



ESAB Corporation

CODE OF CONDUCT FOR BUSINESS PARTNERS

This Code of Conduct for Business Partners (“Code”) sets out the expectations and standards of ESAB Corporation and its operating subsidiaries, affiliates and divisions (“ESAB”) that apply to any agents, distributors, dealers, contractors, intermediaries, joint venture partners, suppliers and other business partners doing business with ESAB (“Business Partners”).

Statement of Principles

As a company with global operations, ESAB is committed to following the laws and regulations applicable to the locations in which it operates. ESAB also seeks to exceed legal requirements and to conduct all activities at the highest level of responsible and ethical behavior. ESAB’s integrity is maintained by operating its worldwide business in accordance with these standards.

Accordingly, ESAB expects each of its Business Partners to operate and act in full compliance with this Code and all applicable laws and regulations. Simply stated, we will obey the law and act ethically and expect our Business Partners to do the same.

Responsibility of Business Partners

The following highlights ESAB’s expectations of its Business Partners:

Applicable Laws and Regulations

- Comply with all applicable national, state or regional, and local laws and regulations in the countries in which they operate

Antitrust and Competition Laws

- Comply with all applicable antitrust and competition laws which prohibit agreements or actions that unreasonably restrain trade, are deceptive or misleading, or unreasonably reduce competition without providing beneficial effects to consumers

Anti-corruption, Gifts and Gratuities

- Enter into all business relationships honestly and ethically
- Bribery, kickbacks or other improper payments, direct or indirect, to any person, or receipt from any person, to obtain a contract, some other commercial benefit or government action is strictly prohibited

Global Trade Compliance and Anti-Boycott

- Never seek to mislead or improperly or illegally avoid the payment of import duties, taxes and fees, and never engage in activities meant to evade the legal requirements of international traffic and trade
- Know relevant third- and counterparties and not engage in or facilitate business with entities or any other individuals specifically prohibited by law

- Be aware of, and comply with, restrictions on dealing with entities and individuals located in countries that are subject to trade embargoes or economic sanctions imposed by the United States and other countries where they conduct business
- Never make or cooperate with requests to provide information or take actions, such as refusing to do business, that further a non-U.S. boycott

Labor and Employment

- Comply with all applicable wage and hour laws and regulations and provide legally mandated benefits
- Never employ workers younger than the local, legally required minimum age, and never use forced, bonded, indentured or slave labor
- Treat each employee with dignity and respect, and not engage in or permit corporal punishment, threats of violence, or other forms of harassment whether based on gender, color, ethnicity, sexual orientation, physical or mental disability, age, pregnancy, religion, veteran status, national origin or any other legally protected status

Health, Safety and Environment

- Provide a safe work environment and conduct business in a manner consistent with all applicable safety standards, including governmental requirements, operations- and facility-specific safety requirements
- Maintain procedures for handling emergencies such as fire, spills and natural disasters
- Identify and respond to any public health impacts of operations and use of applicable products
- Maintain an effective environmental policy and conduct operations in a way that minimizes any adverse impacts on the environment
- Obtain and keep current all required environmental permits and meet all applicable environmental rules, regulations and laws

Conflicts of Interest

- Avoid conflicts of interest with respect to ESAB businesses and declare any potential conflicts of interest

Confidentiality

- Act with integrity and lawfully in the proper handling of competitive data, proprietary and confidential information, and other intellectual property

Supporting the Code

- Hold employees and, to the extent they supply goods or services for ultimate sale to or use by ESAB, suppliers and other third parties to these same standards
- Adopt or establish a management system that supports the content of this Code and drive continuous improvement in these areas

Monitoring and Compliance

Neither ESAB nor any of its group companies or authorized agents assumes any duty to monitor or ensure compliance with this Code, and each Business Partner understands that the Business Partner is solely responsible for full compliance.

ESAB reserves the right to assess compliance to these requirements and will expect its Business Partners to correct non-compliance issues identified during assessments. Upon request, Business Partners will provide ESAB with information to enable it to assess conformance with this Code.

If a Business Partner refuses or is unable to correct the non-compliance to our satisfaction, however, ESAB or one of its group companies may terminate the relationship. ESAB reserves the right to amend this Code and any of the above listed responsibilities.

ESAB's Commitment to Business Partners

ESAB holds all of its associates, officers, and directors, when they are acting in connection with their official ESAB duties, to the policies set forth by the ESAB Code of Business Conduct, available on ESAB's website at <https://investors.esabcorporation.com/governance/governance-documents>.

Resolving Code or Ethics Issues

Employees of Business Partners are encouraged to work through their own company to resolve internal ethics issues. Business Partners should, however, promptly report violations of this Code or any unethical behavior by going to the ESAB Corporation ethics website at <http://esab.ethicspoint.com/> or contacting the ESAB Corporation Ethics Hotline at 1-844-486-1644 (for Business Partners outside of the United States and Canada, please use the hotline number associated with your location as specified in the ESAB Code of Business Conduct).

Date Effective	April 4, 2022
Version	1