



**DAYTON  
PHOENIX  
GROUP**

engineered to move

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## **Dayton-Phoenix Group, Inc. Product Compliance Policy**

Dayton-Phoenix Group, Inc. ("DPG") values high integrity and ethical standards and requires its Business Partners to comply with all applicable economic sanctions, export control, and anti-boycott laws, regulations, orders, directives, designations, licenses, and decisions. As such, Business Partners must implement effective internal controls to minimize the risk of breaching such laws, and to minimize the risk of causing DPG to breach such laws, particularly where their work involves international financial transfers or cross-border supply or purchase of products, technologies, or services.

### **Our Policy:**

DPG recognizes its responsibility as a member of the global community to contribute to the maintenance of a healthy environment and protect human rights. DPG will abide by the regulations and policies set forth for the following: RoHS/ELV, REACH, Persistent Organic Pollutants (POPs), Prop 65, Conflict Minerals, US EPA Toxic Substance Control Act (TSCA), and Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) based on the information provided from its supply chain.

### **Our Commitment:**

1. Support the aims and objectives of the U.S. legislation, the European Parliament and of the Council of the European Union, State of California on the use of the substances involved with the regulations and policies previously mentioned.
2. For the products which DPG contracts to manufacture, it does not knowingly procure specified materials that are non-compliant.
3. For the items that DPG believes it "contracts to manufacture", it will ask its suppliers to undertake reasonable due diligence with their supply chains to assure that specified materials are being sourced only from compliant facilities, mines, and smelters or from facilities, mines, and smelters which have been certified by an independent third party to meet the standards set forth in the regulations and policies.

### **Our Expectations for Suppliers:**

Suppliers will be required to provide written evidence of due diligence documentation upon request. The aim is to ensure that only compliant materials and components are used in products that DPG contracts to manufacture. If DPG discovers the use of these non-compliant substances used in any material, parts or components procured, it will take appropriate actions to transition product to be compliant.