

# MILLER INDUSTRIES, INC.

## SUPPLIER CODE OF CONDUCT

### **Statement on Objectives**

Miller Industries, including its subsidiary companies (the “Company” or “We”), strives to uphold the highest standards of corporate citizenship, preserve our Code of Business Conduct and Ethics (the “Code”), and ensure sustainability throughout all facets of our operations.

We expect our network of global suppliers, contractors, vendors, and consultants (including their employees and subcontractors, collectively referred to herein as “Suppliers”) to uphold our high standards of sustainability, integrity, values, and operating principles. We also expect them to comply with applicable laws, rules, and regulations of the country in which they operate, as well as the guidelines of this Supplier Code of Conduct (the “Supplier Code”).

In addition, all Suppliers are expected to provide applicable information to the Company, or take other actions necessary, to allow the Company to fulfill its reporting disclosures and other legal obligations.

### **Statement on Applicability**

The Company’s suppliers are expected to comply with this Supplier Code unless local laws limit or prohibit compliance.

### **Expectations for Supplier Conduct**

Our Suppliers must comply with all applicable laws and regulations including those related to labor, employment, environmental stewardship, health and safety, product design, manufacturing, packaging, labeling, as well as import and export activities. Suppliers must also strive to protect the Company’s reputation. In addition, we expect all Suppliers to comply with the following:

#### **1. Business Practices**

- a) Anti-Corruption, Anti-Bribery, and Anti-Money Laundering – Suppliers must comply with all applicable anti-bribery and anti-corruption laws including the U.S. Foreign Corrupt Practices Act and the UK Anti-Bribery Act. Bribes, kickbacks, and similar payments are strictly prohibited. Additionally, the following conduct is expressly prohibited:
  1. Payment or receipt of money, gifts, loans, or other favors which may tend to influence business decisions or compromise independent judgment;
  2. Payment or receipt of rebates or kickbacks for obtaining business for or from the Company;

3. Payment of bribes to government or public officials to obtain favorable rulings, advantage, or business;
  4. Any activity involving money laundering; and
  5. Any other activity that would similarly degrade the reputation or integrity of the Company.
- b) Fair Competition and Antitrust – Suppliers must conduct their business in compliance with applicable fair competition and antitrust laws. Additionally, Suppliers are expected to uphold standards of fair business and competition, including avoiding business practices that unlawfully restrain competition; improper exchange of competitive information; and price fixing, bid rigging, or improper market allocation.
- c) Conflicts of Interest – Suppliers are expected to avoid any actual or potential conflict of interest and must disclose any such conflict of interest to Miller Industries.
- d) International Trade Law, Export/Import controls, Sanctions, and Embargoes – Suppliers must comply with applicable laws and regulations governing international trade, including the import, export or re-export of goods, software, services, and technology. Suppliers must make accurate customs declarations and provide the Company with information regarding supplied goods and services upon request, such as commodity classification codes, country of origin, and export control classifications. Additionally, Suppliers must comply with all applicable restrictions on trade and economic sanctions involving certain countries, regions, companies, entities, and individuals.
- e) Government Contracting – Miller Industries frequently acts as a contractor or subcontractor to the U.S. and foreign government agencies. Those government agencies commonly include additional stipulations for contractors as part of the procurement process, some of which are required to be passed down to lower tier suppliers.

The Company will notify you when placing an order that is part of a government acquisition with additional stipulations, such as compliance with certain Federal Acquisition Regulations (FAR) or Defense Federal Acquisition Regulation Supplements (DFARS), by indicating such and listing those stipulations on the purchase order or other formal communication.

- f) Counterfeit Parts – Suppliers are expected to minimize the risk of introducing counterfeit and/or diverted parts and materials into deliverable products and adhere to relevant technical regulations in the product design process.
- g) Quality Assurance – Miller Industries is recognized as the global leader in towing and recovery equipment. For us to sustain this position, our Suppliers must ensure that their deliverables meet or exceed all applicable purchase requirements, including quality and engineering standards and specifications. In order to consistently provide products that meet our requirements, we encourage all Suppliers to develop, implement, and maintain a Quality Management System that is aligned with the requirements of ISO 9001.
- h) Conflict Minerals – The Company encourages its suppliers to responsibly source conflict minerals and derivative metals within the DRC and neighboring countries from conflict-free mines and smelters (those which do not fund armed groups engaged in conflict and human

rights abuses) to prevent an embargo and associated worsening of economic conditions and human suffering.

- i) Data Protection and Privacy – Suppliers must protect any information or property entrusted to them by the Company, including intellectual property, trade secrets, financial information, and any other confidential information to which the Supplier has access. Additionally, Suppliers are expected to comply with applicable privacy laws and regulations within their local jurisdictions, such as the General Data Protection Regulation (GDPR), California Consumer Privacy Act (CCPA), Virginia Consumer Data Protection Act (VCDPA), and others.

