

Donaldson Company, Inc. and its global subsidiaries and affiliates (“Donaldson”) strongly oppose the use of child, slave and forced labor, and participation in human trafficking by any person or organization, including its suppliers. As a global company, Donaldson is committed to compliance with applicable laws, including California’s Transparency in Supply Chains Act of 2010, the UK Modern Slavery Act and global equivalents.

Donaldson’s Code of Conduct (Code) sets forth our commitment to applying uniformly high standards of ethics and business conduct in every country in which we operate and in every business relationship we have worldwide. We are principally guided in this global economy by the laws of the countries in which we are located or do business. This Code is applicable to our global business activities and includes all employees, Officers, and Directors of Donaldson Company, its business units, affiliates, and subsidiaries, where Donaldson has a majority ownership position or exercises management control. All employees are required to promptly report all known or suspected violations of applicable laws, as well as our Code. Donaldson conducts annual Code training for employees and provides multiple ways for employees to ask for help regarding ethical concerns. Donaldson also maintains a Help Line where employees and others may anonymously report any suspected violation of the Code without fear of retaliation.

Donaldson’s Human Rights Policy, which is published on its website, formalizes our commitment to uphold and respect human rights for all people, including strongly opposing any use of child, slave or forced labor. Donaldson’s Forced Labour Policy, also published on its website, outlines Donaldson’s compliance measures regarding child and forced labor.

In keeping with applicable law and the commitments in our Code, Human Rights Policy, and Forced Labour Policy, we engage in various verification mechanisms of product supply chains to evaluate and address risks of human trafficking and maintain accompanying internal accountability standards. Below is a summary of the various actions we are taking to ensure our supply chain is free from forced labor and other unethical labor practices:

1. [Supplier Sustainability Self-Assessment:](#)

All new raw material suppliers are required to complete our Supplier Sustainability Self-Assessment. This assessment includes a chapter on “Labor & Human Rights,” which contains yes/no questions related to forced labor. The completed assessments are stored in our ERP system along with other onboarding documents.

2. [Supplier Questionnaire:](#)

All new raw material suppliers must also complete our Supplier Questionnaire. This questionnaire features a chapter on “Social Aspects,” which addresses compliance with the Universal Declaration of Human Rights. It includes questions regarding salary and benefits, working hours, child labor, forced labor, and non-discrimination. These documents are also stored in our ERP system as part of the onboarding process.

3. Supplier Code of Conduct & Sustainability Policy:

Our [Supplier Code of Conduct & Sustainability Policy](#) includes comprehensive chapters on labor practices, such as slavery, child labor, and forced labor. Specifically, Chapter IV, titled “Ethical Sourcing,” addresses our stance on forced labor:

[Slavery, Human Trafficking, and Forced Labor](#): Donaldson Company Inc. believes that employment should be voluntary, and terms of employment must comply with applicable laws and regulations. We oppose slavery, human trafficking, and forced labor, and are committed to complying with all applicable laws prohibiting such practices. We expect our suppliers to uphold these standards, adhere to regulations prohibiting slavery, human trafficking, and forced labor, and comply with all relevant local laws in the countries in which they operate.

We seek acceptance of our Supplier Code of Conduct & Sustainability Policy through various methods:

[A. Strategic Supplier Campaign](#): We inquire with all incumbent strategic suppliers. During the FY22 campaign, 80% of our strategic suppliers (by spend) accepted our code or confirmed they have an equivalent.

[B. Supplier Registration Form](#): All new suppliers (both raw and indirect) must complete our Supplier Registration Form, which includes a “Compliance” chapter where they must agree to our Code of Conduct and Purchase Order Terms and Conditions to do business with Donaldson.

[C. Welcome Package](#): The document is automatically sent to all new suppliers as part of the welcome package. It clearly states that we expect our suppliers to impose similar requirements on their own supply base, implementing their own written code of conduct and flowing down the principles of our Supplier Code of Conduct & Sustainability Policy to their own suppliers.

[D. Purchase Orders and Supplier Contracts](#): All our Purchase Orders and Supplier Contracts reference our Global Purchase Order Terms and Conditions. This document is also included in the onboarding package for all new suppliers and contains a chapter on compliance with laws: Compliance with Laws: Suppliers agree to comply with all applicable laws related to their business, interstate commerce, import and export controls, and the manufacture and production of goods. This includes compliance with antitrust and trade practice laws, anti-corruption and anti-bribery laws, labor laws, environmental laws, and other relevant federal, state, and local laws, rules, and regulations.

If a supplier submits any of these reports, checks, or audits with negative results, or refuses to abide by our policies, it will trigger further investigation. This may potentially lead to the immediate disqualification of the supplier from Donaldson’s supply base.

4. Specific Inquiries:

In FY24, we conducted a specific inquiry with our APAC suppliers, obtaining confirmation that their goods and services do not originate from regions that pose higher risk of forced labor. We had our suppliers sign attestations.

5. 3rd Party Software

In FY25, we employed third-party software called Kharon. Kharon checks Tier 1, 2, and 3 transactions and their origins, enhancing our ability to trace and verify the sources of our supply chain.

These measures ensure that Donaldson Company Inc. maintains rigorous standards to prevent forced labor within our supply chain, in line with our commitment to ethical business practices and compliance with global labor laws.

Approved on behalf of:

Donaldson Company, Inc

**Donaldson Filtration (GB) Ltd.
Donaldson Filter Components Ltd.**



Darcy DeVinke
Chief Human Resources Officer



Christine Cook
Legal Representative

Issue Date: 21st April 2025