

spectris



Global Supplier Code of Conduct

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Our Values

We are committed to maintaining the highest ethical standards and behaviours. Our Values are important to us, underpinning how we act and behave in everything we do. These core characteristics connect our business, the people who work for us and our suppliers. We believe that they are not rules to follow, but a way of living, both at work and outside of work.

Our Values are as follows:



Be True:

We believe in absolute integrity.

- We do the right things in the right way.
- We speak up when something isn't right.
- We show care and respect for each other.



Own It:

We believe in teamwork and keeping our promises.

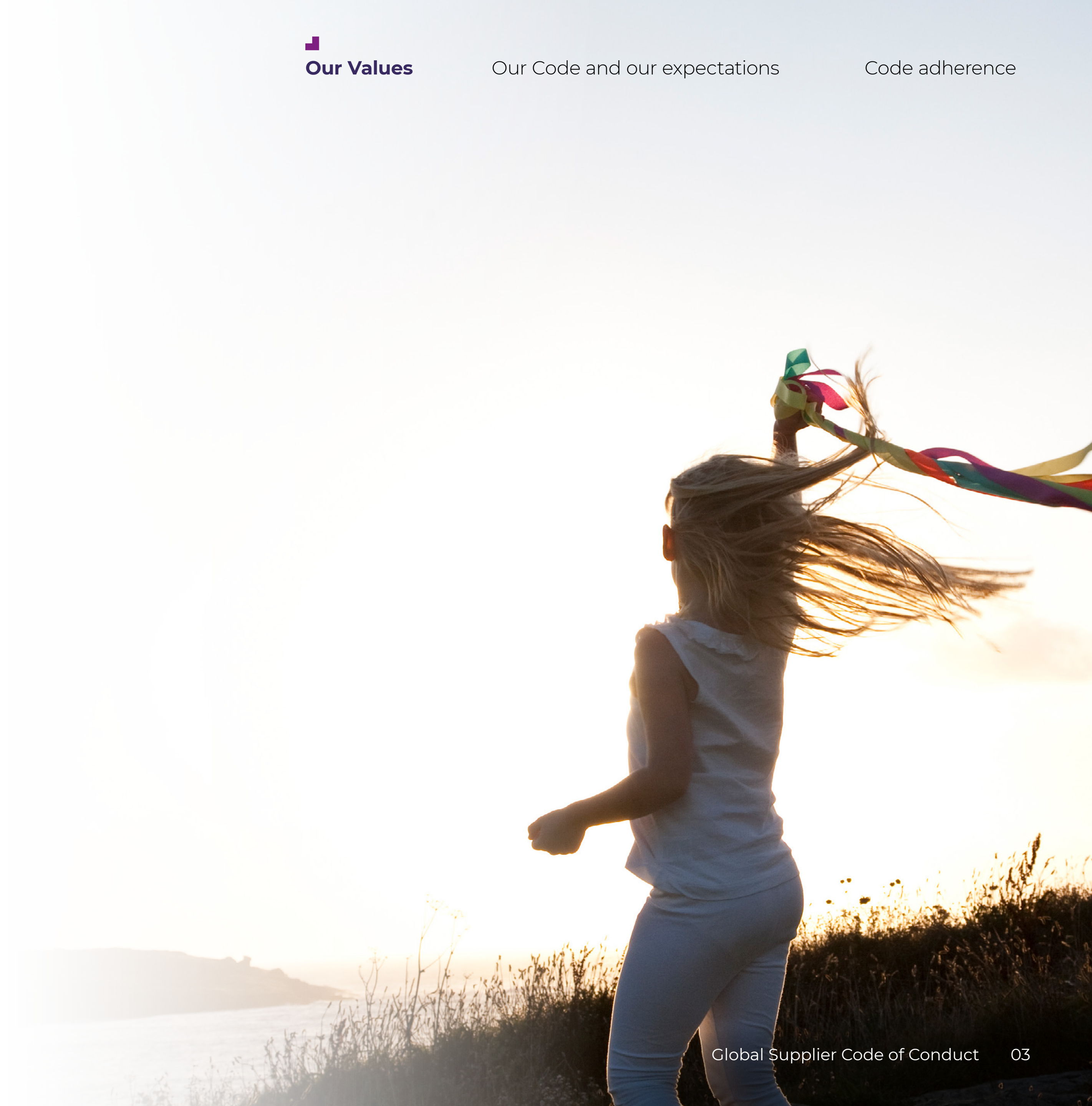
- We are decisive and take responsibility.
- We value diversity and play to everybody's strengths.
- We put customers at the heart of our business.



