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Teutopolis, IL 62467  
Phone #: 217-857-7100

**BILL S-211 An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff**

**Modern Slavery Statement for the Financial Year ended 12/31/23**

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff. This statement outlines the approach and initiatives by Stevens Industries Inc. to identify and address the risks of forced labour and child labour in its business operations and supply chains during the financial year commencing 1/1/23 and ending 12/31/23.

#### **Business Structure**

Stevens Industries Inc. was established in 1956. It operates as an S Corporation under the business name Stevens Industries Inc. with its head office and manufacturing plant/warehouse in Teutopolis IL and a secondary manufacturing plant/warehouse in nearby Effingham IL. Stevens Industries Inc's operations and company culture are overseen by a board of directors, President, CFO, Operations Managers and Director of Human Resources. In 1998, Stevens Industries Inc. transferred ownership to an Employee Stock Ownership Plan (ESOP) and its approximately 500 employee owners have an active Voice in the company.

A documented, communicated, trained structure of ethics and business conduct is core to the Stevens Industries Inc. culture. A copy of the company policies and mission statement which is also posted on our website are attached.

#### **Supply Chain**

Stevens Industries Inc. sources raw materials for the manufacture of our finished products which include commercial casework, architectural millwork, childcare and educational furniture, and laminated wood panels. Our material sources include companies in the US, Canada, Columbia, Germany, UK, Italy, Spain, Thailand, China, Brazil. Suppliers and contractors are selected as part of a master attributes list and then monitored based on our global citizenship guidelines.

Raw materials are shipped to our plants in Teutopolis, IL and Effingham, IL for production, assembly and packaging. Our products are sold through distributors, dealers, and direct to consumers. We partner with many schools, hospitals, and childcare companies which are also supportive of the fight against forced & child labour.

#### **Risks in Supply Chain**

Stevens Industries Inc. strives to create a positive work environment for all employees, with respect for differences in age; ethnicity; gender; gender identity; nationality; physical, mental and developmental abilities; race; religion; sexual orientation; skin color and socio-economic status. As a manufacturer of childcare and educational furniture, ensuring that our products do not support forced or child labour in any way is a significant concern to us as well as to our customers.

As part of our risk assessment, we initiate the process of vendor selection by confirming that vendors are aligned with our goals of protecting the human rights of all people. We monitor that adherence based on our global citizenship guidelines with a primary focus on those in areas of greatest concern.

Internally, our Human Resources Department documents and monitors the age of our approximate 500 employees for strict adherence.

#### Actions Taken

See the attached documentation of the steps Stevens Industries Inc has taken to formulate, document, communicate and train our company stance on all aspects of our company culture. This documentation was developed at length and signed by the President of Stevens Industries Inc. New employee onboarding includes training of this information with required signature of understanding and acceptance by new employees.

#### Risk Assessment

Monitoring these processes is important to the success of our goals. Suppliers and contractors are monitored based on global citizenship guidelines on an annual basis as part of contractual price reviews.

#### Remediation

No remediation has been required at this time to correct issues during the 2023 financial year. Stevens Industries Inc. has been successful in sourcing suppliers and contractors who share our position on human rights.

#### Training

New employee onboarding includes training of our human rights stance with required signature of understanding and acceptance by new employees. Each new employee attends sessions in person as well as on-line training prior to beginning their position with Stevens Industries Inc. Our Director of Human Resources coordinates annual updates and refreshers of company policies with in person and on-line training.

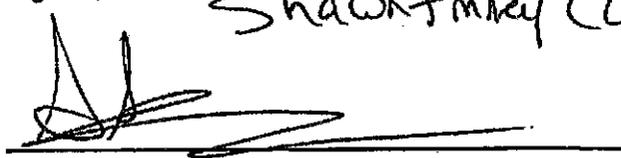
#### Ethical Assessment

No KPIs were in place in 2023. Plans for 2024 include documentation of number of suppliers contacted and number of employees trained. Review of this data will clarify additional KPIs to include for future analysis.

This statement is made pursuant to Bill S-211, An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act for the financial year ending 12/31/2023. It has been issued on behalf of Stevens Industries Inc. and approved by Stevens Industries Inc.'s board of directors.

Signed,

Shawn Finney (CFO, Secretary of board)



(member of board)

5-31-2024 (date)



<b>Original Issue Date</b> 04/30/84	<b>Revision Number</b> 24	<b>Revision Date</b> 04/20/2020
<b>Subject: Code of Ethics and Business Conduct</b>		

## **VISION STATEMENT**

Stevens Industries will be the highest perceived value company.

