



Global Statement on Human Rights and Conflict Minerals

A. O. Smith Global Human Rights Statement

A. O. Smith Corporation respects and upholds basic human dignity and human rights, they are core to our values and our *Guiding Principles*.

Our employees and suppliers are expected to act in a socially and environmentally responsible manner. We require them to comply with all applicable laws and regulations and demand corruption-free decision making. Management decisions include consideration of appropriate equal employment, environmental, occupational health and safety, and human rights and labor policies.

We hold our employees and suppliers accountable for complying with such policies. Where applicable, we have incorporated such language in our Supplier Requirements Manual.

Our specific statements on the California Transparency in Supply Chains Act and Conflict Minerals can be found below.

California Transparency in Supply Chains Act

At A. O. Smith, there is an uncompromising commitment to following all applicable laws and regulations (including laws on human trafficking, conflict minerals, and chemical and hazardous substances), including those that prohibit human trafficking and slavery, and we require the same of our manufacturers and suppliers. Our Code of Conduct, also known as our *Guiding Principles*, reinforces the importance of ensuring compliance with human trafficking and slavery laws.

Governance

At A. O. Smith we respect the human rights of the individuals, groups, and communities impacted by our operations and our products. A. O. Smith's human rights programs are informed by the *UN Guiding Principles on Business and Human Rights*. The A. O. Smith ESG Council regularly reports to the Board of Directors and includes recommendations that continue to support our Global Human Rights Statement. We are committed to ongoing human rights assessments and reporting and strive to be transparent in our efforts through our *Sustainability Report*. Additional information on our commitment to sustainability can be found on our website at AOSmith.com/Sustainability.

We prohibit corruption, extortion, embezzlement, bribery, and any other means of obtaining an improper advantage in our competitive fields. We respect the legitimate right to privacy and collect, use, and process personal information of A. O. Smith employees, customers, and third parties in accordance with applicable privacy laws. We prohibit retaliation for



reporting violations in good faith and protect employee, customer and supplier “Whistleblower” confidentiality.

Fair Labor Standards

A. O. Smith does not tolerate the use of child labor, forced labor, or human trafficking within our operations and supply chain. We prohibit the employment of individuals under the minimum age allowed by applicable law.

We provide fair compensation and benefits, and comply with applicable wage laws, regulations, and relevant collective bargaining agreements, including those relating to minimum wages, overtime hours and legally mandated benefits. We respect employees' voluntary freedom of association, including their voluntary right to join or not join labor organizations in compliance with applicable laws. For more information, please visit our *Canada Forced Labor Disclosure*.

Value Chain

A. O. Smith is committed to ethical business practices throughout our value chain. We require all partners to meet our human rights standards including fair labor practices, health and safety management, maintaining environmental standards, and preventing harassment or discrimination in the workplace.

We have a supplier due diligence process and require suppliers adhere to A. O. Smith's Guiding Principles, complete supplier self-assessments, and allow for on-site supplier audits by A. O. Smith. Among other factors, Suppliers are evaluated for their ability to meet A. O. Smith's Environmental and Social Sustainability Requirements and receive ongoing monitoring to ensure consistency with global regulatory standards. Our supplier due diligence process includes screening and monitoring for human trafficking and slavery within our supply chain. Suppliers are evaluated before engagement and continuously throughout the relationship with A. O. Smith.

The corporate legal department and the trade compliance department oversee and monitor the Third-Party Due Diligence program. If there is an issue identified, the business will be notified, and action will be taken to address the concern.

At onboarding, all employees are assigned training on relevant policies associated with their role and our Guiding Principles. All salaried employees globally are required to complete certification and attestation to our Guiding Principles annually. Employees with responsibility for the Third-Party Due Diligence program are trained in adding and managing third parties, and handling alerts raised by the system.



Safety and Health

We are committed to minimizing worker exposure to potential safety hazards through proper design, engineering and administrative controls, preventive maintenance, and safe work procedures. We maintain appropriate emergency plans and response procedures for health and safety concerns. We strive to continuously improve health and safety performance in all our operations.

A. O. Smith also maintains an Environment, Health Safety, and Security (EHSS) Council that provides development and implementation of our comprehensive EHSS program. The EHSS Council's goal is to continue to develop sustainable practices throughout our global operations.

Anti-Harassment and Discrimination

We are devoted to maintaining a work environment free from physical or mental harassment, abuse and intimidation, including that related to race, gender identity, sexual orientation, age, pregnancy, caste, disability, union membership, ethnicity, religious beliefs or any other factors protected by law.

Environmental Impacts

We are committed to minimizing the environmental impact of our operations by recycling and minimizing waste, preserving natural resources like water, reducing emissions generated by our activities, and avoiding or minimizing the use of hazardous substances. We acquire maintain and comply with appropriate environmental laws, permits and regulations.

Statement on Conflict Minerals

A. O. Smith Corporation is committed to supporting responsible sourcing of its materials from suppliers that share our values, including our commitment toward human rights and environmental responsibility. In this regard, we are committed to complying with *Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act*, and the related rules and regulations issued by the *U.S. Securities and Exchange Commission* ("Conflict Minerals Rules"). The *Conflict Minerals Rules* require all public companies to perform supply chain due diligence to identify the extent to which their products contain Conflict Minerals originating from the Democratic Republic of Congo and certain adjoining countries ("Covered Countries"). The goal of the Conflict Minerals Rules is to cut direct and indirect funding of any mines in the Covered Countries that are controlled by armed militias responsible for humanitarian abuses. The minerals covered by the Rules are tin, tantalum, tungsten and gold ("Conflict Minerals").



We support the humanitarian goal of ending violent conflict in the Covered Countries. As part of our efforts, we expect all suppliers of components for our products to annually assess their entire supply chain and provide us with detailed information about their use and source of Conflict Minerals. We are committed to responsible sourcing of Conflict Minerals throughout our supply chain and to continuing to comply with the underlying SEC rules and regulations surrounding Conflict Minerals.

Reporting Suspected Violations and Other Ethical Concerns

We encourage employees to raise any issues and concerns with their Supervisor, Facility Leader, Human Resources department, a member of the Legal Department or through the *24-hour Integrity Helpline*. Our Integrity Helpline provides an accessible and confidential grievance process for all of our employees, customers, and suppliers

The Integrity Helpline is staffed with trained communications specialists from an outside service who will listen to the concern. All calls are investigated, and a timely response is provided. A concern in any compliance area, including with respect to human trafficking or slavery, can be reported by phone or website form available at www.aosintegrity.com.

We take all reports seriously and do not tolerate retaliation against anyone who raises a concern or violation in good faith. To promote reporting and use of our Integrity Helpline, A. O. Smith makes it clear in our Guiding Principles and in a separate Non-Retaliation Policy that retaliation against an individual raising a concern is prohibited