Aim High:

We believe in being bold and positive.

- We continuously strive to improve.
- We keep an open mind and try new things.
- We help each other succeed.





Our Code and our expectations



Our Global Supplier Code of Conduct (the “Code”) specifies the minimum standards that we expect of ourselves and our supply chain and are our foundation for doing business. These standards are based on our values and should be reflected in all our dealings with our suppliers. This Code sits alongside [Our Code of Business Ethics](#).

Where there is divergence between local laws and regulations and the standards set out in this Code, suppliers should adopt the higher standard.

Our commitment to sustainable supply chains is reflected in our alignment and commitment to the [UN Global Compact](#).

Ethics and Governance

Suppliers must commit to the highest standards of ethical conduct when dealing with workers, suppliers, and customers.



Anti-Bribery and Corruption

The highest standards of integrity are to be upheld in all business interactions. We have a zero-tolerance policy to all forms of bribery, corruption, extortion, or embezzlement.

Bribes, facilitation payments, kickbacks, illegal political contributions, money, goods, services, entertainment, employment, contracts or other means of obtaining undue or improper advantage are not to be promised, offered, authorised, given, or accepted. This prohibition covers promising, offering, authorising, giving, or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Suppliers must comply with all applicable anti-corruption laws through implementing monitoring, record keeping, and enforcement

procedures. Where any Spectris employee, one of our businesses, or a business partner has done anything to breach this Code or our Code of Business Ethics they can be reported via the Spectris' confidential [Speak Up helpline](#).

Suppliers must comply with all applicable competition laws, including, but not limited to, those relating to information sharing with competitors, price fixing, and bid rigging.





Conflicts of Interest

Suppliers must strive to avoid any conflicts of interests that could influence the ability to act objectively. Suppliers must disclose in full any potential or actual conflicts of interest so that they can be addressed. Definitions and other information can be found on the [UN website](#).

Data, Confidentiality and Privacy

Suppliers must protect an individual's privacy rights and comply with privacy and information security laws and regulatory requirements when personal data is collected, stored, processed, transmitted, and shared.

In the course of our day-to-day business operations, we gather and handle personal data belonging to our employees and suppliers. It is our joint obligation to consistently handle this data in a confidential and diligent manner, as it is an integral part of our corporate responsibility.

Intellectual Property

Intellectual property rights are to be respected, including by complying with all laws and regulations applicable to intellectual property and not violating, misappropriating or infringing upon the intellectual rights of any person or entity. Transfer of technology and know-how is to be done in a manner that protects intellectual property rights. Suppliers must protect the confidential and proprietary information of the Spectris group and others. Our confidential information must not be disclosed to third parties without prior written authorisation and information should be used only for its intended business purpose.

Information and Cyber Security

Suppliers should maintain high standards of information and cyber security, which is crucial to safeguarding data, information, and intellectual property. We expect our suppliers to work in collaboration with us to ensure an adequate level of security, implementing suitable technical and organisational measures to protect against potential risks.





Trade Compliance and Sanctions

Suppliers must understand and conduct business in full compliance with all applicable sanctions and governmental export control laws and regulations, including, but not limited to, compliance with restrictions on the movement of funds, products, goods, materials, services, software, and technology governed by those laws and regulations.

Ethics and Speak Up

Suppliers should provide a mechanism for employees and other stakeholders to report ethical concerns in accordance with local laws and regulations. Suppliers must protect the anonymity of and prohibit retaliation against workers due to their raising of a whistleblowing concern in good faith or who refuse to do anything that is in violation of this Code.

Quality

Suppliers must produce and deliver products and services to the specified quality and safety and should evaluate the performance of processes, products and services to ensure continuous improvement. Suppliers should proactively address the procurement and usage of plagiarised or counterfeit materials.

Taxes and Financial responsibilities

Suppliers must uphold compliance with applicable legal requirements regarding taxes, accounting, and financial reporting. Suppliers should ensure that all financial matters are conducted in a transparent, responsible, and accountable manner.



Fair Treatment of Employees and Human Rights

Suppliers are expected to support and respect all internationally recognised human rights in any part of its supply chain. These are those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration of Fundamental Principles and Rights at Work from time to time in force. Suppliers must actively identify and address potential violations across their own operations and throughout their value chain.