## **MISSION**

Stevens Industries will be a world class manufacturer of wood and laminated products.

## **VALUES**

- We shall emphasize attention to detail and simplicity in all our processes.
- We shall relentlessly pursue reduction of customer lead times.
- We shall provide new products and services reflecting greatest value and innovation in techniques and design.
- We shall maintain a lean, responsive, competitive organization.
- We shall strive for fair profits and sustain controlled growth through proper business planning.
- We shall maintain a friendly, clean, and safe work environment.
- We shall be responsible members of our community.
- We shall conform to sound environmental practices.

## **QUALITY POLICY**

We shall consistently provide products and services conforming to internal and external customer requirements, competitively priced, and on time.

## **BUILDING TRUST AND CREDIBILITY**

The success of our business is dependent on the trust and confidence we earn from our employees, customers, suppliers and ESOP shareholders. We gain credibility by adhering to our commitments, displaying honesty and integrity and reaching company goals solely through honorable conduct. It is easy to say what we must do, but the proof is in our *actions*. Ultimately, we will be judged on what we do.

When considering any action, it is wise to ask: Will this build trust and credibility for Stevens? Will it help create a working environment in which Stevens can succeed over the long term? Is the commitment I am making one I can follow through with? The only way we will maximize trust and credibility is by answering "yes" to those questions and by working every day to build our trust and credibility.

We all deserve to work in an environment where we are treated with dignity and respect. Stevens is committed to creating such an environment because it brings out the full potential in each of us, which, in turn, contributes directly to our business success. We cannot afford to let anyone's talents go to waste.

Stevens is an equal employment/affirmative action employer and is committed to providing a workplace that is free of discrimination of all types and from abusive, offensive or harassing behavior. Any employee who feels harassed or discriminated against should report the incident to his or her manager or to human resources.

## **HUMAN RIGHTS POLICY STATEMENT**

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Stevens is committed to conducting business in an ethical and responsible manner. We respect and support international principles aimed at protecting and promoting human rights. In our own operations, Stevens seeks to operate in compliance with all applicable laws wherever we do business.

While governments have the primary responsibility for protecting and upholding the human rights of their citizens, Stevens recognizes its responsibility to respect human rights in its operations. In addition, we recognize that we have an opportunity to promote human rights where we can make a positive contribution.

## **DIVERSITY AND INCLUSION**

We strive to foster safe, inclusive and respectful workplaces wherever we do business. Stevens' workplace policies and practices include commitments to non-discrimination and freedom from harassment and require that the company refrain from knowingly entering into relationships that, directly or indirectly, expose team members to undue health and safety risks, or that use child, prison or forced labor, or other similarly exploitative practices.

## **HUMAN RIGHTS WITHIN OUR DIRECT SPHERE OF INFLUENCE**

We also strive to foster safe, inclusive and respectful workplaces. We expect the same commitment from business associates and vendors.

## **NON-DISCRIMINATION AND HARASSMENT**

It is the policy of Stevens to attract and retain the best qualified people available without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, physical or mental disability or veteran status. People are employed based on the principle of equal opportunity. Our nondiscrimination policy applies to applicants as well as employees and covers all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation and benefits. Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of this policy. Stevens will make its decisions regarding present and future employees based on objective criteria. Stevens respects cultural and individual diversity and promotes inclusiveness. One aspect of safeguarding the integrity of each team member is to ensure that harassment in any form does not

occur and, if it does occur, to ensure that adequate procedures are readily available to deal with the problem and prevent recurrence.

## **WORK ENVIRONMENT AND COMPENSATION**

We are committed to promoting a work environment that fosters communication, productivity, creativity, teamwork and employee engagement. We seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location where the work is being performed.

## **HEALTH AND SAFETY**

Stevens' provides its team members with a safe and hygienic working environment and working conditions. Stevens will take appropriate measures to continuously improve safety and health aspects within its facilities, including the provision of personal protective equipment when and where necessary. Working conditions should allow for safe working practices and support the occupational health and well-being of team members. We maintain a protocol of continuous improvement of our health and safety performance.

### **Create a Culture of Open and Honest Communication**

At Stevens everyone should feel comfortable to speak his or her mind, particularly with respect to ethics concerns. Managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We all benefit tremendously when employees exercise their power to prevent mistakes or wrongdoing by asking the right questions at the right times.

Stevens will investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company will take appropriate action. We will not tolerate retaliation against employees who raise genuine ethics concerns in good faith.

