



Group Policies

Supplier Code of Conduct

Issued by: Bodycote plc Group General Counsel

Issue 1 / September 2021

Bodycote's Core Values are incorporated within this Supplier Code of Conduct ("Supplier Code"). All suppliers are required to comply with this Supplier Code in order to provide products or services to Bodycote. We request our suppliers to communicate our Core Values and the principles of this Supplier Code to their employees and their own suppliers.

Suppliers must ensure that appropriate documentation is kept to demonstrate compliance with this Supplier Code and must provide us with access to that documentation upon request.

1. Legal Compliance

All suppliers must comply with any and all applicable laws, rules and legal regulations in the countries in which we and they operate.

We expect our suppliers to ensure that their business practices are in accordance with all applicable laws and regulations governing the export and import of domestic and foreign object parts and components and related technical data. Suppliers are expected to inform Bodycote of any specific sanctions or export controls that relate to their supplies to Bodycote.

2. Sustainability and Environmental Responsibility

As a world-leading provider of heat treatment and thermal processing services with operations around the globe, we are in a position to positively contribute to improved standards of environmental protection and sustainable business practices.

Our commitment is to reduce the direct impacts of our operations, and to provide more sustainable solutions for our customers. We aim to ensure a sustainable future for our business, and for the communities in which we operate.

We are committed to:

- Leading our sector in delivering global environmental excellence in our operations.
- Reducing our carbon emissions and preventing pollution.
- Ensuring all our operations fulfill our compliance obligations.
- Striving for the highest standards of energy management in our operations.
- Investing in new technologies that reduce emissions.
- Working with the communities in which we operate to eliminate any adverse impacts from our operations.
- Regularly reviewing our progress against our commitments at all levels of the business to ensure the delivery of continuous environmental improvement.

We expect all our suppliers to:



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- Take action to prevent pollution and environmental degradation.
- Take action to minimise the use of natural resources, including energy.
- Comply with all applicable environmental legislation.
- Implement and maintain an appropriate environmental management system which is at least comparable to the ISO14001 standard, ideally with third-party certification.
- Support Bodycote's own implementation and maintenance of the ISO14001 standard.
- Manage hazardous material in line with applicable laws, regulations, standards and best practices.
- Train employees and provide the necessary resources to make them aware of their personal environmental responsibilities in protecting the environment.
- Design production and supply chain processes to ensure efficient use of resources and to minimise environmental impact.
- Promote greater environmental responsibility and the development and diffusion of environmentally sound technologies.
- Be responsible for managing and reducing the environmental impacts of outsourced processes and services.
- Be able to demonstrate the benefits of their activity to manage and reduce environmental impacts.

3. Social Standards

We believe all people have a right to life, personal liberty, personal security and to be treated with dignity and respect.

We are committed to maintaining an ethical and transparent supply chain free of all types of modern slavery and human trafficking. It is the right of all people to receive fair, equal and non-discriminatory consideration in access to, and the processes of, employment.

We take the health and safety of our employees, visitors, contractors, customers and suppliers very seriously. We believe this is something we all have to play a part in - it is our legal and moral responsibility to take care of ourselves and others.

We expect all our suppliers to:

- Guarantee an individual's free choice of employment.
- Respect employee freedom of association and the right to collective bargaining.
- Not use child labour – the minimum age for admission to employment should not be less than the age of completion of compulsory schooling and never be less than 15 years. Hazardous work may not be done by anyone below the age of 18.



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- Not to discriminate on the basis of race, colour, sex, religion, political opinion, national extraction or social origin.
- Ensure working hours are not excessive.
- Provide working conditions that are safe and hygienic.
- Not allow harsh or inhumane treatment.
- Pay the legal minimum wage.
- Only employ individuals with the legal authorisation to work.

4. Ethical Business Practices

Our corporate conduct is based on our commitment to act honestly and transparently, with respect and responsibility. It is better to miss out on business or incur additional costs than be involved in corrupt practices.

