

The Specialty Manufacturing Environmental, Social, Governance (ESG) Policy:

The Specialty Manufacturing Co. (Specialty) requires that all employees and officers comply with all laws, rules and regulations applicable to the Company wherever it does business. Employees and officers are expected to be familiar with the laws, rules and regulations applicable to the business and also of which the Company provides written notice.

Applicable laws, rules and regulations include, but are not limited to, the following:

- Fair Labor Standards
- Environmental, Health and Safety
- OSHA
- Prohibition of forced labor, human trafficking and child labor

We certify that we:

- Only employ individuals who are authorized to work in the United States
- Use recruiters that comply with Fair Labor Standards

Employees and officers are responsible for promptly reporting any violation of applicable laws, rules or regulation to their supervisor or other member of management. While it is Specialty's desire to address matters internally, nothing in this policy discourages employees and officers from reporting illegal activity to the appropriate regulatory authority. Specialty will not retaliate or discriminate against an employee because they in good faith report any such violation.

Environmental – Climate Impact & Product Stewardship

The Specialty Manufacturing Environmental Policy:

Specialty is committed to reducing its impact on the environment. We will strive to improve our environmental performance over time and to initiate additional projects and activities that will further reduce our impacts on the environment. Our commitment to the environment extends to our customers, our staff, and the community in which we operate.

Our commitment is to:

- Comply with all applicable environmental regulations;
- Prevent pollution whenever possible;
- Train our employees on environmental awareness and empower them to contribute and participate; and
- Communicate our environmental commitment and efforts to our customers, staff, and our Community.

Climate Impact:

Specialty has identified and assessed the impacts, risks and opportunities related to climate by assessing our carbon footprint. Although we publicly share this information upon request, we do not report this data through any regulatory agency. We have not set corporate targets to reduce greenhouse gases although we do have active improvement projects that would impact this number. Currently, Specialty has a solar array that accounts for 25% of our energy consumption.

Social – Human Trafficking and Slavery

Specialty is a small manufacturing company that employs around 225 people. We only employ people over the age of 18, and documents are checked to prove the employee's age prior to their start of employment with Specialty. Due to state and federal employment law, as well as internal human resource practices. Specialty does not:

- Employ individuals who are not authorized to work in the United States
- Utilize raw materials sourced from or do business with any sanctioned countries
- Source from organizations that use forced or child labor
- Use forced or child labor
- Engage in any type of human trafficking
- Interfere with employee's right to join trade unions
- Interfere with employees' right to peacefully assemble
- Discriminate hiring based on race, sex, age, HIV/AIDS status, disability, nationality, sexual orientation
- Pay our employees below the state and federal minimum wage standards
- Require employees to engage in commercial sexual activity
- Provide employee housing.

Specialty would not interfere with any employee wishing to make a complaint about any of the above-mentioned hiring practices to any regulatory agency. Specialty will not retaliate or discriminate against an employee because they in good faith report any such incident.

Governance – Organizational Commitment

Specialty has an employee code of conduct that each employee must abide by that addresses anti-bribery and anti-corruption. This is included in Specialty's employee manual.

THE SPECIALTY MFG. CO.

Flow Control Products • Pool Maintenance Products • Contract Manufacturing • Plastic Injection Molding • Precision Machining

Specialty abides by all applicable state and federal trade laws. Specialty and its owners have never been debarred from doing business in any nation/jurisdiction, and have never been placed on a watchlist or sanctions list. Specialty does not do business in or with a nation sanctioned by the United States government.

Specialty and its officers have never been prosecuted or convicted of a crime involving money laundering, fraud, or corrupt practices. Employees are asked at the time of their hire if they have any conflicts of interest to disclose. Any conflicts of interest would be handled by Specialty's management team. Specialty conducts its business in full compliance with:

- anti-trust and fair competition laws
- Federal and state whistleblower and anti-retaliation laws.