



Supplier Code of Conduct

- NYL-PUR-POL-02 Rev 02



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1.0 Introduction

- As one of world's leading manufacturers of polymer solutions, Nylacast Engineered Products Ltd (NEPL) has developed a reputation within global manufacturing, for helping clients gain competitive advantage through high precision engineered parts, offering a full-service solution from design to development. Our dedicated and knowledgeable team works hard to establish the most efficient and effective way to support customers, to maximise quality whilst minimising cost.
- We seek to be class leading in our dealings with customers, suppliers and our employees. This Supplier Code of Conduct (the "Code") sets out the minimum standards of behaviour and practices we require from our suppliers. We expect our suppliers to adhere to this Code in addition to the provisions of any Terms and Conditions agreed between NEPL and the supplier.
- In order to do business together, we expect our suppliers to be ethical, responsible, sustainable and to fully comply with all applicable laws and regulations.
- NEPL has a core set of values 'STRIVE', which are detailed and explained further in figure 1.
- As a supplier of NEPL, we ask of your support and that of your own supply chains to ensure these core values are achieved.
- We continuously monitor our suppliers as part of our Vendor Assessment Rating (VAR) and adherence to this Code will be linked with your scoring.



Figure 1: STRIVE Values

Purpose, Scope & Applicability

2.0 Purpose

- This Supplier Code of Conduct specifies the minimum standards of behaviour that NEPL requires of our suppliers.
- The purpose of this document is to communicate NEPL's expectations to the global supply chain.
- Within this document you will find information detailing what our suppliers are required to adhere and comply with.
- We will support our supply chain in ensuring it is able to implement these standards, and we will work collaboratively to ensure that every part of this policy is implemented within a supplier's procedure (where practicable).

3.0 Scope & Applicability

- This Supplier Code of Conduct is applicable to all suppliers and partners who supply products or services related to NEPL purchase orders.
- Suppliers are expected to cascade these standards to their own suppliers in order to ensure alignment across the supply chain.
- We expect our suppliers to adhere to this Code in addition to the provisions of any Terms and Conditions agreed between NEPL and the supplier.

4.0 Legal & Regulatory Compliance

- Suppliers are expected to comply with all applicable local, national & international laws and regulations, and NEPL policies that apply to their line of business, wherever business is conducted.

5.0 Health & Safety

- All suppliers must make proper provision for the health, safety and welfare of their employees, contractors and visitors i.e ensuring all facilities meet safety standards, providing necessary safety equipment and training, and implementing emergency preparedness plans.
- We expect suppliers to comply with legal and industry Health & Safety requirements and seek to implement best practice in their industries.
- The Health & Safety of its employees is a NEPL core value, and that value extends to the employees of its suppliers, and sub-suppliers. Thus, suppliers agree to follow all applicable Health & Safety laws, regulations, and policies at all their work locations.
- All suppliers are expected to be committed to managing H&S risks and to proactively protect the health, safety and welfare of their employees, contractors and visitors, and those in the community who may be affected by their activities.
- We actively encourage our global suppliers to adopt a health and safety management system: for example, ISO 45001 or equivalent.
- Suppliers agree to support the elimination of materials and methods that pose health risks (or hazards).

6.0 Sustainability & Environment

- We expect suppliers to comply with legal and industry requirements and seek to implement best practice in their industries.
- The Health & Safety of employees is a NEPL core value, and that value extends to the employees of its suppliers, and sub-suppliers. Thus, suppliers agree to follow all applicable Health & Safety laws, regulations, and policies at all their work locations.
- All suppliers are expected to be committed to managing environmental risks and to proactively protect the health, safety and welfare of their employees, contractors and visitors, and those in the community who may be affected by their activities.
- As a supplier to NEPL it is expected that you demonstrate compliance with the minimum standard of environmental practices, applicable laws, and regulations. We actively encourage our global suppliers to hold ISO 14001 certification or an equivalent environmental standard for your country of origin.
- Suppliers agree to join NEPL in our dedication to the protection of human health, natural resources, and the global environment, not only by complying with the law, but also by integrating sound environmental practices into their business decisions. Suppliers' systems should aim to restore and preserve the environment by:
 - reducing waste, emissions and pollutants
 - using resources efficiently
 - Implementing sustainable practices
 - recycling materials at every stage of the product life cycle.
- Suppliers agree to support the elimination of materials and methods that pose environmental and health risks (or hazards) and agree to work to minimise the impact of their operations and that of their suppliers on the environment. Also, supplier management systems should continually assess and seek to reduce the adverse impact of their facilities and products on the environment and on the communities in which their company operates.

