

# Supplier & Sub-Contractor Code of Conduct

## Document Control Sheet

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### DOCUMENT PREPARATION AND REVIEW

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## 1. Introduction

Suir Engineering is committed to the highest standards of legal, ethical, product quality, safety and business integrity. We want to ensure that working conditions in our supply chain are safe, that workers are treated with respect and dignity, and that our manufacturing processes are environmentally friendly and safe. This Supplier and Subcontractor Code of Conduct defines the basic requirements placed on our suppliers of goods and services concerning their responsibilities towards their stakeholders and the environment.

The term 'Supplier and Subcontractor' used in this code refers to suppliers, subcontractors, vendors, contractors, consultants, agents and other providers of goods and services who do or seek to do business with Suir Engineering.

Suppliers are expected to apply similar levels of compliance to their own suppliers or approved sub-contractors with whom they work to supply goods and services to Suir Engineering.

## 2. Supplier Requirements

**The Supplier agrees herewith to:**

### 2.1 Governance & Compliance

- comply with all applicable laws and regulations, including money laundering legislation, in the countries in which they operate;
- not offer any illegal payments to, or receive any illegal payments from, any client, supplier, subcontractor, their agents, representatives or others;
- not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so;
- not fix prices or exchange pricing information with competitors;
- comply with competition and anti-corruption laws, directives and regulations that govern operations in the countries in which they do business;
- develop, implement and maintain methods and processes appropriate to its products and services to minimize the risk of introducing counterfeit parts and materials into deliverable products;
- establish effective processes to detect counterfeit parts and materials and, if detected, quarantine the materials and notify the OEM customer and/or law enforcement as appropriate;
- accurately record, maintain and report business documentation including, but not limited to, financial accounts, quality reports, time recording, expense reports and submissions to customers and regulatory authorities, when appropriate;
- avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest.

### 2.2 Labour and Human Rights

- pay workers at least the minimum compensation required by local law and provide all legally mandated benefits;
- ensure working time practices in compliance with national and local requirements;
- ensure workers are fully registered to work in countries in which they operate;

- adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the countries in which they operate;
- prohibit all forms of child labour;
- ensure appropriate policies are in place regarding fair and respectful treatment of all employees regarding working conditions without fear or harassment, intimidation, interference or reprisal;
- have appropriately documented grievance procedures which are made available to all employees.

## **2.3 Health and Safety**

- take responsibility for the health and safety of its employees, contractors and visitors whilst working on sites;
- provide training and ensure that employees are educated in health and safety issues;
- ensure that employees or contractors have adequate health and safety information and training before commencing work on site;
- control hazards and take the best reasonably possible precautionary measures against accidents and occupational diseases and avoid using materials that may be harmful to the health of employees and others whilst on sites;
- comply with all applicable health, safety and welfare at work legislation and regulations which is relevant to the works.

## **2.4 Environment**

- act in compliance with the applicable statutory and international standards of environmental protection;
- minimize environmental pollution and make continuous improvements in environmental protection;
- avoid or continuously reduce all forms of waste.

## **2.5 Sustainability**

- be conscious of their carbon footprint and the impact their business has on the environment;
- monitor their carbon emissions in Scope 1, 2 & 3;
- identify decarbonising initiatives and procure raw material in the most environmentally friendly way as possible.

## **2.6 Information and Data Protection**

- adhere to all local privacy and data protection laws;
- process information in a fair, lawful and transparent manner and ensure information is only used for the business purpose for which it was provided;
- ensure the integrity and confidentiality of information;
- provide clear and accurate notices when collecting or processing personal data and have a retention schedule to ensure personal information is not retained longer than is necessary;
- comply with all applicable laws governing intellectual property rights assertions, including protection against disclosure, patents, copyrights and trademarks.

## 2.7 Cyber Security

- implement practical security measures;
- continuously review and update their security measures;
- conduct phishing and cyber security awareness and training for their staff;
- notify Suir Engineering immediately of any cyber threat to which Suir may be at risk;
- cooperate fully during any investigation surrounding cyber security threats;
- be proactive in addressing any identified weakness they may experience.

## 2.8 Supply Chain

- use reasonable efforts to promote compliance with this Code of Conduct among its suppliers;
- comply with the principles of non-discrimination with regard to supplier selection and treatment

## 3 Code Violations and Reporting

- Suir reserves the right to terminate a contract with any supplier or subcontractor who violates this Code. Suir will also ensure any supplier and subcontractor in breach of this Code will be excluded from any future tendering process with Suir.
- Where a member of our supply chain poses a threat to the security of our technical infrastructure, we reserve the right to fully block all correspondence to and from this supplier and subcontractor while a formal investigation is undertaken. Suppliers and subcontractors who do not take this process seriously or who do not cooperate to the fullest extent during investigations may be deemed in violation of this Code.
- Suir are committed to upholding the highest legal, ethical and moral standards and we expect the same level of commitment to these values from our supply chain and we strongly encourage the reporting of any illegal conduct or violations of this Code by Suir employees or Suppliers and Subcontractors, either directly with senior Suir management or in the strictest of confidence through our Compliance Manager ([compliance@suireng.ie](mailto:compliance@suireng.ie)).