### **Whistleblower Policy and Procedures**

Stevens is committed to conducting business in accordance with the highest ethical standards and complying with all applicable securities laws and regulations, accounting standards, accounting controls and audit practices. To that end, Stevens Whistleblower Policy and Procedures establishes several ways that an employee may submit a good faith report or questionable accounting or auditing matters or possible violations of the federal securities laws related to the company. An employee may submit a report to the company's CFO and Director of Human Resources. Any employee wishing to submit a report shall be free to do so without fear of dismissal or retaliation. Action will be taken to review the report and take action as needed including but not limited to notifying other concerned parties, consulting with Stevens Board of Directors, and undertaking an investigation. Neither Stevens nor any employee or agent of Stevens can discharge, demote, or in any manner discriminate against any employee with regard to his or her employment as a result of a report. Stevens strictly prohibits such retaliatory action and will review promptly any complaint of retaliation or other similar behavior. Complaints and investigations will be handled in a confidential manner, consistent with any corrective action that needs to be taken by Stevens.

## **Set Tone at the Top**

Management has the added responsibility for demonstrating, through their actions, the importance of this Code and Stevens commitment to it. In any business, ethical behavior does not simply happen; it is the product of clear and direct communication of behavioral expectations, modeled from the top and demonstrated by example. Again, ultimately, our actions are what matters.

To make our Code work across the Stevens organization, managers must be responsible for promptly addressing ethical questions or concerns raised by employees and for taking the appropriate steps to deal with such issues. Managers should not consider employees' ethics concerns as threats or challenges to their authority, but rather as another encouraged form of business communication. At Stevens, we want the ethics dialogue to become a natural part of daily work.

## **Uphold the Law**

Stevens' commitment to integrity begins with complying with laws, rules and regulations where we do business. Further, each of us must have an understanding of the company policies, laws, rules and regulations that apply to our specific roles. If we are unsure of whether a contemplated action is permitted by law or Stevens policy, we should seek the advice from the resource expert. We are responsible for preventing violations of law and for speaking up if we see possible violations. Because of the nature of our business, some legal requirements warrant specific mention here.

### **Fair Competition/ Proprietary Information**

Stevens prides itself as a leader in the marketplace by innovating, performing at the highest levels and competing vigorously. It is critical to our business and our reputation that we compete fairly. This means:

We comply with fair competition- or "antitrust"- laws that promote market place fairness. These laws prohibit restraints on trade, including agreements among competitors to fix prices, to manipulate the volume or availability of products, to allocate territories, markets or products, or to boycott particular suppliers or customers. In many circumstances, it is also illegal to offer discriminatory pricing to competing customers. Because penalties for anticompetitive conduct can be very severe, including huge individual and corporate fines and prison sentences, and because the rules in this area are so complex, the Stevens Legal Department must assist with all antitrust issues.

We gather and use competitors' information legally and ethically. We can seek out and rely on publicly available, non-confidential information about competitors' business practices. It is improper to use others' proprietary competitive information.

### ***Proprietary Information***

It is important that we respect the property rights of others. We will not acquire or seek to acquire improper means of a competitor's trade secrets or other proprietary or confidential information. We will not engage in unauthorized use, copying, distribution or alteration of software or other intellectual property.

### ***Selective Disclosure***

We will not selectively disclose (whether in one-on-one or small discussions, meetings, presentations, proposals or otherwise) any material nonpublic information with respect to Stevens, its securities, business operations, plans, financial condition, results of operations or any development plan. We should be particularly vigilant when making presentations or proposals to customers to ensure that our presentations do not contain material nonpublic information.

### **Abiding by Global Trade Laws**

As a global company and a supplier to other global companies, Stevens transfer goods, services and technologies to countries all over the world. The U.S. export laws regulate where and with whom we can do business and where we may transfer goods, services, and technologies. Stevens' business transactions are subject to various trade controls and laws that regulate exports including government-imposed export controls, trade restrictions, trade embargoes, legal economic sanction and boycotts. Our ability to export product, services and technologies is a privilege, not a right, and the U.S. government can revoke that privilege in event of a violation. Stevens will endeavor to stay current as laws change to revise and update procedure to comply.

### **The Rights of Children**

The well-being of children is important to Stevens. We support efforts combatting the exploitation of children and therefore prohibit any use of child labor. Suppliers and contractors are selected as part of a master attributes list and then monitored based on our global citizenship guidelines. Stevens opposes exploitation of children.

Stevens will act in such a way that none of its operations knowingly contribute to human rights violations such as the exploitation of children. Employees who believe there may have been a violation of policy should report this to their group manager or human resource department. No retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible policy violations. Stevens may conduct assessments, as needed, to measure compliance to policies and expectations regarding the development of an inclusive and respectful culture.

