



VENDOR

CODE OF CONDUCT

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World Leader in Process

Heating Solutions

Introduction

Thermon is committed to conducting business with the highest level of integrity in all aspects of our operations. Thermon expects the same commitment from the individuals or companies who provide goods and/or services to Thermon (collectively, “**Vendors**”), including agents, distributors, consultants, contractors, vendors and suppliers.

Thermon’s Vendor Code of Conduct (the “**Vendor Code**”) sets forth Thermon’s expectations for our Vendors and their respective supply chains. This Vendor Code is intended to complement Thermon’s Code of Business Conduct and Ethics, the Thermon Way, and the policies and procedures referenced therein. Adherence to the requirements set forth in this Vendor Code will be considered in making sourcing decisions. At Thermon, we use a due diligence process to identify and prevent any non-adherence with this Vendor Code. Failure to comply with this Vendor Code may result in suspension or termination of your relationship with Thermon and/or possible legal action. Thermon may visit (and/or have external monitors visit) third party facilities to assess compliance with this Vendor Code.

Ethical Business Practices

At Thermon, we are committed to upholding the highest standards of ethical business conduct, and we expect our Vendors to operate with the same high standards of business integrity and comply with the laws that apply to their business and their work with us.

Anti-Bribery

Thermon is committed to complying with the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act and the applicable anti-corruption and anti-money laundering laws of the countries in which we operate, and we expect the same from our Vendors.

Our Vendors may not give, receive or participate in bribes or kickbacks of any kind, whether in dealings with government officials or individuals in the private sector.

Books and Records

Our Vendors must honestly and accurately create, retain, and dispose of business information in compliance with applicable laws.

Fair Business and Competition

Our Vendors will comply with applicable fair business and competition laws, including fair trading and anti-trust laws.

Conflict of Interest

Our Vendors are required to uphold Thermon’s reputation and avoid conflicts of interest or situations giving the appearance of a potential conflict of interest.

A relevant conflict of interest typically occurs when personal interests interfere with or appear to interfere with our Vendors ability to perform the work/services without bias.

Our Vendors are expected to immediately notify Thermon if an actual or potential conflict of interest arises.

This includes any situations of potential or apparent conflicts between our Vendors or its employees’ personal interests and the interests of Thermon.

Trade Controls

Our Vendors should understand and will follow applicable international trade control laws and regulations, including those relating to economic sanctions, customs requirements and export controls.

Our Vendors should comply with applicable laws prohibiting cooperation with boycotts or restrictive trade practices imposed by laws of certain countries.

Intellectual Property

Our Vendors shall respect intellectual property rights and safeguard customer information.

Our Vendors shall manage technology and know-how in a manner that protects intellectual property rights.

Human Rights

At Thermon, we are committed to upholding the fundamental nature of human rights, as set forth in our Human Rights Policy. We expect our Vendors to protect and respect internationally human rights standards, including those principles set forth in the Universal Declaration of Human Rights, including the International Bill of Rights and the International Labor Organization's 1998 Declaration on Fundamental Principles and Rights to Work.

Conditions of Labor

Our Vendors shall pay applicable and fair legal wages, including paid overtime, under humane conditions, including maintaining reasonable employee work hours in compliance with applicable law and international standards.

Child Labor

We strictly prohibit child labor. The minimum age for employment or work shall be 16 years of age unless hazardous work is required and then the minimum age for employment or work is 18 years of age, the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher, with limited

Privacy & Information Security

Our Vendors shall protect confidential and proprietary information of Thermon, including confidential and proprietary information of others and personal data, from unauthorized access, destruction, use, modification and disclosure, through appropriate physical and electronics security procedures.

Our Vendors shall comply with applicable privacy and information security laws and regulatory requirements when personal data is collected, stored, processed, transmitted, and shared.

Our Vendors shall not use personal data further than necessary and for any other purpose than for which it has been collected.

Our Vendors shall immediately inform Thermon of any breach of personal data held by Vendor whereby personal data of Thermon has or has potentially been compromised.

exceptions for participation in legitimate workplace apprenticeship programs.

This Vendor Code does not prohibit participation in legitimate workplace apprenticeship programs.

Forced Labor

Our Vendors shall not traffic in persons or use any form of slave, forced, bonded, indentured, or involuntary prison labor, including transportation, harboring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Anti-Discrimination/Harassment

Our Vendors shall commit to a workplace free of harassment and unlawful discrimination.

Freedom of Association

Our Vendors shall respect the rights of workers, without distinction, to have the right to join or form trade unions of their own choosing and to bargain collectively.





Health & Safety

At Thermon, we care about our employees around the world and the communities in which they work and live, and we expect our Vendors to do the same.

Safe Working Conditions

Our Vendors shall commit to the safety and health of their employees and ensure that adequate personnel training has been completed before initiating work activity.

Our Vendors are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with applicable standards and/or regulations and by utilizing suitable means, e.g., design, engineering and administrative controls, preventative maintenance, training, work procedures, and appropriate personal protective equipment.

Environment & Sustainability

At Thermon, we commit to reduce the environmental impact of our operations. We expect our Vendors to work to address adverse (and potentially adverse) effects that their operations cause to the community, environment, and natural resources.

Operational Sustainability

Our Vendors must comply with applicable environmental laws and regulations including laws and regulations that regulate hazardous materials, air and water emissions and wastes.

Product Sustainability

If applicable, our Vendors must identify any chemicals or other hazardous materials that may be released, and which may pose a threat to the environment, and manage such chemicals or materials appropriately to ensure their safe handling, movement, storage, use, reuse, recycling, and disposal.

Responsible Mineral Sourcing

Our Vendors shall have a conflict minerals policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country.

Our Vendors shall exercise a due diligence process to identify the source and chain of custody of these minerals and make their due diligence measures available upon request.