## **2. Labor and Employment Practices**

- a) Human Rights – Suppliers must acknowledge and respect internationally recognized human rights of workers, local communities, and other relevant stakeholders. Suppliers are expected to take measures to reduce the risk of potential human rights violations in their operations and throughout their value chains. We are aware that our suppliers may come into contact with vulnerable or protected groups, as included in the UN Declaration on the Rights of Indigenous People, and We expect our suppliers to comply with international standards and ensure due care is given to these communities so that their rights are not infringed upon.
- b) Child Labor – Suppliers must comply with local minimum employment age requirements in their business activities and throughout their supply chain. In the absence of local laws, suppliers should follow the guidelines prescribed by the ILO Minimum Age Conventions.
- c) Forced Labor, Human Trafficking, and Slavery – Suppliers must not use any forced labor in their operations, whether in the form of prison labor, bonded labor, indentured labor, slavery, or otherwise. Suppliers are expected to fairly compensate all employees. Suppliers must not participate in any form of human trafficking in which force, fraud, or coercion is used to obtain some type of labor.
- d) Harassment and Discrimination – Suppliers are expected to treat employees with respect and dignity, and must not subject any employee to any physical, sexual, psychological, or other form of abuse. Suppliers are encouraged to support diversity, equity, and inclusion in their workplaces, and they are expected to provide equal employment opportunities regardless of worker or applicant characteristics such as race, gender, ethnicity, nationality, religion, age, disability, sexual orientation, gender identity, or marital status.
- e) Wages, Benefits, and Working Hours – Suppliers must comply with all applicable local wage and labor laws that govern employee compensation, benefits, and working hours.
- f) Occupational Health and Safety – The health and safety of employees is of the utmost importance to Miller Industries. We expect Suppliers to provide workers with a safe and healthy work environment. Suppliers are encouraged to take proactive measures that support accident prevention and minimize risk exposure. Suppliers must ensure their

operations comply with all applicable laws and regulations related to occupational health and safety.

- g) Freedom of Association and Collective Bargaining – Suppliers are expected to allow workers to communicate openly with management regarding working conditions and management practices without fear of reprisal, intimidation, or harassment. Suppliers are expected to allow workers to join or not join associations, and bargain collectively, in accordance with local laws.

### **3. Environment**

- a) Environmental Compliance and Sustainability – Miller Industries is committed to complying with all relevant environmental laws and regulations, as well as promoting a culture of environmental sustainability and conservation. We aim to limit our environmental impact through sustainable business practices and operational efficiency that reduces waste, emissions, energy intensity, and resource depletion.

In turn, our Suppliers must comply with all applicable environmental laws and regulations. Additionally, Suppliers are encouraged to conduct their business in a way that demonstrates dedication to sustainability and minimizing harmful environmental impact.

- b) Greenhouse Gas Emissions – Suppliers are encouraged to take appropriate measures to limit air emissions that have a negative impact on the environment and human health. Suppliers are expected to disclose to the Company their overall greenhouse gas emissions (scopes 1, 2, and 3) in tons of CO<sub>2</sub> when requested.
- c) Energy – We encourage Suppliers to conduct their operations in an energy-efficient manner, take steps to reduce energy use when feasible, and utilize renewable energy sources when practical.
- d) Water – Suppliers are encouraged to take a responsible approach regarding water use and to conduct their operations in a manner that limits pollution to waterways.
- e) Waste – Suppliers must comply with all applicable hazardous waste regulations. Suppliers are encouraged to abide by international agreements governing waste generation and management, including the Minamata Convention for mercury-containing waste and the Basel Convention for the export of hazardous waste. Additionally, we encourage Suppliers to take appropriate measures to limit their waste generation and utilize waste diversion methods when practical, such as recycling, reusing, or energy recovery.
- f) Use of chemicals – Suppliers must comply with all regulations governing chemical use and export. Suppliers are expected to provide notification if any materials or goods they are furnishing the Company contain Substances of Very High Concern as defined in the EU’s REACH regulation, “persistent organic pollutants” as defined in the Stockholm Convention, or per- or polyfluoroalkyl substances as defined in the Toxic Substances Control Act.
- g) Environmental Management System – Miller Industries is committed to following the principles and requirements of ISO 14001 and continual improvement of its Environmental

Management System. We encourage all Suppliers to develop, implement, and maintain an Environmental Management System that is aligned with the requirements of ISO 14001.

**Statement on Administration, Oversight, and Monitoring**

Miller Industries maintains discretion to engage in monitoring activities to assess compliance with this Code, including on-site evaluation of facilities and accounting records. Suppliers who do not meet the requirements of this Code will be provided a reasonable timeline to achieve the standards of this Code. Miller Industries reserves the right to terminate its business relationship with any Supplier who fails to do so or refuses to comply with the Supplier Code.