

## Supplier Code of Conduct

Sanko Gosei is committed to maintaining a responsibly sourced supply chain. Suppliers to Sanko Gosei must adhere to principles that cover human rights, labour, the environment and anti-corruption.

Social responsibility is an essential aspect of maintaining a truly sustainable business and we expect all our suppliers to adhere to the following principles.

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### *Modern Slavery and Human Trafficking*

Modern slavery encompasses slavery, servitude, human trafficking and forced labour. Sanko Gosei UK LTD has a zero-tolerance approach to any form of modern slavery. We are committed to acting ethically and with integrity and transparency in all business dealings and to putting effective systems and controls in place to safeguard against any form of modern slavery taking place within the business or our supply chain.

We require our suppliers to:

- Take steps to eradicate modern slavery within their business
- Hold their own suppliers to account over modern slavery
- For UK based Suppliers, pay their employees at least the national minimum wage.
- For international suppliers, pay their employees any prevailing minimum wage applicable within their country of operations

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### *Young workers/child labour*

Child labour must not be used anywhere in the supplier's process or supply chain. "Child" refers to anyone under the local minimum working age. The supplier must comply with local laws.

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### *Working Conditions*

Suppliers must maintain and continually improve a safe working environment for their employees that complies with national legislation.

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### *Working hours*

Working hours must not exceed the maximum set by local law, or should not exceed more than 60 hours a week, including overtime, except in emergency or unusual situations. Workers must be allowed at least 1 day off every seven days.

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### *Harassment and Humane Treatment*

Workers must not be subjected to any harsh or inhumane treatment, including sexual, harassment, sexual abuse, mental or physical coercion or verbal abuse.

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### *Discrimination*

The supplier must not discriminate based on race, age, colour, gender, sexual orientation, gender identity, ethnicity, disability, pregnancy, religion etc. This applies to hiring and employment practices such as wages, promotions, rewards etc.

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### *Freedom of association*

Suppliers must respect the right of workers to form and join trade unions in conformance with local law. In addition, workers must be able to communicate openly and discuss ideas or concerns with management regarding working conditions and practices without fear of discrimination, reprisal, intimidation or harassment.

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### *Health and Safety*

Suppliers are obliged to provide a safe working environment in conformance with local laws. At minimum, a Health and Safety Policy must be available and communicated to all workers. Certification to ISO45001 is preferred, and demonstrates the supplier's commitment to the health and safety of its workers.

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### *Environment*

Suppliers to Sanko Gosei must comply with all applicable environmental laws and regulations.

Sanko Gosei encourages suppliers to take a proactive approach to environmental issues and focus on reduction of waste, reduction of greenhouse gas emissions and development of environmentally friendly products and technologies. Certification to ISO14001 is preferred. The supplier's environmental policy should cover the following items: Energy consumption and greenhouse gas emissions, water consumption and quality, air quality, natural resources and waste reduction.

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### *Corruption and Bribery*

It is our policy to conduct all of our business in an honest and ethical manner. We take a zero-tolerance approach to Bribery and Corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery.

We will uphold all laws relevant to countering bribery and corruption in all the areas in which we operate.

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### *Disclosure of information*

All business must be conducted transparently and accurately reflected on the supplier's records. Information relating to labour, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and industry practices. Falsification of records is unacceptable.

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### *Privacy*

Suppliers must commit to protecting the privacy expectations of personal information everyone they do business with, including suppliers, customers and workers, in conformance with applicable data protection and information security laws.

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### *Intellectual property*

Intellectual property rights are to be respected at all times. Customer and supplier information is to be protected. This includes taking adequate measures to safeguard against cyber-attacks.

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### *Antitrust*

Suppliers will comply with all applicable antitrust laws and will not engage in conduct that limits free and fair competition. Examples of such inappropriate conduct with competitors includes fixing prices, allocating markets, limiting production, coordinating bidding or boycotting certain suppliers or customers.

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*Conflict Minerals*

Sanko Gosei supports the aims and objectives of the U.S. legislation on the supply of “conflict minerals” as defined by the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010.

We will not knowingly purchase materials specified as “conflict minerals” that are not certified as “conflict free”.

Our suppliers are requested to undertake due diligence with their own supply chains to assure the same.

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*Counterfeit Parts*

Sanko Gosei supports the production, sale and procurement of high quality, OEM components that satisfy customer requirements and provide the highest standard of safety and reliability. Suppliers are expected to support this, and must not knowingly sell or source any counterfeit parts. Suppliers must take steps to evaluate their own specification and purchasing processes to avoid procurement of counterfeit parts and prevent sub-standard components entering the supply chain.