Modern Slavery, Trafficking and Forced Labour

All work must be voluntary. Forced, bonded (including debt bondage) or indentured labour, involuntary or exploitative prison labour, slavery or trafficking of persons is not permitted.

This includes transporting, harbouring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction or fraud for labour or services. There shall be no unreasonable restrictions on workers' freedom of movement including the requirement to lodge deposits or identity papers. All workers should be provided with clear and understandable information regarding their employment and all disciplinary matters must be appropriately recorded.

Child Labour

Child labour is not permitted at any point in our supply chain. The term "child" refers to any person under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is highest. Verifying the age of workers is expected to be done through the

implementation of an appropriate process. The use of legitimate workplace apprenticeship programmes, which comply with all laws and regulations, is supported.

Workers under the age of 18 shall not perform work that is likely to jeopardise their health, safety, mental or physical well-being, morals, or hinder their ability to fulfil their compulsory education obligations. Suppliers should ensure proper management of student workers. Further to this, Suppliers should provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks. If child labour is identified, the Supplier shall take appropriate remediation steps ensuring that the best interests of the child are the primary consideration. Suppliers shall ensure the child attends mandatory schooling and collaborate with governmental and non-governmental organisations to ensure the child's basic needs are met after termination of employment.





Diversity and Inclusion

We believe that innovation and growth is accelerated by fostering inclusive teams of diverse employees and we recognise that teams' varied backgrounds, experiences, and ideas are critical to our success.

Suppliers should promote diversity and must commit to a workplace free of harassment and unlawful discrimination. Suppliers shall not engage in discrimination or harassment based on race, colour, age, gender, sexual orientation, gender identity and expression, caste, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. Workers or potential workers should not be discriminated against on the basis of medical tests.

Working Hours

Working hours are not to exceed the maximum set by local laws and regulations. Workers shall be provided with at least one scheduled day off every seven days and not work more than six consecutive days. All overtime must be voluntary.

Living Wages

Compensation paid to workers must comply with all applicable wage laws and regulations, including those relating to minimum wages, overtime hours,

and legally mandated benefits. Deductions from wages as a disciplinary measure shall not be permitted. Suppliers must offer vacation time, leave periods, and holidays consistent with applicable laws and regulations, and pay workers in a timely manner and at regular intervals. Workers should be free to dispose of their wages as they choose. All use of temporary, dispatch and outsourced labour must be within the limits of the local law.

Freedom of Association and Collective Bargaining

Where in conformance with local law, it is expected that suppliers respect the right of all workers to form, join, represent and be represented by trade unions and other employee organisations of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respecting the right of workers to refrain from such activities. Where the right to freedom of association and collective bargaining is restricted under local law, suppliers should facilitate and not hinder the development of parallel means for independent and free association and bargaining.

Workers shall be able to openly communicate and share ideas, concerns, and grievances with management regarding working conditions and management practices without fear of retaliation, intimidation, or harassment. Suppliers must engage in good faith in negotiations, either on its own behalf or through employers' associations, regarding employment conditions.



Conflict Minerals

Where applicable, suppliers must have adequate policies and procedures and undertake due diligence on the source and chain of custody of tantalum, tin, tungsten, and gold in the products they manufacture to reasonably assure that they are sourced in a way consistent with the Organisation for Economic Co-operation and Development [Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas](#) or an equivalent and recognised due diligence framework. Suppliers must provide us with their policies and procedures and due diligence reports upon our request.

Standards for Health and Safety

Fostering a safety-first culture is our first priority. We recognise that in addition to minimising the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, the consistency of production, and worker retention and morale. We also recognise that ongoing worker input and education are essential to identifying and solving health and safety issues in the workplace.

We recommend, but do not mandate, the adoption of ISO 45001:2018. Suppliers must meet the minimum legal standards as set by local legislation. In addition, our minimum health and safety standards that suppliers must follow are as follows:

- **Occupational Safety**

Worker potential for exposure to potential health and safety hazards (chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and mitigated using the [Hierarchy of Controls](#). Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about the risks associated with these hazards. Reasonable steps must also be taken to ensure the relevant employee can safely perform the specific tasks they are assigned. This may include removing pregnant women/nursing mothers from working conditions with high hazards, removing or reducing any workplace health and safety risks to pregnant women and nursing mothers, as well as making reasonable accommodations for nursing mothers. Workers shall not be disciplined for raising safety concerns and shall have the right to refuse unsafe working conditions without fear of retaliation until management adequately addresses their concerns. All suppliers must implement a clear health and safety program and have a designated manager/representative overseeing the program.