5. Bribery and Corruption

We have a zero tolerance of bribery and corruption.

We do not tolerate any form of bribery and corruption and we require the officers and employees of all Bodycote Group companies and of all associated persons (including our dealers, suppliers and agents) to act in line with this principle.

Bodycote will not offer, give or receive, either directly or through any third party, any financial or other advantage to obtain new business, retain existing business or secure any other improper advantage and we will not permit others to do so.

We expect all our suppliers to:

- Never carry out and actively prevent the offering, promising or giving and the requesting, agreeing to receive or accepting of anything that could be construed as a bribe by any person associated with them (a "bribe" being an offer or receipt of something of value as an inducement or reward for improper performance or acting not in good faith or with impartiality in connection with a function or activity. Any local custom or practice is to be disregarded unless permitted or required by the written law of the country or territory concerned).
- Prevent the payment of facilitation or 'grease' payments made to secure or speed up routine actions where these are not permitted by the written law of the territory in question and only make such payments where a formal receipt or written confirmation of its legality can be obtained. If, however, the demand is accompanied by immediate threat of physical harm then safety should always be a priority.
- Promote honesty and integrity in their business conduct including through training of staff.



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- Never conceal or fail to record accurately and completely the true nature of its activities as a supplier to us.
 - Never pursue business that requires them or us to engage in unethical or illegal activity including extortion, fraud, deception, collusion, cartels, theft and money laundering.
 - Notify us immediately of any incidents of bribery and any suspicions about bribery and corruption that relate to Bodycote business, including:
 - if they become aware that any of the supplier's directors, officers or employees have a relationship with any Bodycote representative, that could result in a conflict of interest.
 - if they consider any demands or requests received from any Bodycote representative to be improper or inappropriate.
 - if any request for a facilitation payment is made.
 - if they become aware that any of the supplier's directors, officers or employees act in the capacity of a Public Official where this could be relevant to their relationship with us.

We prohibit the offer or receipt of gifts, hospitality or expenses whenever they could affect or be perceived to affect the outcome of a business transaction (where a common sense approach should be applied with rejection in the cases of any doubt). Promotional expenditures of this type are only considered legitimate where they are open and transparent, proportionate, reasonable, accords with general business practice and are made in good faith for a legitimate business purpose and not where they place the recipient under any obligation or create any expectation in the giver. Cash gifts, regardless of value, will never be accepted.

6. Competition and Anti-Trust Compliance

Fair competition is vital to our success and we will not enter into any anti-competitive business practices with our suppliers.

We expect all our suppliers to:

- Promote vigorous, open, honest and fair competition and to conduct business in accordance with all applicable anti-competition or anti-trust law and regulations.
- Prohibit any actions that falsify or distort free competition or market access and not be involved in any anti-competitive understandings or agreements including improper exchange of competitive information; price fixing; bid rigging or improper market allocation.

7. Confidentiality

A respect for confidentiality builds and develops trust. It allows for the free flow of information and enables a successful collaborative partnership.

We expect all our suppliers to:



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- Ensure that confidential business information or trade secrets gained by virtue of the business activities with us is held in strict confidence and not improperly used or disclosed to third parties.
- Protect confidential information against improper disclosure when it is received, stored, transmitted or disposed of.
- Protect and secure our intellectual property.
- Restrict access to confidential information on a need-to-know basis.
- Raise any concerns regarding disclosure with us prior to releasing information to third parties.
- Not use the Bodycote brand in their promotional or business activities without obtaining prior written permission from us.
- Upon request, return any information or data shared by Bodycote and not to keep any local copies.

8. Audit and Termination of Agreements

Bodycote reserves the right to verify a supplier's compliance with this Supplier Code. Where a supplier review or audit identifies areas of non-compliance, the supplier must implement time-bound corrective actions to lead to compliance.

Bodycote reserves the right to terminate an agreement with any supplier that does not comply with this Supplier Code.

If you have any further questions please contact the Group General Counsel at Bodycote plc registered office +44 (0)1625 505300.