



Supplier Code of Conduct

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Supplier Code of Conduct

1. Introduction

At Motion Control Products maintaining our reputation is maintained with our customers and suppliers is critical. We pride ourselves on ensuring good service, working with integrity and ensuring high standards across the business.

We adhere to the highest standards of business conduct, ethical behaviour and operate our company in a manner compliant with the law, best business practices, respect of human rights and adhere to health and safety and environmental standards. Our commitment to these standards is ingrained into our culture, inspires our work and strengthens our standing with suppliers and customers alike.

As a supplier it is important that you are clear on what Motion Control Products expects for our relationship to be beneficial for all parties. The objective of this document is to outline expectations, build trust and develop our relationship through improved performance. The behaviours identified are adopted within Motion Control Products.

This document should be made available to all of your employees, parent companies, subsidiaries and subcontractors to ensure compliance throughout the supply chain.

We require all suppliers to sign this document and those who choose not to sign are implying that they do not fully comply with the standards outlined; such failure may impact future business dealings should information not be readily available.

2. Our Commitment

This Code of Conduct is two way and we do not expect anything from our suppliers that we would not aim to achieve ourselves.

We expect our employees to treat suppliers fairly and respectfully and work jointly with their contacts in the supply chain. Both parties to work collaboratively, honestly and fairly in all communication and agreements.

We will ensure all employees of Motion Control Products will be made aware of the Code of Conduct and abide by its behaviours, too.

3. Your Commitment

You will commit to the standards set out in the Code of Conduct and ensure that they are applied consistently.

You will raise any breach, suspected or otherwise, directly with your contact at Motion Control Products including those arising from employees, parent companies, subsidiaries and subcontractors throughout the supply chain.

You will not intentionally bypass this document or provide inaccurate information on the matters raised in this document.

Our employees have the right to respectful treatment and Motion Control Products will not tolerate discrimination, harassment or victimisation.

4. Compliance

The Supplier Code of Conduct is a document laying out the way in which you interact with Motion Control Products.

It is not intended to be legally enforceable or create legal obligations that you are not subject to already. However it is intended to provide Motion Control Products with some security that they are working with ethical and legally compliant companies within their supply chain.

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This document does not bypass any laws, legislation or enforcements by regulatory bodies, authorities or courts where they have jurisdiction. You are expected to abide by the applicable laws and regulations of the countries in which you operate and to which you are subject to.

5. Respect for Employees

Supplier shall promote equal opportunities for and ensure the treatment of its employees, irrespective of his, her or their gender, race, colour, age, religion, sexual orientation, nationality or ethnicity, political affiliation, marital status, disabilities, and/or other aspects. Supplier shall respect the personal dignity, privacy and rights of each individual.

There shall not be unacceptable treatment of employees in any form, such as harassment, violence, abuse or exploitation. This includes you, as a Supplier, for your own employees and when dealing with employees of Motion Control Products. The employees of Motion Control Products will offer the same courteous and respectful behaviour without prejudice.

Supplier shall provide fair remuneration and to guarantee the applicable national statutory minimum wage, and comply with the maximum number of working hours laid down in the applicable laws. You shall recognise the right of free association of its employees in accordance with local labour laws.

6. Human Rights & Employment

All suppliers must abide by applicable human rights laws and employment laws in the countries and jurisdictions that they work in. This includes working with the regulations outlined in the Modern Slavery Act 2015 as outlined in section 8 below.

Motion Control Products is keen to ensure that all people working within its Supply Chain are treated fairly and equally and not under duress, discrimination or harassment.

Motion Control Products does not tolerate any form of forced labour within our supply chain. Anyone working within the supply chain must be doing so of their own free will. Any type of forced, bonded or prison labour is prohibited. Suppliers should not be allowed to confiscate an employee's passport or other key identification documents.

Child labour is prohibited and will not be tolerated. You, as the Supplier, shall not employ workers under the age of 15, or the minimum age requirement stipulated in your local governing law and legislation. If you, as a Supplier, employ workers under 18 either on a permanent or temporary basis (such as apprenticeships, holiday work etc.) you will ensure that they are not in a position where their health or safety is at risk ensuring proper management, training and due diligence of educational partnerships is undertaken.

We believe that any person employed or engaged by our suppliers is entitled to form or join an employee organisation or union of their choice. Such organisation or union to conduct bargaining and defending the rights of that person where required. If national laws prohibit or restrict this right suppliers should allow their employees to have representatives in order to promote their wellbeing and common interests by engaging in direct communication with their employers.

All suppliers must support equal opportunities, fairness and diversity without prejudice against protected characteristics of age, sex, religion or belief (including no belief), disability, gender (including reassignment) marriage and civil partnership, pregnancy and maternity, race and sexual orientation.

