



## Supplier Code of Conduct

With Wrightfield and Wrightform having customers, suppliers based across the world, we accept that we have a duty to trade responsibly.

We therefore want to ensure that those people with whom we deal with and our suppliers live up to our values and standards and share that responsibility.

Accordingly, suppliers should comply with and seek to develop relationships with their own supply chains consistent with the principles set out below and should be compliant with all local and national laws and regulations and the following principles as a minimum.

### Employment Standards

Wrightfield and Wrightform expects suppliers to develop constructive relationships with employees and employee representatives and to recognize the rights of individuals to join trade unions or not.

Suppliers are expected to observe the legislation in each country regarding collective representation.

Suppliers should aim to provide equality of opportunity and treatment regardless of race, colour, gender, religion, nationality, sexual orientation, age, or disability.

Suppliers are expected to support equal pay for work of equal value.

Suppliers must oppose discrimination or intimidation towards employees including all forms of threats of physical and psychological abuse.

As a minimum Wrightfield and Wrightform expects suppliers to comply with all national regulation on pay and benefits. These should be meet basic needs of workers and their families.

Wrightfield and Wrightform suppliers working hours are expected to comply with national laws and regulations. Employees should have annual leave provision and be permitted at least one non-working day per seven days on average.

Wrightfield and Wrightform suppliers are to ensure there is no forced, bonded, or involuntary prison labour. Workers are not required to lodge 'deposits' or their identity papers with their employer and are free to leave their employer after reasonable notice.

Wrightfield and Wrightform is opposed to the use of any form of Child Labour or practices that inhibit the development of children. Suppliers must comply with all child labour laws and should not employ anyone under the age of 15, or where it is higher, the mandatory school leaving age in the local country.

## **Health, Safety and Environment**

Wrightfield and Wrightform suppliers will make proper provision to provide a safe and hygienic working environment, bearing in mind the prevailing knowledge of the industry and of any special hazards. Adequate measures shall be taken to prevent accidents and injury to health arising out of associated with, or occurring during work, by minimizing, so far as reasonably practicable, the causes of hazards inherent in the working environment.

Workers shall receive regular and recorded health & safety training and such training shall be repeated for new or reassigned workers.

Access to clean toilet facilities and potable water, and, if appropriate, sanitary facilities. Food storage shall be provided. Accommodation, where provided, shall be clean, safe and meet basic needs of the workers.

The supplier observing the code shall assign responsibility for health and safety to a senior management representative.

Suppliers will care for the environment through a commitment to good environmental practices.

## **Ethical Dealings**

Suppliers to Wrightfield and Wrightform must not offer gifts or favours to Wrightfield or Wrightform employees that maybe seen as an attempt to influence business decisions. Suppliers, representatives, and their employees must comply with all applicable anti-bribery and corruption laws. If no such anti-bribery or corruption laws apply or are of a lesser standard to that prescribed in the UK Bribery Act 2010, suppliers, representatives and their employees must adhere to the UK Bribery Act 2010.

## **Proprietary Information**

Any information you receive through business dealings with Wrightfield and Wrightform must be kept confidential and never used for illegal purposes or for personal gain, shared with any other customer/supplier. This includes both commercial and technical information. False information must not be given during commercial negotiations.

## **Monitoring/Record keeping**

Suppliers must ensure that documentation is kept demonstrating compliance with the Wrightfield and Wrightform Code of Conduct and must provide access to that documentation upon request from Wrightfield or Wrightform.

## **Conflict Minerals**

Wrightfield and Wrightform support ending the violence & human rights violations in the mining of certain minerals from a location described as the “Conflict Region”, which is situated in the eastern portion of the Democratic Republic of the Congo (DCR) & surrounding countries.

On August 22, 2012, the Securities & Exchange Commission (SEC) published final regulations implementing The “Conflict Minerals” reporting obligations under section 1502 of the Dodd-Frank Wall Street Reform & Consumer Protection Act. The Dodd-Frank Act requires that all publicly traded companies subject to SEC rules report annually on the presence of certain minerals, characterized as conflict minerals, including tin, tantalum, tungsten, or gold (3TG), in the products they manufacture or contract to manufacture & demonstrate the proper level of due diligence in determining whether these minerals originated from the Democratic Republic of the Congo (DCR) or an adjoining country.

Wrightfield and Wrightform is committed to the responsible sourcing of minerals throughout our supply chain. The companies’ themselves are not subject to the rules & reporting requirements of the Securities & Exchange Commission of the United States of America. Where our customers are required to comply with the “Conflict Minerals” reporting requirements, we are committed to ensuring that our suppliers support our efforts, by conducting reasonable country of origin enquiries, to meet these requirements. In such circumstances we only source materials from confirmed “conflict free” sources.

## **Supplier Selection**

Wrightfield and Wrightform expects suppliers to comply with the principles in this Code of Conduct. Suppliers should disseminate these values throughout their own supply chain and then incorporate them as part or routine improvement activities.