

SUPPLIER CODE OF CONDUCT



BOYD
CORPORATION

Introduction

Boyd Corporation¹ has operated with high ethical business standards and integrity in communities where we operate and live for nearly 100 years. The success of our business depends on the trust and confidence we earn from our employees, customers, suppliers, distributors and shareholders. We gain credibility by honoring our commitments, showing respect to others, working with integrity and reaching company goals through honest conduct and compliance with all applicable laws and regulations.

Boyd is committed to operating with the highest standards for ethical conduct, human rights, and environmental, social and corporate responsibility throughout our supply chain. This Supplier Code of Conduct (the “Code”) outlines our guidance and expectations as to how we expect our suppliers to conduct business and instructions for how to report and escalate questions and concerns. This Code applies to all global suppliers, contractors, sub-contractors, and temporary personnel (individually, a “Supplier” or “you”, or collectively, “Suppliers”).

In addition to the responsibilities listed in this Code, Suppliers must comply with all applicable laws, regulations, directives, guidelines, and contractual obligations in any contract a Supplier may have with Boyd.

Boyd requires its Suppliers to understand this Code and take all necessary steps to act in accordance with this Code. Suppliers must maintain and have documentation readily available to demonstrate compliance with this Code and provide Boyd or Boyd’s representatives with access to such

documentation and Supplier’s facilities for auditing purposes. If Boyd requests additional certifications, such as ISO 50001, 14001 or OHSAS 18001, Suppliers will make good faith efforts to obtain such certifications in a timely manner. Although we seek to work collaboratively with Suppliers to improve conditions, Boyd may terminate its relationship with any Supplier that fails to meet the responsibilities and obligations set out in this Code.



This Code is based on international standards of ethical behavior, human rights, corporate social responsibility and sustainability, including the guiding principles of the Organization for Economic Co-Operations and Development (OECD), the United Nations Global Compact, the United Nations Convention Against Corruption, the United Nations Guiding Principles on Business and Human Rights (UNGPs), Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and the Responsible Business Alliance Code of Conduct.

¹ “Boyd Corporation” or “Boyd” collectively includes LTI Holdings, Inc. and its subsidiary and affiliate companies.

Business Integrity and Ethics

Suppliers shall conduct their business in an ethical manner and act with the highest standards of integrity.

No Improper Advantage

All corruption, bribery, extortion, money laundering, and embezzlement are strictly prohibited. Suppliers must have a zero-tolerance policy and shall not directly or indirectly pay, promise, offer, authorize, give or accept bribes or anything of value in order to obtain or retain business, direct business to any person, gain an improper advantage. Suppliers shall at all times comply with international anti-corruption and anti-bribery laws, including without limitation, the U.S. Foreign Corrupt Practices Act and the UK Bribery Act.

Personal interest or relationships shall not influence Supplier's decision making. Suppliers must be proactive in managing potential conflicts of interest in collaboration with Boyd. All business dealings should be transparently performed and accurately reflect Suppliers' financial and other records.

Fair Competition

Suppliers are required to conduct their business consistent with fair competition and in compliance with all applicable anti-trust and competition laws, rules and regulations. Suppliers must use fair business practices, including accurate and truthful advertising.

Privacy

Suppliers shall protect the reasonable privacy expectations of personal information of everyone with whom they do business, including customers, vendors, consumers, and employees. Suppliers must comply with all privacy and information security laws and regulatory requirements when collecting, handling, storing, processing, transmitting, and sharing personal information.

Identification of Concerns

All workers should be encouraged to report concerns or illegal activities in the workplace, without threat of retaliation, intimidation or harassment. Suppliers are expected to investigate and take corrective action if needed.

Intellectual Property

Intellectual property rights are to be respected, and any transfers of technology and know-how must be conducted in a manner that protects intellectual property rights. Supplier shall not disclose Boyd's or Boyd's customer's proprietary information without a valid business reason and without proper authorization and protective measures.



Responsible Sourcing of Minerals

Boyd strictly condemns all activities associated with the unlawful exploitation and trade of minerals, which benefits armed groups in areas in a state of conflict or post-conflict. This also includes areas with weak or nonexistent governance and security, such as failed states and areas with widespread violations of international law, including human rights abuses.

Suppliers shall conduct due diligence on their own supply chains to detect the presence of conflict minerals (including tantalum, tin, tungsten and gold) and the violations connected to flow of funds into armed groups and violence, child labor, forced labor, human trafficking,

occupational health and safety violations, or other human rights violations. Suppliers must adopt appropriate policies and management systems according to the OECD Due Diligence Guidance Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Suppliers shall adhere to all applicable laws and regulations related to the responsible sourcing of materials, including without limitation, Section 1502 of the U.S. Dodd-Frank Wall Street Reform and Consumer Protection Act and the European Union (EU) Conflict Minerals Regulation.

