with a corrective action plan acceptable to the Company, or immediately cease doing business with the supplier.

As part of our forced labor due diligence, it is the Company’s policy to:

- Vet new and existing suppliers for forced labor risks, through questionnaires, on-site inspections, and other means.
- Screen our prospective purchases against US Department of Labor (DOL) lists of products and source countries that the DOL has reason to believe pose a risk of forced

labor and against US State Department lists of industries and countries at heightened risk and the UFLPA Entity List.

- Conduct audits, which may be announced or unannounced, of our suppliers' operations, to be performed by Company personnel, third-party auditors, or both.
- Require our suppliers to agree in writing to adhere to our Supplier Code and Purchase Order Terms and Conditions, which require our suppliers to:
 - ensure that neither they nor their sub-contractors or other supply chain business partners use forced labor at any point in the production process;
 - maintain a reliable system to verify the eligibility of all workers, including age eligibility and the legal status of foreign workers; and
 - promptly report to us any violation of our Supplier Code of Conduct (Supplier Code) and Purchase Order Terms and Conditions that the supplier becomes aware of, including the use of forced labor at any point in their own supply chain.
- Include terms and conditions in our contracts and purchase orders that:
 - prohibit our suppliers from using of any form of forced labor, including in their own supply chains;
 - require our suppliers to certify that merchandise sold to us was not produced or manufactured wholly or in part by forced labor;
 - require our suppliers to cooperate with any investigation by the Company into the suspected use of forced labor by the supplier or any of its business partners; and
 - allow the Company, on discovery of any use of forced labor, to immediately cancel the affected purchases and terminate the contractual relationship or require the supplier to take corrective action within a time frame set out in the terms and conditions.

Senior management is fully committed to ensuring that the Company sources its imported merchandise in compliance with all applicable laws and regulations and in a socially responsible manner. In furtherance of this commitment, senior management will ensure that sufficient resources are provided for the maintenance of internal controls and procedures to implement this policy. The Company's management will also ensure that the Company's employees receive sufficient training, appropriate to their responsibilities, to enable them to fulfill their obligations in accordance with this policy.

Maintenance and Implementation of Policy

The Purchasing department has primary responsibility for maintaining and implementing this policy and reviewing the Company's forced labor due diligence measures to ensure they are functioning properly. The Quality department will review the effectiveness of these procedures annually and will update the policy and procedures as necessary. Senior management will provide the Purchasing and Quality departments with the necessary support to fully implement this policy and related procedures.

Distribution of Policy

The Human Resources Department will provide all new employees with a copy of this policy as part of their orientation materials. A current copy of this policy will also be maintained on the Company's website: bdiweldedtubing.com

Training

Senior Management will ensure that all Company employees with environmental, social, and governance (ESG) responsibilities and responsibilities relating to the supply chain, including the acquisition and importation of merchandise from foreign suppliers, receive sufficient training to carry out this policy and ensure that the Company does not knowingly purchase or import any merchandise made wholly or in part by forced labor. Personnel receiving this training will include, but are not necessarily limited to, employees in our Purchasing, Quality and Human Resource departments.

Employee Responsibilities

It is the responsibility of all Company employees to immediately report any allegations regarding the possible use of forced labor in the Company's supply chain, either by phone through the Company's Human Resource Department at 636-431-2226 or confidentially to our helpline at 833-407-6259. Confidentiality will be maintained to the fullest extent possible.

Any employee who becomes aware of any governmental inquiry or investigation regarding the possible use of forced labor in the Company's supply chain must immediately notify the President at 636-225-5011.

Any employee who knowingly violates this policy is subject to appropriate disciplinary action, up to and including termination of employment. Similarly, the Company will terminate its contractual relationship with any supplier or other third party that knowingly violates this policy.

Questions Concerning the Policy

Any questions concerning the Company's policy on forced labor should be directed to the Human Resources at 636-431-2226.