### **Anti-bribery**

Stevens does not accept bribes or facilitation payments in any form.

### **Forced or bonded labor**

Stevens does not employ or accept any form of forced or bonded labor, prisoners or illegal workers, and expects its business partners to do the same. Stevens acknowledges that means to force people to work can include a deposit of payment or demand to deposit identity documentation or other personal belongings, all of which is prohibited. If business partners employ foreign workers on a contract basis, they must not be required to remain in employment against their will, and they shall further have the same rights as the local workers. The employer will pay for commissions and recruitment agency fees in connection with the employment where applicable.

All workers shall have the right to leave their workplace and accommodation (if provided) freely during the hours when they are not working.

### **Alcohol and/or drug abuse**

Stevens works proactively to remove any workplace hazards. Individuals producing products or providing services for Stevens should not be on company premises or in the workplace if they are under the influence of, or adversely affected by, alcohol, to the extent this impairs the individual's ability to perform his or her work duties. Stevens has zero tolerance on drugs, and does not allow individuals producing products or providing services for Stevens to be on company premises or in the workplace if they are under the influence of drugs.

### **Consumer Interest**

Stevens requires that applicable health and safety requirements are met for its products and services, and our business partners shall take this into account when producing goods or providing services for Stevens.

### **Responsible sourcing of minerals**

Stevens is committed to comply with relevant laws and regulations requiring disclosure of the use of conflict minerals. Conflict minerals are minerals from high risk and conflict-affected areas that have directly or indirectly contributed to financing of armed groups, where some groups are believed to be responsible for serious human rights violations. Goods provided to Stevens shall be in compliance with relevant laws and regulations regarding conflict minerals.

### **Conflicts of Interest**

We must avoid any relationship or activity that might impair, or even appear to impair, our ability to make objective and fair decisions when performing our jobs. At times, we may be faced with situations where the business actions we take on behalf of Stevens may conflict with our own personal or family interests. We owe a duty to Stevens to advance its legitimate interests when the opportunity to do so arises. We must never use Stevens property or information for personal gain or personally take for ourselves any opportunity that is discovered through our position with Stevens.

Here are some other ways in which conflicts of interest could arise:

- Being employed (you or a close family member) by, or acting as a consultant to, a competitor or potential competitor, supplier or contractor, regardless of the nature of the employment, while you are employed with Stevens.
- Hiring or supervising family members or closely related persons.
- Serving as a board member for an outside commercial company or organization.
- Owning or having a substantial interest in a competitor, supplier or contractor.
- Having a personal interest, financial interest or potential gain in any Stevens transaction.
- Placing company business with a firm owned or controlled by a Stevens employee or his or her family.
- Accepting gifts, discounts, favors or services from a customer/potential customer, competitor or supplier, unless equally available to all Stevens employees.

- Stock trading based on inside information from Stevens or from our customers and/or suppliers.

Determining whether a conflict of interest exists is not always easy to do. Employees with a conflict of interest question should seek advice from management. Before engaging in any activity, transaction or relationship that might give rise to a conflict of interest, employees must seek review from their managers or the HR department.

### ***Gifts, Gratuities and Business Courtesies***

Stevens is committed to competing solely on the merit of our products and services. We should avoid any actions that create a perception that favorable treatment of outside entities by Stevens was sought, received or given in exchange for personal business courtesies. Business courtesies include gifts, gratuities, meals, refreshments, entertainment or other benefits from persons or companies with whom Stevens does or may do business. We will neither give nor accept business courtesies that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulation or policies of Stevens or customers, or would cause embarrassment or reflect negatively on Stevens' reputation.

### ***Accepting Business Courtesies***

Most business courtesies offered to us in the course of our employment are offered because of our positions at Stevens. We should not feel any entitlement to accept and keep a business courtesy. Although we may not use our position at Stevens to obtain business courtesies, and we must never ask for them, we may accept unsolicited business courtesies that promote successful working relationships and good will with the firms that Stevens maintains or may establish a business relationship with. Employees who award contracts or who can influence the allocation of business, who create specifications that result in the placement of business or who participate in negotiation of contracts must be particularly careful to avoid actions that create the appearance of favoritism or that may adversely affect the company's reputation for impartiality and fair dealing. The prudent course is to refuse a courtesy from a supplier when Stevens is involved in choosing or reconfirming a supplier or under circumstances that would create an impression that offering courtesies is the way to obtain Stevens' business.