Respect for People

Boyd is committed to upholding the human rights of its workers and ensuring that all workers in its supply chain are treated fairly, with dignity and respect, and in accordance with all fair labor practices. This applies to all workers including direct employees, temporary, migrant, student, contract, and any other type of worker.

Freely Chosen Employment and Modern Slavery

Suppliers shall not:

- Support or engage human trafficking, slavery or any other forms of servitude.
- Use forced, coerced, compulsory, bonded, indentured or involuntary labor.

All employment must be voluntary, and workers should be free to leave or terminate their employment upon reasonable notice. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company- provided facilities including, if applicable, workers' dormitories or living quarters. All use of temporary, dispatch and outsourced labor shall be within the limits of the local law.

Young Workers

We will not tolerate the exploitation of children. Suppliers shall not employ or utilize any workers:

- under the age of 16
- under the age for completing compulsory education
- under the minimum age for employment in the applicable country.

Suppliers shall implement the appropriate controls to verify the age of workers. Boyd supports the use of legitimate workplace apprenticeship and workplace learning programs, as long as those programs comply with all laws and regulations.

Suppliers must ensure proper management of student workers through the appropriate maintenance of student records, rigorous due diligence of educational partners, training, and protection of students' rights in accordance with applicable laws and regulations. In the absence of local law, the wage rate for student workers, interns, and apprentices should be at least the same wage rate as other entry-level workers performing equal or similar tasks.

Learn more about Boyd's position on:

- **Human Rights Statement**

<https://info.boydcorp.com/hubfs/Company/About-Us/Boyd-Human-Rights-Statement-2020.pdf>

- **Anti-Slavery and Human Trafficking Statement**

<https://info.boydcorp.com/hubfs/Company/About-Us/Boyd-Anti-Slavery-and-Human-Trafficking-Statement-2020.pdf>



Wages, Benefits and Working Hours

Suppliers shall pay workers according to applicable wage laws, including those relating to minimum wages, overtime hours and mandated benefits. Working hours are not to exceed the maximum set by local law and workers must be allowed minimum breaks and rest periods as required by local law. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates.

Freedom of Association

Open communication and direct engagement with workers to resolve workplace and compensation issues is encouraged. Suppliers shall respect the rights of workers, as set forth in local laws, to associate freely, join or not join labor unions, seek representation and join workers' councils. Workers must be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Fair Treatment, Non-Discrimination, and Non-Harassment

Suppliers shall provide a workplace free from, and without the threat of, harsh or inhumane treatment, including any violence, discrimination, sexual or gender harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers. Suppliers and their workers shall not engage in discrimination or harassment based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers must be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

Diversity, Equality and Inclusion

Establishing a diverse, equal, and inclusive culture is central to everything we do at Boyd. We expect our Suppliers to share our commitment to building a workforce that better represents our world and ensures that every worker feels like they truly belong on our team.



Boyd is committed to including and supporting high-performing, small and diverse suppliers in their supply chains as a component of our global commitment to making a positive and lasting impact in our industries and our communities.

Ensuring our supply base reflects our customers, employees, and the communities where we live and work is a key business strategy of Boyd. As such, Boyd believes in including and supporting minority-owned, women-owned, veteran owned, LGBT-owned, historically underutilized businesses and small businesses enterprises in its supply base.

Suppliers are expected to demonstrate a commitment to identify, measure, and improve a culture of diversity and inclusion through all aspects of workplace management.

Health and Safety

Suppliers shall provide workers with a healthy and safe work environment.

Occupational Safety

Suppliers will comply with all applicable safety and health laws and regulations, and identify, assess, and mitigate worker exposure to safety and health hazards, including without limitation, chemical, biological, physical, and ergonomic stressors, through proper design, engineering controls, preventative maintenance, safe work procedures, and ongoing health and safety guidance and training. Where these means cannot adequately control hazards, suppliers will protect workers with appropriate personal protective equipment and provide them with information about risks to them from these hazards. Suppliers will implement procedures to prevent, manage, track, and report occupational injury and illness, including encouraging worker reporting, classifying and recording cases, providing medical treatment, investigating cases, implementing corrective actions, and facilitating workers' return to work. Suppliers shall maintain an effective safety policy and management system consistent with ISO 45001.

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks, light curtains and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers. Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

Emergency Preparedness

Suppliers will identify and plan for potential emergencies and will implement emergency plans and provide guidance to workers on emergency response procedures, including emergency reporting, worker notification and evacuation, drills, fire detection and suppression equipment, exit facilities, and recovery plans.