7.0 Supplier Diversity

- As part of our Sustainable Procurement activities, NEPL encourages Supplier Diversity to create a fair and inclusive procurement process.
- Our intention on Supplier Diversity is to ensure that all businesses, regardless of their size, location, and the background of their workforce, have the same opportunities to compete for the supply of goods and services to NEPL.
- Competitive advantage can be facilitated by having a diverse supply chain, as it can support the identification of new Suppliers that can help us unlock and deliver competitive advantage through Innovation, Flexibility, Agility and Competitiveness.
- Our procurement process strives to acquire goods and services that meet our quality, cost, delivery/service, innovation, risk and sustainability standards, and this criteria must continue to be delivered by all suppliers.
- Supplier Diversity is not about positive discrimination; it is about providing a platform of opportunity for businesses to become part of NEPL's supply chain.

8.0 Labour Practices

8.1 Hiring

- Suppliers agree to recruit, select, and develop employees based on merit, without regard to race, colour, religion, national origin, gender, gender identify, sexual orientation, age, marriage or civil partnership, pregnancy or maternity, military status, disability, or any other characteristic protected by law.

8.2 Child Labour

- Suppliers must not employ workers under the legal minimum age for employment. Suppliers must comply with all applicable child labour laws.

8.3 Forced Labour

- Suppliers must not use any form of forced, bonded, or indentured labour.

8.4 Working Hours

- Suppliers must comply with applicable laws regarding working hours, overtime, and rest periods.

8.5 Wages and Benefits

- Suppliers must pay workers at least the minimum wage required by law and provide all legally mandated benefits.

8.6 Discrimination & Harassment

Suppliers must provide a workplace free of harassment and discrimination based on race, colour, religion, national origin, gender, gender identify, sexual orientation, age, marriage or civil partnership, pregnancy or maternity, military status, disability, or any other characteristic protected by law. Harassment or discrimination towards employees, including all forms of physical, verbal or psychological abuse must not be tolerated.

8.7 Slavery and Human Trafficking

- Suppliers must ensure they have taken steps to ensure their business operations are free from slavery and human trafficking practices, both internally and within their supply chains.



9.0 Operating Ethically

At NEPL, we treat all our customers, suppliers and partners with fairness and honesty. We expect suppliers to demonstrate these same behaviours and will only engage with suppliers whose values and behaviours meet high ethical standards.

High standards of ethical behaviour and compliance with laws and regulations are essential to protecting the reputation and long-term success of our business. As such, we expect suppliers to behave ethically, to comply with legal and industry requirements and seek to implement best practices in their industries.

9.1 Customers, Suppliers & Partners

- Suppliers must only engage with employees, agents, consultants, representatives, distributors, contractors, suppliers and joint venture partners who meet ours and your standards regarding reputation and conduct.

9.2 Conflicts of Interest

- Suppliers must conduct business free from conflicts of interest or mitigate appropriately any such conflicts if they arise.

9.3 Anti-Bribery & Corruption

- Suppliers must conduct business honestly, fairly and free from any bribery or corruption. Suppliers agree to comply with the UK Bribery Act, the U.S. Foreign Corrupt Practices Act, and other applicable anti-corruption laws wherever they do business.
- Neither suppliers nor any of their suppliers, sub-contractors or agents will directly or indirectly provide or offer to provide anything of value to or for the benefit of, any government official to obtain or retain any contract, business opportunity or other benefit, or to influence any act or decision of that person in his/her/their official capacity.
- Suppliers to NEPL must only offer gifts or hospitality in an open and transparent way and your gifts or hospitality must never be illegal. Where gifts or hospitality are offered, these should not be intended or interpreted as an attempt to improperly influence business.
- Suppliers agree to have reasonable procedures to inform and train their employees to promote compliance with these laws.
- The Nylacast Anti-Bribery & Corruption Policy is available at www.nylacast.com

9.0 Operating Ethically (continued)

9.4 Compete Fairly

- Everyone benefits from fair, free, and open markets, and NEPL works to outperform its competition fairly and honestly.
- Suppliers agree to compete strictly on the merits of their products and services and make no attempts to restrain or limit trade in violation of applicable antitrust or competition laws.

9.5 Trade Restrictions & Controls

- Suppliers agree to comply with the applicable legal licensing requirement and restrictions on exports and trade dealing, including bans on exports to a prohibited country, bans on imports from, or dealings in property originating in, a sanctioned country, travel to or from a sanctioned country, investments in a sanctioned country, or financial transactions and dealings involving a sanctioned country or designated individuals and entities.
- Suppliers must implement policies that include the prevention, detection, and risk mitigation of counterfeit materials / products. In the event a supplier becomes aware or suspects that counterfeit products have been used, they must notify NEPL immediately.