### ***Meals, Refreshments and Entertainment***

We may accept occasional meals, refreshments, entertainment and similar business courtesies that are shared with the person who has offered to pay for the meal or entertainment, provided that:

- They are not inappropriately lavish or excessive.
- The courtesies are not frequent and do not reflect a pattern of frequent acceptance of courtesies from the same person or entity.
- The courtesy does not create the appearance of an attempt to influence business decisions, such as accepting courtesies or entertainment from a supplier whose contract is expiring in the near future.
- The employee accepting the business courtesy would not feel uncomfortable discussing the courtesy with his or her manager or co-worker or having the courtesies known by the public.

## ***Gifts***

Employees may accept unsolicited gifts, other than money, that conform to the reasonable ethical practices of the marketplace, including:

- Flowers, fruit baskets and other modest presents that commemorate a special occasion.
- Gifts of nominal value, such as calendars, pens, mugs, caps and t-shirts (or other novelty, advertising or promotional items).

Generally, employees may not accept compensation, honoraria or money of any amount from entities with whom Stevens does or may do business. Tangible gifts (including tickets to a sporting or entertainment event) that have a market value greater than \$100 may not be accepted unless approval is obtained from management.

Employees with questions about accepting business courtesies should talk to their managers or the HR department.

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## ***Offering Business Courtesies***

Any employee who offers a business courtesy must assure that it cannot reasonably be interpreted as an attempt to gain an unfair business advantage or otherwise reflect negatively upon Stevens. An employee may never use personal funds or resources to do something that cannot be done with Stevens' resources. Accounting for business courtesies must be done in accordance with approved company procedures.

Other than to our government customers, for whom special rules apply, we may provide nonmonetary gifts (i.e., company logo apparel or similar promotional items) to our customers. Further, management may approve other courtesies, including meals, refreshments or entertainment of reasonable value, provided that:

- The practice does not violate any law or regulation or the standards of conduct of the recipient's organization.
- The business courtesy is consistent with industry practice, is infrequent in nature and is not lavish.
- The business courtesy is properly reflected on the books and records of Stevens.

## **Set Metrics and Report Results Accurately**

### ***Accurate Public Disclosures***

We will make certain that all disclosures made in financial reports and public documents are full, fair, accurate, timely and understandable. This obligation applies to all employees, including all financial executives, with any responsibility for the preparation for such reports, including drafting, reviewing and signing or certifying the information contained therein. No business goal of any kind is ever an excuse for misrepresenting facts or falsifying records.

Employees should inform Executive Management and the HR department if they learn that information in any filing or public communication was untrue or misleading at the time it was made or if subsequent information would affect a similar future filing or public communication.

### ***Corporate Recordkeeping***

We create, retain and dispose of our company records as part of our normal course of business in compliance with all Stevens policies and guidelines, as well as all regulatory and legal requirements. All corporate records must be true, accurate and complete, and company data must be promptly and accurately entered in our books in accordance with Stevens and other applicable accounting principles. We must not improperly influence, manipulate or mislead any unauthorized audit, nor interfere with any auditor engaged to perform an internal independent audit of Stevens books, records, processes or internal controls.

### **Promote Substance Over Form**

At times, we are all faced with decisions we would rather not have to make and issues we would prefer to avoid. Sometimes, we hope that if we avoid confronting a problem, it will simply go away. At Stevens, we must have the courage to tackle the tough decisions and make difficult choices, secure in the knowledge that Stevens is committed to doing the right thing. At times this will mean doing more than simply what the law requires. Merely because we can pursue a course of action does not mean we *should* do so.

Although Stevens' guiding principles cannot address every issue or provide answers to every dilemma, they can define the spirit in which we intend to do business and should guide us in our daily conduct. Remember no decision is above your pay grade. We just need to communicate to engage others and manager to resolve them.

### ***Accountability***

Each of us is responsible for knowing and adhering to the values and standards set forth in this Code and for raising questions if we are uncertain about company policy. If we are concerned whether the standards are being met or are aware of violations of the Code, we must contact the HR department. Stevens Board of Directors, senior management, middle managers and all leadership take seriously the standards set forth in the Code, and violations are cause for disciplinary action up to and including termination of employment.

### **BE LOYAL**

### ***Confidential and Proprietary Information***

Integral to Stevens' business success is our protection of confidential company information, as well as nonpublic information entrusted to us by employees, customers and other business partners. Confidential and proprietary information includes such things as pricing and financial data, customer names/addresses or nonpublic information about other companies, including current or potential supplier and vendors. We will not disclose confidential and nonpublic information without a valid business purpose and proper authorization.

