

# SUPPLIER AND BUSINESS PARTNER CODE OF CONDUCT

### Introduction

Albany International is committed to doing business in a way that is ethical, legal, and environmentally and socially responsible, as well as creating value for its stakeholders. To that end, we have formalized guidelines meant to direct and support Albany International's Business Partners and suppliers ("Suppliers") of all subsidiaries under Albany International.

The principles outlined in this Code of Conduct serve as minimum standards for our business relationships, thus outlining the non-negotiable minimum standards Albany International requires of its Business Partners, Suppliers and sub tier suppliers. It is further expected that Suppliers and Business Partners will insist upon these same standards of conduct for their own suppliers, sub-contractors, agents, and entire supply chain.

The Code of Conduct is based on the following international guidelines and principles:

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination against Women
- OECD Guidelines for Multinational Enterprises
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work
- Paris Climate Agreement
- Minamata Convention
- Stockholm Convention
- Basel Convention
- The ten principles of the UN Global Compact (UNGC)

### 1. Information Accuracy and Transparency

Suppliers and Partners shall keep transparent and up-to-date records of the elements relevant to demonstrate compliance with this Code of Conduct and must commit to the accuracy of the information to be provided upon request.

Albany International reserves the right to ask Suppliers for a full supply chain mapping back to origin to facilitate assessment of upstream supply chain compliance with this Code of Conduct, and the Supplier shall be able to disclose all the potential sources of primary origin (country of



origin) to Albany International. Unless clearly justified by confidentiality requirements, Suppliers shall without undue delay provide access to the information required.

Following reasonable prior notice by Albany International, Suppliers shall accept audit requests by Albany International or third party designated by Albany International to assess conformance with this Code of Conduct and shall during this time grant access to information and to the areas of their facilities that are relevant with assessing compliance with this Code of Conduct.

2. Compliance with National and International Laws and Regulations

Suppliers must conduct their business in full and strict compliance with all of the applicable laws, codes, rules, and regulations of the countries, provinces, states, regions, and cities in which they operate.

Suppliers are subject to Albany International's Business Ethics Policy and as such must comply with all applicable International and National laws and regulations including without limitations to pertaining to anti-corruption, transportation, health and safety, trade and customs.

3. Respect for Workplace Relations and Human Rights

# 3.1 Compensation (wages and benefits)

Suppliers must pay workers at least the minimum wage as required by local legislation and provide all statutory benefits. Albany International requires Suppliers to provide employees with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work. All use of temporary, dispatch, and outsourced labor shall be in accordance with all applicable laws and regulations.

# 3.2 Child Labor

Suppliers must comply with the local legislation related to the minimum age for employees. Also, Albany International does not tolerate child labor in any form at any stage of its supply chain, hence, Suppliers shall ensure that there is no child labor of any sort in its business operations. The term "child," unless otherwise specified by applicable laws regarding minimum working age, refers to any person under the age of 15 (or 14 according to the applicable local laws), or under the minimum age for completion of compulsory education, or under the minimum age for employment in any particular country, whichever is the highest (in line with the ILO Convention 138 on Child Labor).

# 3.3 Forced Labor/ Human Trafficking

Albany International does not tolerate slavery, forced labor, or human trafficking in any form at any stage of its supply chain. Suppliers must not use forced labor of any kind; all forms of employment must be voluntary, and all workers must be free to leave upon reasonable notice. Albany International requires Suppliers to fully comply with and enact practices to ensure



compliance with the applicable legal requirements of human rights, slavery, forced labor and human trafficking laws and regulations, such as those outlined in the UK Modern Slavery Act of 2015, Canada's Modern Slavery Act, and the Australian Modern Slavery Act of 2018, as well as requirements related to supply chain due diligence, such as those outlined in the German Act on Corporate Due Diligence Obligations in Supply Chains.

### 3.4 Harassment

Suppliers must treat all workers with respect and dignity. Suppliers' workplaces must be free of any forms of harassment and human rights violations such as corporal punishment, physical, sexual, psychological, verbal abuse, threats, bullying, or disrespectful behavior of any kind.

### 3.5 Working Hours

Suppliers must abide by the working hours as capped by the local legislation in force and shall ensure that their employees work in compliance with all applicable laws and mandatory industry standards pertaining to regular working hours and overtime hours.

# 3.6 Freedom of Association and Right to Collective Bargaining

Albany International requires Suppliers to acknowledge and respect any of the workers' rights regarding their exercise of their legal rights to associate freely, including whether or not to join any associations, unions, seek representation, and join employee committees, according to the local laws. Workers must be free to engage in these activities without retaliation, harassment, or intimidation. Suppliers must also respect any of the workers' legal rights to collective bargaining.

