



Vendor Code of Business Conduct

This Vendor Code of Business Conduct (the “**Vendor Code**”) sets out certain minimum standards of conduct and business practices required of the vendors, suppliers, representatives, agents, subcontractors and business partners (collectively, the “**Vendors**”) of AZZ Inc. and its subsidiaries (collectively, “**AZZ**”).

AZZ is committed to conducting business in an ethical, legal and socially responsible manner, and to act professionally and fairly in all business dealings and relationships. We seek to maintain high ethical standards and to comply with all applicable laws and regulations, which extends to all of our Vendors. All AZZ Vendors should adhere to our Vendor Code to help AZZ maintain its ethical and socially responsible culture.

AZZ appreciates that its Vendors are independent entities; however, a Vendor's conduct may reflect upon AZZ and its business reputation. Therefore, AZZ expects its Vendors to adhere to generally accepted standards of business conduct and to carry on their businesses in compliance with all applicable laws, and requires the Vendors' own employees, agents and subcontractors (“**Representatives**”) to do the same. The provisions of this Vendor Code are in addition to those specified in any agreement between a Vendor, its Representatives and AZZ.

Business Practices

Vendors and their Representatives must be aware of the specific standards of conduct and integrity expected by AZZ and must:

- act in a professional manner at all times while acting on AZZ’s behalf or on its premises;
- avoid engaging in or giving the appearance of a conflict of interest in dealing with AZZ employees or customers. A “conflict of interest” occurs when the personal interests of an employee or a third party interfere or appear to interfere with the Company’s interests. Vendors and their Representatives are expected to avoid all situations that would lead a reasonable person to think that they have a conflict of interest, even if there is not an actual conflict;
- not give or promise any gift, or provide any extravagant meals or entertainment to any AZZ employee or other person which is in excess of normal and customary industry practices in the local jurisdiction where you are doing business for the purpose of obtaining an improper or unearned business advantage either for yourself or AZZ;
- not engage in corruption, extortion or embezzlement in any form, offer any bribe, kickback or other incentive to any AZZ employee or representative with the intention of obtaining or retaining business or obtaining and improper business advantage;
- not buy or sell AZZ's stock while in possession of material non-public information about AZZ that is not generally available to the investing public and that could influence an investor's decision to buy or sell stock;
- observe and respect AZZ’s intellectual property ownership rights including, but not limited to, copyrights, trademarks and trade secrets; and use any non-public information provided by AZZ only for

authorized AZZ related business purposes;

- honestly and accurately bill for products and services in accordance with the applicable contract or purchase order. Accounting records must contain reasonable detail, accurately and fairly reflect transactions and expenses and not contain any false or misleading entries; and
- not speak to the media or post public statements about AZZ or its business unless expressly authorized to do so in writing by a senior officer of AZZ.

Legal and Regulatory Compliance Practices

Vendors must comply with all laws and regulatory requirements applicable to their businesses, and require that their Representatives do the same. Vendors and their Representatives must:

- create, retain and dispose of business records in full compliance with all legal, contractual and regulatory requirements;
- comply with applicable environmental, health and safety laws and regulations, including having, maintaining and operating in compliance with all permits, licenses, registrations and restrictions required;
- comply with U.S and international anti-corruption laws and regulations of the countries in which it operates (such as the United States Foreign Corrupt Practices Act, Criminal Law of the People's Republic of China, and Brazil's Clean Company Act 2014, etc.), and not make any direct or indirect payment, offer or promise of money or provide anything of value to any foreign official with the intention of obtaining or retaining business or obtaining an improper business advantage;
- not offer or make any direct or indirect payment, offer or promise to any person for the purpose of improperly obtaining or retaining business;
- comply with applicable trade control and anti-boycott laws, as well as all export, re-export and import requirements governing AZZ's products; and
- comply with antitrust and fair competition laws that govern the jurisdictions in which you are conducting business.

Employment Practices

Vendors are expected to share AZZ's commitment to safety, human rights and equal opportunity in the workplace. Vendors must conduct their employment practices in full compliance with all applicable laws and regulations in all of their U.S. and global locations, and shall require that their Representatives do the same. Vendors and their Representatives must:

- carry on their businesses without unlawful discrimination, treat each employee with dignity and respect, maintain workplaces free from sexual or other harassment and prohibit corporal punishment, mental, physical or verbal abuse of employees;
- provide safe and healthy work environments and fully comply with all applicable health, safety and environmental laws, regulations and practices and have procedures in place for handling emergencies such as fires and natural disasters;

- must pursue ways to conserve natural resources and energy, reduce waste and the use of hazardous substances, and minimize adverse impacts on the environment;
- prohibit the use, possession, distribution or sale of illegal drugs while on AZZ property or on AZZ-related business;
- respect the right of workers to freedom of association and collective bargaining as permitted by applicable laws and regulations and to not intimidate or harass any worker who participates in such associations;
- not permit or require employees to exceed the maximum working hours set by the applicable government authority and by the International Labour Organization's (ILO) fundamental labor rights and principles;
- not use involuntary or forced labor, such as indentured labor, bonded labor, prison labor or engage in any form of human trafficking and slavery;
- comply with all applicable minimum working age laws and not utilize child labor in any event; and
- comply with all applicable laws governing compensation, overtime, minimum wage, working conditions, working hours and benefits as mandated by each jurisdiction in which each Vendor conducts business and has employees. AZZ expects its Vendors to provide compensation and benefits aimed to provide its employees with an adequate standard of living through paying its employees for employee's fair and competitive compensation and benefits that also support equal pay for work of equal value.

Vendor Oversight

AZZ expects the Vendor to take reasonable steps to ensure that this Vendor Code is appropriately communicated to all of its Representatives. Vendor should maintain documentation to show receipt and acknowledgment with AZZ's Vendor Code. Vendor recognizes that AZZ may periodically engage in monitoring activities to assess compliance with this Vendor Code, including on-site inspection of facilities. Vendor recognizes that it is solely responsible for compliance with this Vendor Code by its Representatives.

Reporting of Questionable Behavior or Suspected Violations

Vendors may report any suspected compliance or ethics violations related to services being provided to AZZ by contacting the AZZ Alertline. The AZZ Alertline may be accessed 24 hours a day, 7 days a week toll-free at 1 (855) 268-6428 or via the website at <https://azz.alertline.com>, or you may write to the Chief Legal Officer, AZZ Inc., 3100 West 7th Street, Suite 500, Fort Worth, TX 76107.

Suspected misconduct may be reported anonymously on the AZZ Alertline. The identity of any person asking questions, raising concerns or reporting suspected misconduct will be safeguarded to the extent reasonably possible.

AZZ will not tolerate any retribution or retaliation taken against any individual who has, in good faith, raised concerns or sought out advice, or who has reported questionable behavior or a possible violation of the Vendor Code.