### ***Use of Company Resources***

Company resources, including time, material, equipment and information, are provided for company business use. Nonetheless, occasional personal use is permissible as long as it does not affect job performance or cause a disruption to the workplace.

Employees and those who represent Stevens are trusted to behave responsibly and use good judgment to conserve company resources. Managers are responsible for the resources assigned to their departments and are empowered to resolve issues concerning their proper use.

Generally, we will not use company equipment such as computers, copiers and fax machines in the conduct of an outside business or in support of any religious, political or other outside daily activity, except for company-requested support to nonprofit organizations. We will not solicit contributions nor distribute non-work related materials during work hours.

In order to protect the interests of the Stevens' network and our fellow employees, Stevens reserves the right to monitor or review all data and information contained on an employee's company-issued computer or electronic device, the use of the Internet or Stevens' intranet. We will not tolerate the use of company resources to create, access, store, print, solicit or send any materials that are harassing, threatening, abusive, sexually explicit or otherwise offensive or inappropriate.

Questions about the proper use of company resources should be directed to your manager.

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### ***Media Inquiries***

Stevens is a high-profile company in our community, and from time to time, employees may be approached by reporters and other members of the media. In order to ensure that we speak with one voice and provide accurate information about the company, we should direct all media inquiries to the Director of Human Resources. No one may issue a press release without first consulting with the Director of Human Resources.

### **DO THE RIGHT THING**

Several key questions can help identify situations that may be unethical, inappropriate or illegal. Ask yourself:

- Does what I am doing comply with the Stevens guiding principles, Code of Conduct and company policies?
- Have I been asked to misrepresent information or deviate from normal procedure?
- Would I feel comfortable describing my decision at a staff meeting?
- How would it look if it made the headlines?
- Am I being loyal to my family, my company and myself?
- What would I tell my child to do?
- Is this the right thing to do?

### **ENVIRONMENT AND SUSTAINABILITY**

Stevens shall meet legal environmental requirements and expects its business partners to obtain, keep current, and comply with all required environmental permits and licenses needed for their operations. Stevens continuously seeks ways to reduce the consumption of resources. Stevens expects its business partners to strive to reduce its consumption of resources, including energy, waste and water, prevent pollution, have noise levels at acceptable levels and improved the overall environmental impact of its operations and products along the value chain. Further, chemicals and hazardous materials shall be labeled properly and safety stored, and recycled, reused and disposed of correctly.

## TRAINING AND CERTIFICATION

We take our commitment to ethical standards very seriously. Please take the time to read and understand the Code. You will periodically receive training, primarily web-based, on the Code. After you complete the training, you will be asked to certify that:

You have read and understand the Code, and will comply with the Code.

You understand that you all have an important role to play in speaking up and resolving issues. You are encouraged and required to report activities, which you in good faith believe are or may be violations of the Code.

You understand that if you violate the Code, fail to report a violation or retaliate against another employee for his or her action in reporting a violation that you may be disciplined, which might include termination of your employment, or face legal consequences.

A handwritten signature in black ink that reads "Todd Wegman". The signature is written in a cursive style and is positioned above a horizontal line.

Todd Wegman  
President

# Stevens Industries Inc. Mission Statement



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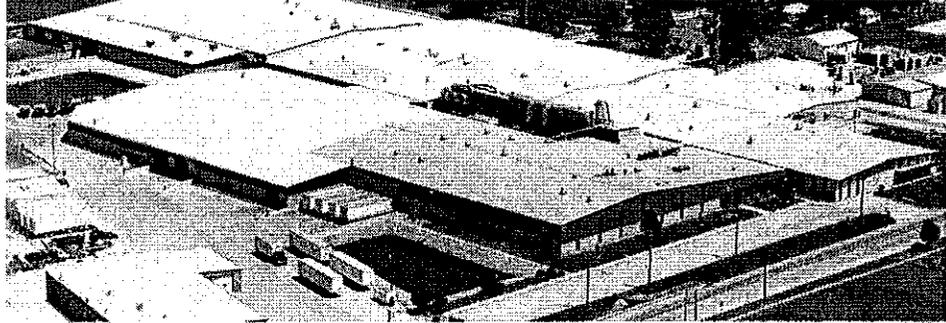
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## Mission

**Stevens Industries will be a world class manufacturer of wood and laminated products.**

- We shall emphasize attention to detail and simplicity in all our processes.
- We shall relentlessly pursue reduction of customer lead times.
- We shall provide new products and services reflecting greatest value and innovation in techniques and design.
- We shall maintain a lean, responsive, competitive organization.
- We shall strive for fair profits and sustain controlled growth through proper business planning.
- We shall maintain a friendly, clean, and safe work environment.
- We shall be responsible members of our community.
- We shall conform to sound environmental practices.