### 3.7 Hiring or Use of Private or Public Security Forces

Albany International requires that Suppliers that hire or use private or public security forces for protection must provide sufficient instruction and oversight to avoid inhumane, degrading treatment, torture, cruelty, or damages to life or limb of individuals, and the impairment of workers' freedom of association.

### 4. Environmental Sustainability

Suppliers must meet all the mandatory environmental standards under relevant laws, codes, and regulations applicable to the workplace, the products manufactured, and the manufacturing methods. Additionally, Suppliers must use only materials originating from operations which abide by the environmental laws and regulations from their country of origin.

Suppliers shall strictly abide by all applicable laws and regulations related to hazardous materials, chemicals, and substances.

Suppliers shall measure, manage, and address energy usage and greenhouse gas (GHG) emissions, manage use of water or other natural resources, and appropriately manage waste in



their operations where applicable. Also, Suppliers shall implement and document relevant environmental management systems with the objectives to:

- Improve resource and energy efficiency
- Maximize recycling and minimize generation of waste
- Limit emissions to soil, water, and air to permissible levels

Suppliers shall ensure their raw materials are responsibly sourced according to accepted best practices and/or relevant local laws and regulations.

### 5. Responsible Business

Albany International is committed to upholding the highest ethical standards and complying with all applicable laws, rules, and regulations and in turn requires Suppliers to do the same, and at a minimum, to adhere to the following:

### 5.1 Ethics and Integrity

Suppliers are expected to conduct business in a transparent and ethical manner and shall not participate directly or indirectly in any illegal, corrupt, or improper business practices. All forms of corruption are strictly prohibited.

Suppliers are subject to Albany International's Business Ethics Policy and as such must not take part in bribery, kickbacks, fraudulent bidding, cartels, or other unfair business practices.

### 5.1a Anti-Bribery and Anti-Corruption

Suppliers must fully comply with all applicable anti-bribery and anti-corruption laws including but not limited to relevant acts such as the U.S. Foreign Corrupt Practices Act or the UK Bribery Act.

#### 5.1b Gifts

In accordance with Albany International's Business Ethics Policy, our employees may not accept the following from any competitors, customers, suppliers, entities, financial agents, or any other persons with whom Albany International does substantial business or maintains significant financial relationships, specifically:

- Compensation of any kind, except as specifically approved in advance by the Audit Committee
- Any cash payment, or any bribe or 'kickback' of any kind
- Any gift(s) or favor(s) from such a person or entity, except promotional items of nominal value, such as baseball caps or pads of paper
- Any entertainment that might be viewed as lavish or excessive under local practice and customs



Suppliers must not offer or accept any gift or anything else of value to obtain improper advantages or influence for the Supplier, for Albany International (including Albany International employees and/or their family members and associates), or for any third party.

### 5.1c Non Retaliation for Reports of Concern

Albany International expects Suppliers to have a policy and process in place for recording and reporting of workplace concerns. The policy and process should be transparent and understandable and must provide protection from retaliation, for both reporters and for those participating in any related investigations.

#### 5.1d Trade and Sanctions

Suppliers must comply with all applicable trade and sanctions, laws, and regulations.

### 5.2 Data Privacy and Security

Albany International requires that its Suppliers must design and maintain processes to provide appropriate protection for Albany International's and its customers' confidential assets and information. Confidential information means any of Albany International's proprietary:

- Technological and technical knowledge, expertise, experience, know-how, inventions, instructions, product and production data, techniques, processes, drawings, designs, specifications, formulae, samples and other such information and data
- Financial, business and personnel information
- Other information, disclosed at any time and in any form, which is marked or notified as being confidential or would, in the exercise of reasonable judgment under the circumstances, be considered as confidential information

This information must only be used, accessed, and disclosed as permitted by the Supplier agreement and in compliance with all applicable laws and regulations.

#### 5.3 Inclusion and Diversity

Albany International fosters an inclusive culture and believes that diversity should be celebrated, and discrimination of any form shall not be tolerated.

### 5.3a Non-Discrimination and Workplace Diversity

Suppliers must comply with all applicable laws and regulations relating to discrimination in hiring, employment practices, and harassment and retaliation. Suppliers must operate workplaces free of unequal treatment in employment, discrimination, victimization, and any other abuse on any grounds including but not limited to age, health status, disability, ethnic or social origin, gender, gender identity, nationality, race, sexual orientation, marital status, parental status, pregnancy,



political convictions, religion or beliefs, union affiliation, or veteran status. Unequal treatment includes the payment of unequal remuneration for work of equal value.