All employees of our suppliers must be provided wages at least equal to the minimum wage of the countries you operate in. If there is no legal minimum wage then suppliers must ensure that wages are comparable to those of similar companies in the area. The same

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applies to working hours and other working conditions; these must be comparable for the concerned industry/market and qualification of the individual.

It is the supplier's responsibility to ensure their employees are not exposed to inhumane treatment including sexual harassment, abuse (physical or mental), corporal punishment, coercion or the threat of these.

7. Management of Risk

Risk should always be managed by the party best able to handle it. Where required market knowledge and research will be used to understand where this should operationally sit. We do not expect our suppliers or ourselves to be responsible for managing a risk that is best suited or appropriate for another party to deal with in the Supply Chain.

All parties should be prepared to share knowledge and intelligence on supply chain risks so that operational risks and material shortages can be mitigated and communicated effectively with employees and customers.

Motion Control Products will work with its suppliers in resolving concerns, or issues arising from such risk, with customers.

8. Health & Safety

Motion Control Products are committed to a safety-first environment and all its employees are aware of who their health and safety representatives are and receive training appropriate for their role. We expect our suppliers to likewise protect their own employees, contractors, visitors and anyone else effected by your activities.

Employees safety must come first at all times. The workplace must not be a place that puts employees at risk and all suppliers are responsible for the training and knowledge sharing in matters of health and safety.

Motion Control Products therefore request and expect all their suppliers to: -

- Ensure that workplaces, machinery, equipment and processes under their control are safe and without risk to health.
- Risk assessments are current and appropriate for the tasks your employees do and carried out by a trained individual
- Any chemical, physical and biological substances and agents are controlled and awareness of any health concerns are addressed.
- Adequate protective clothing and equipment to be provided for all employees. Such items to be appropriate for the role and task they are undertaking.

Safety practices should be promoted to avoid accidents at work. All practices to be communicated to all employees and adequate training provided.

We request that all suppliers have an Emergency Plan ready to be implemented should the need arise.

An emergency plan is: -

- something that can be actioned in the event or situation, where a range of serious consequences require special arrangements to be implemented.
- One or more of its services are unable to deliver a function that places the business at risk.
- A company may further define an incident by a specific type, such as a Business Continuity Incident as well as Major Incident or where Pandemic Planning is required.

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Such a plan will not be used for managing normal environmental pressures and surges to demand/supply chain (unless they would send the company into risk or crisis)

All suppliers to provide this plan upon request.

9. Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking. It is the deprivation of a person's liberty by another to exploit them for personal or commercial gain.

Motion Control Products has a zero tolerance approach to modern slavery and we aim to act ethically and with integrity in all business dealings. We are committed to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

Should a supplier be found to use forced labour or child labour, either knowingly or unknowingly, any business relationship Motion Control Products has with them will be terminated effective immediately. We expect the same high standards from all companies we work with that we hold ourselves.

Should there be any questions raised on a particular supplier, product or service where violations relating to modern slavery and the Modern Slavery Act 2015 could possibly be seen, Motion Control Products will suspend all business dealings immediately until an investigation can occur. We expect supplies to cooperate with any investigation and failure to do so will be detrimental to any future dealings.

We encourage all parties to be aware of all types of modern slavery and if they have suspicions of violations or detrimental treatment of persons that it is reported to all parties immediately.

10. Environment

All suppliers working with motion Control Products must comply with relevant environmental laws and regulations, obtain all necessary permits and properly handle, movement, storage and disposal of hazardous materials and regulated substances.

Motion Control products requires all suppliers to have an effective environmental policy to be produced when requested.

11. Ethics, Bribery and Anti-Corruption

Motion Control Products require all of its suppliers to comply with all applicable legislation related to anti-corruption including any relating to bribery, corruption and extortion.

Bribery will not be offered or accepted by Motion Control Products. Suppliers must adhere to the Bribery Act 2010 and any money-laundering regulations. We expect suppliers to have processes ensuring all in their supply chain comply with these laws.

All business, advertising and competition will be held to high standards, safeguarding customers and confidential information.

Suppliers will: -

- Behave ethically in all business dealings
- Not offer, give or accept anything of value that could be construed or has the effect of influencing a business decision
- Not offer or give gifts or hospitality to any employee that is intended or viewed as intending to effect or influence a business decision.
- To make no payments in the name of Motion Control Products without proper

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authorisation that could be seen to facilitate better relationships, orders, influence or alter decisions

- Comply with all anti-bribery and corruption legislation and laws relevant to countries in which they operate.

All intellectual property rights and business secrets will be respected and upheld including any business secrets, confidential discussions and all communications (verbal or written).

Suppliers to make sure all employees and contractors are aware of their whistleblowing processes and how to report improper conduct. Such processes to protect the whistleblower's anonymity. Suppliers to not prohibit, prevent or deter whistleblowing and not cause any disadvantages for whistleblowing.

