



# SUPPLIER CODE OF CONDUCT

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## 1. INTRODUCTION

Our company operates every aspect of our business to the highest of standards. Fort Vale is synonymous with excellence in engineering has a reputation for high levels of quality and safety. Our business ethics and core values of Honesty, Commitment and Integrity are important to the way we conduct our business and help to develop strong, long term relationships.

Our suppliers are an integral part of our business and are an essential partner in the delivery of our standards and principles. We expect our suppliers to be responsible and ethical, comply with all applicable laws and our Supplier Code of Conduct. If local laws and regulations impose stricter requirements than this Supplier Code of Conduct, suppliers must comply with those requirements.

## 2. PURPOSE

The Supplier Code of Conduct details our standards and principles that our suppliers are expected to adhere to.

## 3. SCOPE

This Supplier Code of Conduct is applicable to all suppliers who supply product or services to the Fort Vale group of companies. Our suppliers must ensure their own supply chain complies with the principles of this Code of Conduct.

## 4. PRINCIPLES

### 4.1. Health & Safety

Provide and maintaining a working environment that is, so far as is reasonably practicable, safe and without risks to health, and complies with all relevant legal requirements.

Provide and maintain suitable and satisfactory facilities and arrangements for the welfare at work of employees.

Provide and maintain, so far as is reasonably practicable, premises and other places of work that are safe and without risks to health, including safe means of access and exit.

Ensure, so far as is reasonably practicable, that plant, machinery, equipment or appliances for the time being on the company premises, or otherwise used by employees, are safe and without risks to health.

Provide such information, instruction, training and supervision as is necessary to ensure, so far as reasonably practicable, the health and safety at work of employees.

Ensure that the use, handling, storage and transport of articles and substances are, so far as is reasonably practicable, safe and without risks to health.

Consult with employees on a regular basis regarding matters of health and safety.

Identify all reasonably foreseeable hazards and assessing the associated risks with a view to eliminating, reducing or controlling them.



#### 4.2. Quality

Supply high quality products and services that comply with all specific customer requirements, delivered on time and without defect.

Ensure all goods and services supplied are in compliance with all relevant laws and regulation.

Operate a continuous improvement process.

Provide appropriate training, instruction and supervision to ensure all employees are able to perform their duties.

Encourage responsibility that quality is the responsibility of everyone.

All metallic material producers, including casting and forging companies, shall have a Quality system certified by a recognised EU competent body.

Have a management system that meets the requirements of ISO 9001:2015 and preferably the system shall be certified.

#### 4.3. Environmental

Comply with the requirements of relevant environmental legislation and approved codes of practice.

Co-operate fully and maintain open relationships with regulatory authorities and other stakeholders.

Assess the environmental impact of company operations on the environment and community and set objectives and targets, to reduce these impacts.

Reduce pollution produced in all parts of the business.

Include environmental considerations in investment decisions.

Encourage commitment from all employees to improving the environmental performance of the business.

Aim to reduce the use of all raw materials, supplies and energy and, wherever possible, use renewable or recyclable materials and components.

Assist customers to use the company's products and services in an environmentally sensitive way

All employees to act in a responsible manner and to take reasonable care for the environment whilst conducting work activities.

All employees to co-operate with any measures undertaken to comply with statutory requirement under environmental law.



#### 4.4. Business Ethics and Confidentiality

Conduct all business relationships in an ethical manner with respect and integrity.

Conduct all business free from any Fraud, Bribery or Corruption.

No gifts or hospitality shall be given or received that could appear to influence business decisions.

Any Conflict of Interest or potential Conflict of Interest shall be declared.

Comply with all privacy and data protection laws in respect to personal data.

Protect commercially sensitive and confidential information from unauthorised access, use and disclosure.

#### 4.5. Modern Slavery & Human Rights

Comply with all relevant laws and regulations.

Ensure a zero tolerance approach to modern slavery.

Not use any form of slavery, servitude, forced or compulsory labour or human trafficking.

Ensure a due diligence approach to the supplier selection process & manage supply chain risk.

Increase awareness of modern slavery and human trafficking to ensure employees have a level of understanding of the associated risks.

Report any instances of modern slavery or human trafficking identified within the supply chain.

Encourage openness and support to anyone who raises genuine concerns.

Not use child labour; suppliers are required to only employ workers who meet the applicable legal age requirement in their countries of operation.

Comply with all local laws relating to working hours, wages and benefits.

#### 4.6. Business Continuity

Implement and maintain a system of prevention and recovery to ensure continuation of business in the event of a major disruption event.

#### 4.7. Compliance with export control regulations and sanctions regime

Comply with any laws or regulations which impose economic, trade or other restrictive measures or export, re-export licenses or other authorisations in each case issued and enforced by relevant national or international authority ("Sanctions and Export Control Laws").

Not directly or indirectly, import, export, re-export any Products or components or subcontract any of its activities: (a) to or in any country which is the subject of commercial, economic, or financial restrictions pursuant to any applicable Sanctions and Export Control Laws and/or (b) to any Sanctioned Person (as defined by the relevant rules).

Ensure a due diligence approach to the supplier selection process and manage supply chain risk.



Make sure to be up to date with applicable Sanctions, Export Control Laws and relevant obligations.

Ensure employees have a level of understanding of the associated risks.

Report any instances of breaching sanctions within the supply chain.

Encourage openness and support to anyone who raises genuine concerns.

## 5. COMPLIANCE

Fort Vale reserves the right to assess supplier's compliance with this Code of Conduct.

Fort Vale reserves the right to terminate contracts in the event of non-compliance with this Code of Conduct.

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