9.6 Conflict Minerals

- As part of our Supplier Code of Conduct we specifically request that all suppliers agree to the responsible sourcing of raw materials and agree to comply with regulations that may apply to their business regarding the exploitation and trade of minerals originating in conflict affected and high-risk areas. “Conflict Minerals” is a name given to minerals which sometimes finance armed conflict or are mined using forced labour.
- Suppliers must provide NEPL with products made from materials, including constituent materials that are sourced responsibly and verified as ‘conflict free’ in accordance with The Organisation for Economic Co-operation and Development guidelines.
- Suppliers must provide NEPL with supporting data on their supply chain of minerals when requested. If the material supplied is indeterminable or otherwise unknown, the supplier must commit to either attaining the appropriate certifications or to commit to the phase out of that material.

10.0 Other

10.1 Business Records

Suppliers must ensure they control documentation and records relating to NEPL product and ensure they comply with the following requirements:

- Suppliers must provide access to documentation / records upon request.
- All documents / records are retained until NEPL gives instruction to dispose in writing.
- All documents are retrievable on request within 48 hours.
- All documents are written in the English language or dual language.
- Ensure that all documents / records are suitably stored to prevent unauthorised or fraudulent use.

10.0 Other

10.2 Data Protection

- Suppliers shall always be aware of and comply with UK data protection law and GDPR requirements, plus any other applicable local, national or international regulations, in relation to the handling or processing of any data. In particular, when handling any personal, sensitive or otherwise confidential data on behalf of NEPL.
- Suppliers must ensure that the use of artificial intelligence (AI) and AI systems must comply with applicable laws, regulations and best practice – including but not limited to data protection, privacy and intellectual property.
- The Nylacast Data Protection Policy is available at www.nylacast.com

10.0 Other (continued)

10.3 Right to Audit

- NEPL reserves the right to audit supplier's premises to confirm compliance with this Supplier Code of Conduct.

10.4 Compliance

- Suppliers agree to have management processes that:
 - Ensure that management is accountable for compliance, performing audits to the Supplier Code of Conduct and agreements with NEPL, and comply with laws and regulations that apply to their activities.
 - Require risk assessments and implement risk management systems to mitigate the environmental, health and safety, and labour practice risks related to their activities. Supplier shall provide supporting documentation when requested by NEPL.
 - Ensure the integrity of financial reports and information in accordance with applicable generally accepted standards.
 - Provide communication channels that allow employees to report concerns or unethical practices within the supplier organisation.
 - Design and oversee policies for the ethical conduct of business within their organisation, including without limitation for gifts and gratuities, conflicts of interest, policies against commercial bribery or bribery of government officials, respect of intellectual property, and others. Ideally suppliers will have their own Supplier Code of Conduct incorporating the above and provide supporting documentation when requested by NEPL.
 - Cascade the requirements of this Supplier Code of Conduct down to their suppliers and require them to cascade down to their supply chain. Suppliers should apply the same obligations to the contractors working on their production sites, including labour agencies.
 - Promote the well-being of the communities in which business is done.



10.0 Other (continued)

10.5 Reporting & Monitoring

- NEPL continuously applies our Supplier Code of Conduct and adheres to our purpose and scope, to maintain the highest ethical standards. It encourages our employees and suppliers to report any activity of which they have knowledge that suggests a violation of the law, our Code of Conduct, or that is inconsistent with ethical business practices.
- NEPL expects to be informed by a supplier in any instance of violation of this Supplier Code of Conduct, relating to the supply of goods or services provided.
- Any supplier that in good faith raises a concern or reports misconduct is doing the right thing, and NEPL will not tolerate retaliation against such supplier.

11.0 Continuous Improvement

11.0 Continuous Improvement

- Suppliers are expected to continuously improve their performance in general and by implementing appropriate measures to help them comply the various standards required by this Code.
- Suppliers shall have a process for timely correction of deficiencies identified by assessments, inspections, investigations and reviews undertaken by themselves or other third-parties.

12.0 Supplier Code of Conduct Declaration

The Supplier acknowledges and agrees to comply with the Nylacast Engineered Products Ltd (NEPL) Supplier Code of Conduct.

Supplier Details

- Company Name: _____
- Company Address: _____
- Contact Name: _____
- Contact Title: _____
- Contact Email: _____
- Contact Signature: _____
- Signature Date: _____

13.0 Revision History

Date	Rev. No.	Revision by	Description of change
31/07/23	01	Caroline Moxley	First issue of the Policy
16/12/24	02	Ben Hambleton	New format and rewrite



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