

Miller Broach / Miller Production and Machining Sustainability Policy

Policy Statement:

This policy establishes the Miller Broach / Miller Production and Machining's expectations with respect to environmental responsibility and sustainability. At Miller Broach and Miller Production and Machining, we believe that precision manufacturing and environmental stewardship go hand-in-hand. Our commitment to sustainability is rooted in our "customer-driven" approach, ensuring that we provide the highest quality products while minimizing our operational footprint.

1.0 Purpose:

To set a standard for Miller Broach / Miller Production and Machining, our employees, suppliers and contractors on Sustainability.

Policy:

Miller Broach and Miller Production and Machining (hereinafter referred to as "the Company") is committed to conducting its business ethically, responsibly, and sustainably throughout its operations in Capac and Port Huron MI, and its entire supply chain. This policy outlines our core principles and the standards we expect our employees and suppliers to uphold, ensuring the preservation of the natural environment and the betterment of society.

2.0 Responsibilities:

Management Team:

- Commitment to Policies:
 - All employees.
- Responsible for flow down to Suppliers and Contractors.
 - Purchaser.
- Responsible for reviewing information for completeness.
 - Business Manager

3.0 Objectives:

Environmental Stewardship and Land Use

The Company is dedicated to minimizing its environmental footprint and conserving natural resources.

- **Biodiversity, Land Use, Deforestation, and Soil Quality:** We are committed to the conservation and sustainable management of land and forests, striving to avoid deforestation and promote the preservation of natural ecosystems and biodiversity. We will strive to maintain soil quality in and around our operations and favor suppliers who do the same. We conduct periodic environmental assessments to identify opportunities for pollution prevention and to ensure our facility footprint does not interfere with critical wildlife habitats.

- **Land, Forest, and Water Rights and Forced Eviction:** We respect the land, forest, and water rights of communities in the regions where we operate and throughout our supply chain. We explicitly avoid and prohibit any form of forced eviction and the deprivation of land, forests, and waters in the acquisition, development, or other use of land, forests, and waters. We will conduct due diligence to ensure our operations do not contribute to such practices. We strive to minimize water consumption and support efforts to maintain water quality.
- **Reduced Greenhouse Gas Emission:** Target 61-66% reduction by 2035 and net-zero by 2050. Targeting direct emissions (Scope 1), purchased energy (Scope 2), and value chain emissions (Scope 3).
- **Noise Emissions:** We will take all reasonable and necessary actions to manage and minimize noise emissions from our operations to prevent compromising employees, surrounding community and local wildlife.
 - **Regulatory Compliance:** We comply with all local Capac ordinances and MIOSHA standards regarding industrial noise. Permissible Exposure Limit (PEL) at a 90 dBA time-weighted average (TWA) for an 8-hour day, with an "Action Level" of 85 dBA requiring a hearing conservation program. Exposure times decrease as volume increases, and peak impulse noise must never exceed 140 dB.
 - **Acoustic Monitoring:** For equipment generating sound pressure levels greater than 85 dB(A), we provide detailed user documentation and implement noise-reduction measures, such as acoustic enclosures or vibration dampening as appropriate.
 - **Worker Safety:** Hearing protection is mandatory in high-noise areas, and we perform regular maintenance on broaching and machining equipment to prevent excessive noise caused by mechanical wear.
- **Animal Welfare:** We expect our suppliers to respect animal welfare and adhere to all applicable laws and regulations concerning the ethical treatment of animals in their operations and supply chains.

Business Ethics and Responsible Conduct

The Company is committed to the highest standards of integrity, transparency, and compliance with all applicable laws and regulations.

- **Financial Responsibility (Accurate Records):** We require accurate and transparent financial record-keeping in compliance with all relevant laws and accounting principles. All business dealings must be clearly and fairly documented to ensure accountability.
- **Fair Competition and Anti-Trust:** We are committed to free and fair competition and will comply with all applicable anti-trust and competition laws. We prohibit any anti-competitive agreements or practices.
- **Counterfeit Parts:** We have a zero-tolerance policy for counterfeit parts or materials. We will implement procedures to ensure the authenticity of all sourced components and work to prevent the introduction of counterfeit items into our supply chain.

- **Intellectual Property:** We respect the intellectual property rights of others and expect our suppliers to do the same. The misuse, unauthorized sharing, or infringement of patents, trademarks, copyrights, or trade secrets is strictly prohibited.
 - **Internal Protection:** All proprietary machining processes, tool designs, and custom software developed at our Capac facilities are protected under U.S. Patent and Trademark law as applicable.
 - **Confidentiality:** Employees, customers and contractors are required to sign Non-Disclosure Agreements (NDAs) to safeguard trade secrets as applicable.
 - **Client Assets:** We provide full-service protection for client-provided IP, ensuring that custom broaching packages and aluminum extrusion designs are used exclusively for the designated project.
 - **Infringement Reporting:** We maintain a zero-tolerance policy for IP theft and encourage the reporting of potential infringements to our legal team.
- **Export Controls and Economic Sanctions:** We will comply with all applicable national and international export controls and economic sanctions or embargoes. This includes restrictions on commercial and financial transactions with sanctioned countries, entities, or individuals.

Human Rights and Security

The Company operates consistently with the UN Guiding Principles on Business and Human Rights and the Universal Declaration on Human Rights (See Human Rights Policy).

- **Use of Private or Public Security Forces:** We ensure that any private or public security force engaged by the Company or our suppliers adhere to applicable law and international norms, respecting human rights and not using force in a manner that violates these rights. Security personnel must be appropriately trained and act with restraint and proportionality.

Supply Chain Management

We depend on our suppliers to uphold these standards and foster sustainable practices throughout the value chain.

- **Binding Requirements for Tier-1 Suppliers to Pass on Standards along the Supply Chain:** We require all Tier-1 suppliers to accept and comply with this Sustainability Policy as a prerequisite for doing business with us. Suppliers, in turn, are expected to implement due diligence processes and work with their own suppliers and vendors to ensure these principles are passed on and upheld throughout all tiers of the supply chain. They must communicate our expectations clearly and monitor compliance.

Monitoring and Compliance

- **Reporting:** Track and report on progress toward these environmental commitments as part of annual sustainability reviews.
- **Regulatory Alignment:** Ensure full compliance with relevant local and international environmental laws, including those effective in 2026 regarding waste and resource management.

4.0 Related Documentation

QMS Procedure Sections:

- MB 5.0 Management Responsibility
- MB 7.1 Training & Competency
- MB 8.4 Purchasing
- Appendix A, Quality Records Table

Forms and other documentation:

- UN Guiding Principles on Business and Human Rights (UNGPs).
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.
- MB-MPM Human Rights Policy
- Employee Handbook
- Vendor Contact List
- Vendor Registration Certificates/Letter of Compliance
- Purchase Order w/ Terms and Conditions
- Miller Broach Conflict Minerals Policy
- MB-MPM Conflict & Extended Minerals Policy
- CMRT-EMRT Supplier Email-Letter
- Supplier Intro Letter
- Supplier Sustainability Policy
- SAQ 5.0 Rating Report

5.0 Revision History

This section was originally issued on 01/12/26 at Revision 0. The table below indicates any changes that have been made since the initial release.

Date	Details of Change	Revision
01/31/2026	Added Reduced Greenhouse Gas Emission	1
02/05/2026	Updated Forms and Documentation	2