

Supplier Diversity and Inclusion Policy

At Turtle, we understand the challenges diversity suppliers face in developing their businesses, serving their communities, and creating value for their employees and customers. As a 100-year-old family business and a woman-owned and led company, our customers have been a source of encouragement and mentoring as we expand and grow. With this historical perspective, we recognize our role in identifying and developing our own suppliers from diverse backgrounds. We believe that mentoring suppliers strengthens our communities.

Our ability to compete for business is predicated on the quality of supplier products and services; diversity suppliers represent an important part of that supply base. Our Supplier Diversity & Inclusion Policy clearly outlines Turtle’s commitment to purposely develop this supply base and provide opportunities.

Respectfully,

Jayne Millard

Luis Valls

Co-CEO and Executive Chairman of the Board

Co-CEO and President, Electrical Division

Turtle is committed to identifying and developing qualified disadvantaged business partners to deliver optimal value and services to our clients. The intent is to develop strategic relationships that augment and enhance our supply chain capabilities. We see this as an opportunity for disadvantaged businesses to grow with our organization.

Turtle seeks to develop a capable diverse supply base with small, minority-owned, women-owned, disadvantaged/disabled, veteran-owned and LGBTQA business enterprises strongly represented. Our intent is to develop and sustain an environment where all will have an equal opportunity to be included in our strategic sourcing and procurement process. It is our express intent to create a mutually beneficial relationship. Companies that seek to do business with Turtle must demonstrate the ability to add value and provide high-quality goods and services that are competitively priced, reliable, and aligned with our superior level of service.

We believe that our ability to compete and grow customer relationships is the result of our extended enterprise whereby our suppliers directly contribute to the success of Turtle.

Our supplier diversity efforts include:

- Actively identifying certified diverse suppliers that can provide competitive, high-quality goods, services, and solutions whose business models are aligned with both Turtle’s core values and business strategies.
- The inclusion of diverse suppliers as a part of our strategic sourcing and procurement process whereby category leads are required to include diversity suppliers.
- Communication of the value of supplier diversity both internally and externally to Turtle’s stakeholders including training on the value of supplier diversity to our enterprise and its customers.
- Sharing our supplier diversity key performance indicators and results.
- Meeting our clients’ supplier diversity goals and requirements.
- Providing mentorship and business development support to select diversity suppliers.
- Broad inclusion of suppliers certified as:
 - **Minority-Owned or Minority Business Enterprise (MBE)** - A business concern that is at least 51 percent owned by one or more minorities; or, in the case of any publicly owned business, at least 51 percent of the stock is owned by one or more minorities; and whose management and daily business operations are controlled by one or more minorities.
 - **Women-Owned or Women Business Enterprise (WBE)** - A business concern that is at least 51 percent owned by one or more women, or, in the case of any publicly owned business, at least 51 percent of the stock is owned by one or more women, and whose management and daily business operations are controlled by one or more women.
 - **Women-Owned Small Business Concerns (WOSB)** - A small business concern that is at least 51 percent owned by one or more women, or in the case of any publicly owned business, at least 51 percent of the stock is owned by one or more women, and whose management and daily business operations are controlled by one or more women.
 - **Self-Certified Small Disadvantaged Business Concern (SDB)** – A “for profit” business concern:
 - that qualifies as “small” per the [SBA Table of Small Business Size Standards Matched to North American Industry Classification System Codes](#), and
 - that is at least 51 percent unconditionally owned by one or more U.S. citizens who are socially and economically disadvantaged individuals, and
 - whose management and daily business operations are controlled by one or more U.S. citizens who are socially and economically disadvantaged individuals, and
 - the personal net worth of each individual claiming economic disadvantage is less than \$750,000 (except for tribes, Alaskan Native Corporation-Owned Concern (ANCs), Community Development Corporation-Owned Concern (CDCs) and Native Hawaiian Corporation-Owned Concern (NHOs).
 - **HUBZone Small Business (HUB)**- A business concern located in a "historically underutilized business zone," owned and controlled by one or more U.S. Citizens, and at least 35% of its employees must reside in a HUB Zone. It must appear on the list of Qualified HUBZone Small Business Concerns maintained by the SBA.
 - **Veteran (V)** - A person who served in the active military, naval, or air service, and who was discharged or released there from under conditions other than dishonorable as defined in title 38 of the U.S.C., section 101 (2).

- **Service-Disabled Veteran (SDV)** - A veteran with a "service connected" disability, which means a disability that was incurred or aggravated, in the line of duty in the active military, naval, or air service as defined in Title 38, of the U.S.C., section 101 (16).
- **Veteran-Owned Small Business Concerns (VOSB)** - A small business concern that is at least 51 percent owned by one or more veterans, or in the case of any publicly owned business, at least 51 percent of the stock is owned by one or more veterans, and whose management and daily business operations are controlled by one or more veterans.
- **Service-Disabled Veteran-Owned Small Business Concerns (SDVOSB)** - A small business concern that is at least 51 percent owned by one or more service-disabled veterans, or in the case of any publicly owned business, at least 51 percent of the stock is owned by one or more service-disabled veterans, and whose management and daily business operations are controlled by one or more service-disabled veterans or a permanent caregiver of a service-disabled veteran with permanent and severe disability.
- **Alaskan Native Corporation (ANC)** - Any Regional Corporation, Village Corporation, Urban Corporation and or Native Group organized under Alaska state laws and which is considered a minority and economically disadvantaged concern. This definition includes eligible ANC direct and indirect subsidiaries, corporations, joint ventures, and partnerships
- **Indian Tribes or Tribally-Owned (NAO)** - Any Federally-recognized Indian Tribe, band, group, pueblo, or community (including native villages and native groups) that is eligible for services from the Bureau of Indian Affairs (BIA).
- **Certified 8(a) (8A)** – Business is owned and operated by socially and economically disadvantaged individuals and is eligible to receive federal contracts under the Small Business Administration’s 8(a) Business Development Program. All individuals must have a net worth of less than \$250,000, excluding the value of the business and primary residence. 8(a) firms automatically qualify for Small Disadvantaged Business certification.
- **Disabled-Owner (DA)** - At least 51 percent owned by handicapped persons who exercise the power to make policy decisions and who are actively involved in the day-to-day management of the business. A handicapped person has a physical or mental impairment that substantially limits one or more major life activities, has a record of such impairment, or is regarded as having such impairment.
- **LGTBQA Owned (LGTBQA)** – A business that is at least 51% owned and operated by a LGTBQ person(s).

Turtle will report to its stakeholders our progress against diversity goals in our annual ESG report. intent is to live up to a standard rather than merely speak to it. This policy has the full support of the Turtle procurement function, the senior executive committee and the Board of Directors.