*Stevens Industries, inc. strives to create an inclusive environment, with respect for differences in age; ethnicity; gender; gender identity; nationality; physical, mental and developmental abilities; race; religion; sexual orientation; skin color and socio-economic status.*

*Diversity in thought, talent and life experience makes us stronger as a team.*

*I Am Stevens.*



## Human Rights Policy Statement

Stevens is committed to conducting business in an ethical and responsible manner. We respect and support international principles aimed at protecting and promoting human rights. In our own operations, Stevens seeks to operate in compliance with all applicable laws wherever we do business.

While governments have the primary responsibility for protecting and upholding the human rights of their citizens, Stevens recognizes its responsibility to respect human rights in its operations. In addition, we recognize that we have an opportunity to promote human rights where we can make a positive contribution.

## Company Workplace Policies

We strive to foster safe, inclusive and respectful workplaces wherever we do business. Stevens' workplace policies and practices include commitments to non-discrimination and freedom from harassment and require that the company refrain from knowingly entering into relationships that, directly or indirectly, expose team members to undue health and safety risks, or that use child, prison or forced labor, or other similarly exploitative practices.

## Human Rights Within Our Sphere of Influence

We also strive to foster safe, inclusive and respectful workplaces. We expect the same commitment from business associates and vendors.

## Non-Discrimination and Harassment

It is the policy of Stevens to attract and retain the best qualified people available without regard to race, color, religion, national origin, gender, sexual orientation, gender identity, age, physical or mental disability or veteran status. People are employed based on the principle of equal opportunity. Our nondiscrimination policy applies to applicants as well as employees and covers all terms and conditions of employment, including recruiting, hiring, transfers, promotions, terminations, compensation and benefits. Discrimination or harassment based on any of the above factors is prohibited, as is retaliation against a person who has made a complaint or given information regarding possible violations of this policy. Stevens will make its decisions regarding present and future employees based on objective

criteria. Stevens respects cultural and individual diversity and promotes inclusiveness. One aspect of safeguarding the integrity of each team member is to ensure that harassment in any form does not occur and, if it does occur, to ensure that adequate procedures are readily available to deal with the problem and prevent recurrence.

## Work Environment and Compensation

We are committed to promoting a work environment that fosters communication, productivity, creativity, teamwork and employee engagement. We seek to provide employees with compensation and benefits that are fair and equitable for the type of work and geographic location where the work is being performed.

## Health and Safety

Stevens' provides its team members with a safe and hygienic working environment and working conditions. Stevens will take appropriate measures to continuously improve safety and health aspects within its facilities, including the provision of personal protective equipment when and where necessary. Working conditions should allow for safe working practices and support the occupational health and well-being of team members. We maintain a protocol of continuous improvement of our health and safety performance.

## The Rights of Children

The well being of children is important to Stevens. We support efforts combatting the exploitation of children and therefore prohibit any use of child labor. Stevens opposes exploitation of children.

Stevens will act in such a way that none of its operations knowingly contribute to human rights violations. Employees who believe there may have been a violation of policy should report this to their group manager or human resource department. No retaliatory action will be tolerated against anyone who comes forward to raise genuine concerns about possible policy violations. Stevens may conduct assessments, as needed, to measure compliance to policies and expectations regarding the development of an inclusive and respectful culture.



## People

### Equality & Inclusion Policy

#### Our promise

We are committed to fostering an environment of inclusion for all our team members. Our success depends on maintaining a diversity of talents, cultures, and management styles. By valuing our similarities and differences, we build upon our strengths and enhance our work environment. Team members should embrace the diversity of our organization, their insights and individual perspectives, and treat others inclusively with respect.

#### It Starts with Us

- Stevens recruits, hires, trains, and promotes individuals regardless of: race, color, religion, age, gender, national origin, ancestry, citizenship status, marital status, sexual orientation, gender identity or expression, disability, pregnancy, veteran status, genetic information or other legally protected Status.
- Stevens makes employment decisions Based on an individual's knowledge, experience, and abilities, evaluating performance and promoting qualified Individuals in a manner consistent with Strategic priorities.
- Stevens works together to encourage team members, creating respectful, strong, and successful relationships. Stevens encourages team members to increase our level of self-awareness by participating in upward feedback and inclusion surveys

#### Be Alert To

- Inappropriate email or internet use
- Behavior that may interfere with work performance or contribute to a hostile work environment
- Off-color jokes or otherwise inappropriate comments
- Unwanted, inappropriate, or disrespectful sexual advances or acts
- Anyone who refuses to work with another team member for inappropriate reasons

## Responsibilities and commitment

Each team member is responsible for their own behavior and must accept the principle that there is equality of opportunity and fairness for all team members and anyone associated with Stevens (e.g. visitors, contractors and service providers).