### 5.3b Supplier Diversity

Albany International is committed to advancing supplier diversity in its strategic purchases and expects Suppliers to: (i) utilize search and assessment processes that are both unbiased and transparent, (ii) ensure that Suppliers' procurement teams proactively provide diverse businesses with fair access to bids, and (iii) where practicable, actively seek out and provide opportunities for diverse suppliers to participate in business opportunities.

### 6. Wellbeing, Health, and Safety

Suppliers shall provide a safe and healthy working environment for all personnel including employees and/or contractors and other third parties and shall ensure that all workers are sufficiently aware of health, safety and environmental risks and appropriately trained on these issues.

Suppliers must keep the workplace free of known risks and ensure compliance with all laws applicable to working conditions, including workers' safety and health, sanitation, fire safety, risk protection and electric, mechanical, and structural safety, emergency, injury and occupational disease readiness, industrial hygiene and safety, physically demanding tasks, machine protection, and cafeteria safety.

Suppliers must ensure that there is a process for continual monitoring and improvement of the work environment and a management representative responsible for the health and safety of all personnel.

### 7. Compliance with the Code

### 7.1 Reporting Violations

Suppliers and anyone who finds that these principles have been violated must contact Albany International via e-mail at Compliance@albint.com or <u>EthicsPoint - Albany International</u> Suppliers must promptly forward to Albany International, if permitted by law, any subpoenas, regulatory requests, media inquiries, or other third-party requests concerning Albany International.

### 7.2 Albany International's Rights

Albany International reserves the right to ensure and enforce Suppliers' compliance with this Code of Conduct and to cancel outstanding orders, suspend future orders or terminate our business relationship with any suppliers that are either unwilling or unable to abide by this Code of Conduct.

### 7.2a Supplier Selection



Albany International will evaluate Suppliers' compliance with this Code during the Suppliers' evaluation, selection, or onboarding process, and/or at any other time during the Suppliers' business relationship with Albany International.

### 7.3 Assessment and Rights to Audits

Supplier and Partner assessment supports Albany International's commitment to the United Nations Global Compact, to broader professional standards, and to managing risks across the supply chain. Assessment is a critical element of due diligence to identify, prevent, mitigate, account for, and enable the remediation of adverse impacts in the supply chain related to topics addressed in this Code, including but not limited to environmental sustainability, human rights, labor, and ethics. Suppliers and Business Partners may be required to affirm their acceptance and compliance with the Code during the Supplier certification process and may be asked to reaffirm compliance with the Code periodically. Upon request, Suppliers and Business Partners will be required to provide written information on its policies and practices related to compliance with the Code.

In addition, Albany International may at times request that certain Suppliers complete an evidence-based assessment scored by a third party or allow an on-site audit to monitor conformance with and encourage continuous improvement against this Code and other relevant issues. Albany International is committed to working with Suppliers to improve performance on topics addressed by this Code and may at times request that Suppliers take specific corrective actions related to this Code and other relevant issues. Albany International expects Suppliers to agree to work together to jointly address applicable and relevant topics.

# 7.4 Non-Compliance, Violations and Termination

If Albany International finds a Supplier is not meeting the requirements and expectations set out in this Code of Conduct, the Supplier shall take immediate corrective actions to improve the situation. Albany International may offer to work with the Supplier to develop and implement corrective actions. However, Albany International reserves the right to terminate its business relationship with any Suppliers that are either unwilling or unable to abide by this Code of Conduct.

Updated and adopted in January 2025



### Attestation

We have read, understood, and commit to adhering to the principles of this Supplier and Business Partner Code of Conduct.

Signature and Company Seal (if any)

Name & Position

Company

Date

References

Modern Slavery Act 2015 (legislation.gov.uk) Federal Register of Legislation - Modern Slavery Act 2018 Criminal Division | Foreign Corrupt Practices Act (justice.gov) Bribery Act 2010 (legislation.gov.uk) Public Bill (Senate) S-216 (43-2) - First Reading - Modern Slavery Act - Parliament of Canada International Bill of Human Rights | OHCHR Topics | OHCHR OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD ILO Declaration on Fundamental Principles and Rights at Work | International Labour Organization The Paris Agreement | UNFCCC Homepage | Minamata Convention on MercuryOverview Basel Convention - Home Page The Ten Principles | UN Global Compact