



## **Elder Engineering (Herts) Ltd Supplier Code of Conduct**

### **Sustainability**

As a manufacturer and supplier of machined components and tape products, we purchase raw materials, commodities and services from worldwide sources to provide sustainability of our organisation and responsible continuity of supply for our customers.

This requires responsible management with a long-term view. Our supplier base is an integrated part of our sustainability strategy. During our purchase operations, we carefully consider economic, technical, ecological, human factors and anti-corruption concerns.

The principal considerations for suppliers include cost, quality, reliability, and sustainability

We expect our suppliers and all staff under their control to act in an ethical manner, comply with applicable laws, the United Nations Global Compact Principles and our code of conduct. We expect our suppliers to introduce suitable processes within their organisations supporting legal compliance and driving improvements with regard to the principles outlined in our Code of Conduct. We expect these principles to be cascaded through the supply chain for application by any other contractors or associates.

### **Product or Service Conformity and Product Safety**

Elder Engineering (Herts) Ltd expect our suppliers to ensure persons performing work under their control are made aware of their contribution to product or service conformity and their contribution to product safety.

### **Human and Labour Rights**

respect and comply with the fundamental rights granted to all employees by applicable national laws and regulations. We expect suppliers to respect the rights of third parties and to minimise possible adverse effects taking into account all relevant international standards including the labour standards issued by the International Labour Organisation (ILO)

### **Child Labour**

Elder Engineering (Herts) Ltd expect our suppliers to prohibit and refrain from any kind of child labour within their organisation.

### **Discrimination**

We expect our suppliers to promote equal opportunities and equal treatment. Our suppliers are expected to prohibit any form of discrimination in recruiting, promoting, or selecting employees for training programs. It is expected that no employee should be discriminated against based on gender, age, colour, race, ethnic or social origin, nationality, sexual orientation, religion, disability, world view or political opinion.

### **Forced Labour**

We expect all our suppliers to prohibit any form of forced labour, or human trafficking in their organisation and any contribution to it, including engagement in work housing, or termination activities that support or create trafficking conditions.

### **Freedom of association**

Elder Engineering (Herts) Ltd expect our suppliers to respect the right of their employees to form workers councils, collective bargaining units or other employee representations and to enter into collective bargaining.

## **Working Time and Remuneration**

We expect our suppliers to fully comply with applicable national laws on working time. Further, we expect that the employees of our suppliers receive remuneration in line with the law.

## **Conflict Minerals**

We expect suppliers to adhere to all regulations. Suppliers are expected to be conflict free

## **Health and Safety**

We expect our suppliers to fully comply with all applicable laws governing Health and Safety at Work. Our suppliers are expected to establish and maintain an appropriate Safety Management system (OHSAS 18001 for example). This includes containing potential, as well as actual risks in work. Our suppliers are expected to train their employees (and others as appropriate) for the purpose of preventing accidents and occupational disease.

## **Environmental Protection**

We expect our suppliers to comply with all relevant laws regulations and standards to protect the environment. Our suppliers are expected to establish and maintain a suitable environmental management system to minimise environmental impact and hazards relating to their everyday operations.

## **Conduct in Business Environment**

### **Prohibition of Corruption and Bribery**

Elder Engineering (Herts) Ltd expect our suppliers to have zero tolerance for corruption and to ensure compliance with all United Nations (UN) and Organisation for Economic Development (OECD) conventions against corruption and with all governing anti-corruption laws. In particular, our suppliers are expected to ensure that employees, subcontractors and agents do not offer, promise, or grant any advantages to any Elder Engineering employees or related parties with the goal of securing an order, award or any other form of preferential treatment in their business transactions.

### **Invitations and Gifts**

We expect our suppliers to refrain from presenting any invitations or gifts to our employees so as to gain any form of influence. Any invitations or gifts extended to Elder Engineering (Herts) Ltd employees or related parties, if any, must be reasonable and suitable with a view to scope and design, i.e. they must be of low financial value and reflect ordinary local business custom. We also expect our suppliers to refrain from asking Elder Engineering Employees or related parties for any inappropriate advantages.

### **Preventing Conflicts of Interest**

In our suppliers' business dealings with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence our suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other parties.

### **Unrestricted Competition**

At Elder Engineering (Herts) Ltd, we expect our suppliers to compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter with competitors into agreements that might constitute a breach of antitrust law, nor take advantage of any dominant market position they might hold.

### **Money Laundering**

We expect our suppliers to comply with all applicable statute governing the prevention of money laundering, and not to participate in any money laundering activities.

## **Supplier Relations**

At Elder Engineering (Herts) Ltd, we expect our suppliers to communicate the principles laid out herein to their subcontractors and sub-suppliers and to take these principles into account when selecting subcontractors and sub-suppliers. Our suppliers are expected to encourage their subcontractors and sub-suppliers to comply with the minimum standards of the code of conduct regarding the protection of human rights, working conditions, anti-corruption and environmental protection when fulfilling their contractual obligations. Further, we expect our suppliers to only source material from legal sources and if requested, provide evidence on the legal source.

### **Compliance with the Elder Engineering (Herts) Ltd Supplier Code of Conduct**

We may review our suppliers' compliance with the principles and requirements laid out in the Elder Engineering (Herts) Ltd Supplier Code of Conduct, asking our suppliers to complete a self-assessment not more than once a year. Further, we reserve the right to consult with each supplier and to either perform a sustainability audit at the supplier's site or to appoint a qualified third party to perform the audit.

Any violation of the principles and requirements set out in this code of conduct will be regarded as a serious violation of the supplier regarding his contractual obligations to Elder Engineering (Herts) Ltd.

In the event the supplier is suspected of violating any of the principles or requirements laid out in the Elder Engineering (Herts) Ltd Supplier code of Conduct, (e.g. based on negative media reports) Elder Engineering (Herts) Ltd reserves the right to request from the supplier that all relevant information be disclosed.

In the event the supplier evidently fails to fulfil any of the principles or requirements set out in this code of conduct, or refuses to pursue and implement measures for improving sustainability performance, after having been given a reasonable period of grace, Elder Engineering (Herts) Ltd reserves the right to immediately terminate any or all contracts with the supplier for cause.