Team members must ensure they do not support unfair behavior by ignoring what is happening around them and must not incite or collude with unfair or unlawful discrimination.

Any member of Stevens that is found to be responsible for inciting, perpetrating or colluding with discrimination, harassment or bullying may face disciplinary action up to and including termination.

All team members and anyone associated with Stevens, is ultimately responsible for ensuring Stevens fulfills its responsibilities to promote equality and eliminating discrimination.

## Complaints of Discrimination or Harassment

If a team member feels that they are being bullied, harassed, or discriminated against, the complaint should be raised in accordance with the Stevens Harassment Policy and Bullying Policy. Advice on the use of these procedures can be obtained from Human Resources.

## Supporting Policies & Guidance

Stevens has a range of policies and guidance that support the underlying principles of inclusion and non-discrimination.

These include:

- Equal Opportunity Policy
- Work Rules Policy
- Bullying Policy
- Harassment Policy
- Dispute Resolution Policy
- Recruitment / Hiring Policy
- Diversity, Equality & Inclusion (non-discrimination) Policy

## **Equality & Inclusion Policy**

Stevens is committed to providing an inclusive work environment that encourages and welcomes diversity with a zero-tolerance policy of harassment and discrimination.

The aim of this policy is to ensure that all team members know that they are able to work in an environment that is free from discrimination and harassment and are able to achieve their full potential in their job without distraction. Stevens will make decisions without reference to discriminatory criteria.

### **Scope**

This policy applies to all team members who are employed at Stevens Industries and all contract staff who are contracted with the company. It also applies to all other individuals with whom team members come into contact during the course of their employment, in particular job applicants.

### **Team member Conduct**

If a team member is at all unsure of anything under this policy, they should speak to their manager or human resource department. Any complaints of discrimination or violation of policy should be reported to the manager or human resources as soon as possible.

### **Ethics**

All recruitment procedures followed by Stevens will be on the basis of fair and objectively justified criteria. Where job applicants have a disability the position of the applicant will be reviewed, and all possible steps will be taken to ensure that the applicant does not suffer from any disadvantage in the recruitment process.

### **Diversity**

We believe a diverse workforce is a more effective workforce. People of different backgrounds, education and ways of thinking allow for a more robust source of ideas, innovation, management styles and capabilities.

We treat people with protected characteristics with fairness and equality and ensure that our harassment and Bullying Policies are applied to everyone. For clarity, nobody will be treated less favorably than another on grounds of; age, gender, disability, gender identity, gender reassignment, race, religion, national origin, ancestry, citizenship status, marital status, genetic information, veteran status, and sexual orientation. This also includes anyone perceived to have one of the above characteristics whether they identify with it or not, and covers anyone associated with a person who has, or is perceived to have, one or more protected characteristics.

We have a zero-tolerance policy on discrimination.

## **Inclusion**

An inclusive policy promotes team member satisfaction and retention, reducing costs and maximizing employee experience. We believe that a truly inclusive workplace allows everyone to feel safe and relaxed about their identities, allowing them to focus 100% on the job in hand results in a more successful company. Nobody should need to spend time worrying about who knows about their protected characteristics and know that there are policies in place to protect them should they experience harassment.

Team members must understand and embrace the uniqueness of all individuals, appreciating that each contributes a diversity of views, experiences, cultural heritage/traditions, skills/abilities, values and preferences. The recognition of diversity within Stevens is demonstrated by valuing differences and similarities in people through actions and accountability. These differences and similarities include age, ethnicity, language and culture, economic status, educational background, gender identity or expression, geographic location, material status, mental ability, national origin, organizational position and tenure, parental status, physical ability, political philosophy, race religion, sexual orientation and work experience.

Violation of this policy can result in disciplinary action up to and including termination.

Therefore, team members at every level must:

- Openly assess beliefs and practices to assure inclusiveness and guard against discrimination
- Make every effort to create a diverse workforce that is inclusive and reflective of the community
- Foster programs and practices that eliminate bias, prejudice and misunderstanding
- Propose change wherever discriminatory practices are perceived.