Sanitation, Food, and Housing

Suppliers will provide workers with ready access to clean toilet facilities, safe drinking water, and sanitary food preparation, storage, and eating facilities. If suppliers provide workers with residential facilities, those facilities will be clean and safe, with adequate personal space, entry and exit privileges, emergency egresses, heat and ventilation, and hot water for bathing and showering.

Health and Safety Communication

Suppliers must provide workers with appropriate workplace health and safety information and regular training in the language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information will be clearly posted in the facility or placed in a location identifiable and accessible by all workers. Workers should be encouraged to report any health and safety concerns without retaliation.

Environment and Sustainability

Sustainability and protecting the environment are a priority at Boyd, and we take our responsibility for environmental stewardship seriously. We want Boyd's Suppliers to share our focus on implementing initiatives to reduce our collective global environmental footprint, including the utilization of renewable energy sources, lowering energy usage and greenhouse gas emissions, minimizing waste, considering product life cycles and responsible product content, and implementing circular economy principles to minimize our impact to the environment and conserve the Earth's resources.



Environmental Management Systems and Permits

Suppliers shall maintain an effective environmental policy and environmental management system, consistent with ISO 14001, that promotes environmental responsibility and enables continuous improvement of their environmental performance and impact. Boyd reserves the right to ask for evidence of, and the possibility to audit, the environmental management system. Supplier shall obtain and keep current all required environmental permits (e.g. discharge monitoring), approvals, and registrations and adhere to their operational and reporting requirements.

Resource Efficiency and Clean Energy

Suppliers are expected to control and implement actions to reduce their consumption of resources, including the use of energy, water, raw materials and packaging materials. Suppliers should track, document, and seek to minimize energy consumption, waste, and greenhouse gas emissions. Suppliers shall seek ways to improve energy efficiency and the use cleaner sources of energy. Boyd may require detailed and regular reporting of data metrics on such usage and initiatives.

Waste Management

Suppliers will work to reduce or eliminate waste of all types, including without limitation wastewater, solid waste and stormwater management. Where waste cannot be eliminated, Supplier shall manage and control all waste streams in an environmentally responsible and secure way and as required to comply with applicable laws and regulations. Suppliers shall implement a management program that documents, characterizes, monitors, controls and treats waste as required prior to discharge or disposal; seeks opportunities to conserve resources; and controls channels of contamination. Participants shall conduct routine monitoring of the performance of its waste treatment and containment systems to ensure optimal performance and regulatory compliance.

Hazardous and Restricted Substances

Suppliers will comply with all applicable hazardous materials and restricted substances laws and regulations. Suppliers will identify and manage chemicals and other materials that pose a hazard to the environment, to ensure their safe handling, use, storage, and disposal. Suppliers will identify, monitor, control, treat, and reduce hazardous air emissions, wastewater, and waste generated from its operations. Suppliers will adhere to Boyd's requirements restricting use of specific substances, including labeling for recycling or disposal.



Management System

Suppliers shall use effective management systems to facilitate continual improvement and compliance with the expectations of these principles.

Suppliers shall adopt or establish a management system with a scope that is related to the areas described in this Code. An effective management system will include executive level commitment and accountability; processes to identify, monitor, and comply with all applicable laws, regulations, standards, and requirements; risk assessments and risk management; clearly communicated roles and

responsibilities; relevant training and instructions; established performance evaluation of measurable goals, audits and control systems; and ongoing assessments, monitoring and continuous improvement - including the implementation of corrective actions where appropriate.

Reporting and Questions

Suppliers will accurately disclose information regarding their labor, health and safety, environmental practices, business activities, structure, financial situation, and performance, in accordance with prevailing industry practices.

If a Supplier wishes to report questionable behavior or a possible violation of this Code or law, Supplier is encouraged to work with its primary Boyd contact to resolve any concerns. If that is not possible or appropriate, Supplier can anonymously or directly contact Boyd through the following third-party hosted Ethics Hotline in the language of its choice:

- **International Direct and United States:**

+1 (844) 990-0400

- **Local Country Phone Numbers:**

Go to www.lighthouse-services.com/boydcorp to find your respective country's local tollfree phone number.

- **Submit Online:**

Go to www.lighthouse-services.com/boydcorp.

Boyd will maintain confidentiality to the extent possible. Boyd encourages a transparent and open culture and will not tolerate any retribution or retaliation against any individual or Supplier for raising any genuine ethical, legal, health and safety or other concerns in good faith. If a Supplier feels that it may have been retaliated against, it should report that behavior immediately.