12. Continuous Improvement

Motion Control Products prides itself on continually striving for improvement and growth. We expect our suppliers to use recognised practices to deliver goods and services and aim to continuously improve, innovate, bring ideas and expertise that will enhance the working relationship, customer delivery and quality.

13. Conflict of Interest

All suppliers are expected to act fairly, objectively and actively avoid all conflicts of interest when conducting business with Motion Control Products.

Should there be any potential, suspected or actual conflict of interest, suppliers must notify Motion Control Products immediately.

14. Third Part Compliance

Suppliers are responsible for ensuring that items laid out in this document and any agreed as part of contractual terms are adhered to throughout their supply chain, such evidence to be provided should Motion Control Products ask.

15. Corporate Social Responsibility

Motion Control Products will work with their suppliers to ensure, as much as possible, that the company's requirements with regards to policies and procedures are maintained throughout the supply chain. All suppliers, new and old, are subject to assessment and tier ratings and should provide transparency on all aspects within our relationship upon request.

Suppliers should be accountable for their own Corporate Social Responsibility programmes and are encouraged to share these with Motion Control Products. We expect any supplier we work with to ensure their employees are safe, aware of processes as well as maintaining health and safety across their business, abiding by current legislation and prioritising environmental concerns.

Motion Control Products maintain transparency with those we work.

16. Confidentiality

Motion Control Products and its suppliers are expected to comply with the provisions in contracts and any legal requirements to protect commercial and sensitive information. Suppliers working with Motion Control Products may be party to confidential information that is necessary to have an effective relationship, develop projects and innovative concepts.

In certain circumstances Motion Control Products will require a Non-Disclosure Agreement to be signed. If such a document has not been signed, all suppliers are to treat any information provided with the same care as information of a sensitive nature.

Suppliers must recognise that any confidentiality agreements or information will be disclosed,

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should Motion Control Products be compelled to do so, for example, by law.

17. Import Export Controls

Motion Control Products will comply with all applicable laws and regulations controlling the export (and related import) of military and commercial terms, services and technology. It is therefore essential that all suppliers the company has a relationship with are able to demonstrate compliance with export and import laws, directives and regulations governing components, services, technology or technical data.

You, as a Supplier, shall comply with all import and export controls related to your countries regulations and legislation and those you do business in.

Motion Control Products expects you to abide by applicable economic sanctions that your country adopts including any embargos or sanctioned countries and controlled products. Motion Control Products reserves the right to stop trading with any Supplier who is seen to be breaking any controls set in place.

18. Conflict Materials

Suppliers must comply with applicable laws and regulations regarding conflict minerals including tin, tungsten, tantalum and gold. Suppliers processes must assure that any conflict minerals contained in products bought by Motion Control products do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Suppliers are expected to do their own due diligence on their sources and supply chain in accordance with international standards and make such information available upon request.

19. REACH, RoHS and other Requested Documentation

Motion Control Products, may at time to time, request evidence from suppliers supporting REACH and RoHs, alongside any other fair and reasonable documentation that is required to support their quality control business systems. Suppliers must ensure that they have observed due diligence and local and international legislation in relation to these matters. Should you, the Supplier, believe that you are unable to provide such information and documentation on request for products supplied to Motion Control Products, you must bring this to the attention of the Quality Representative at our company.

Motion Control Products reserves the right to request such documentation be brought up to date and recorded where necessary and the Supplier is responsible for all costs associated with this as it is part of your own due diligence work.

Motion Control Products reserves the right to hold, prevent or cancel any work, projects and orders with a Supplier if documentation is not available without good reason or timeframe given.

20. Maintain Accurate Records

Suppliers must maintain accurate records in relation to their relationship with Motion Control Products. Such records to comply with statutory requirements and data protection laws.

21. Violations and Consequences

This Supplier Code of Conduct is intended to set out the way in which suppliers and Motion Control Products will behave with each other. It is not designed to undermine contracts or legal compliance, or bypass rules and terms set out when Motion Control Products purchases goods from its suppliers.

This code of conduct does not take precedence where courts or other institutions such as a regulatory agency, authority or body have jurisdiction.

If Motion Control Products provides a supplier with facts that could lead to a verifiable

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suspicion on breach on any section of this document, the supplier must present facts and explanations in defence that a breach has not occurred. If the supplier does not provide such information, within a reasonable timeline outlined in such notification of suspicion of breach, Motion Control Products are entitled to: -

- Terminate any existing contracts with immediate effect by written notice of termination where it is not inappropriate to do so
- Request, irrespective of proof of damages, a compensation for expenses with respect to investigations regarding the breach
- Claim for damages

22. Monitoring

Motion Control Products reserve the right to monitor that the clauses in this Code of Conduct are complied with.

Motion Control Products has the right to request information and evidence relating to such compliance with the clauses contained in this document and any other contractual terms agreed separately.

Periodically questionnaires or requests for information may be made to suppliers.