- **Emergency Preparedness**

Potential emergency situations and events are to be identified and assessed, and their impact minimised, by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills. Emergency drills must be executed at least annually, or as required by local law, whichever is more stringent. Emergency plans should focus on minimising harm to life, the environment and property.

- **Occupational Injury and Illness**

Procedures and systems are to be in place to prevent, manage, track, and report occupational injury and illness, including provisions to encourage workers to report, classify and record injury and illness cases, provide necessary medical treatment, investigate cases, and implement corrective actions to eliminate their causes, and facilitate the return of workers to work.

- **Physically Demanding Work**

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing, and highly repetitive or forceful assembly tasks is to be identified, evaluated, and controlled.

- **Machine Safeguarding**

Production and other machinery shall be evaluated for safety hazards on an ongoing basis. Physical guards, interlocks, and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

- **Sanitation, Food, and Housing**

Workers are to be provided with ready access to clean toilet facilities, potable water, and sanitary food preparation, storage, and eating facilities. Worker dormitories, provided by the supplier or a labour agent, are to be maintained to be clean and safe standards.

- **Health and Safety Training and Communication**

Suppliers must provide workers with appropriate workplace health and safety information and training in a language the worker can understand, for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is to be provided to all workers prior to the beginning of work, on a change in role and regularly thereafter.

Environment

We recognise that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, the environment, and natural resources are to be minimised while safeguarding the health and safety of the public.



Environmental Standards

We recommend the adoption of ISO 14001:2015. If this is not followed, then our minimum environmental standards that suppliers must follow are as follows:

- **Environmental Permits and Reporting**

All required environmental permits (e.g. discharge monitoring), approvals, and registrations are to be obtained, maintained, and kept current, and their operational and reporting requirements are to be followed.

- **Pollution Prevention**

Emissions and discharges of pollutants and generation of waste are to be minimised or eliminated at the source or by practices such as adding pollution control equipment, modifying production, maintenance, and facility processes, or by other means.

- **Resource Efficiency**

The use of natural resources, including water, fossil fuels, minerals, and virgin forest products, is to be conserved by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling, or other means.

- **Hazardous Substances**

Chemicals, waste, and other materials posing a hazard to humans or the environment are to be identified, labelled, and managed to ensure their safe handling, movement, storage, use, recycling or reuse, and disposal.

- **Solid Waste**

A systematic approach to identify, manage, reduce, and responsibly dispose of, or recycle, solid waste (non-hazardous) should be implemented.



**Air & Noise Emissions**

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone-depleting substances, and combustion by-products generated from operations should be characterised, routinely monitored, controlled, and treated as required prior to discharge. Ozone-depleting substances must be effectively managed in accordance with the [Montreal Protocol](#) and applicable laws and regulations. Suppliers should conduct routine monitoring of the performance of its air emission control systems. Conducting reviews of noise emissions to identify, review and reduce noise should be done periodically and in line with local legislative requirements to minimise harmful and excessive noise.

Materials Restrictions

Suppliers must comply with all applicable laws and regulations prohibiting or restricting the use and handling of specific substances in manufacturing and product materials, including labelling for recycling and disposal.

Upon request, suppliers are expected to provide full material content information. Suppliers should conform with applicable labelling laws and regulations for recycling, identification and management of product substances that pose an environmental hazard including:

- Restriction of Hazardous Substances (RoHS) in the European Union and China
- Regulation on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)
- Waste Electrical and Electronic Equipment (WEEE)
- End of Life Vehicle Directive in the European Union (ELV)

Upon request, suppliers must provide us with a material content declaration using the industry standard IPC-1752A XML Class D format.



Water Management

Suppliers should implement a water management program that documents, characterises, and monitors water sources, use and discharge; seeks opportunities to conserve water, and controls channels of contamination. All wastewater is to be characterised, monitored, controlled, and treated as required by applicable laws and regulations prior to discharge or disposal.

Energy Consumption and Greenhouse Gas Emissions

Suppliers should support the delivery of our Net Zero commitment, which is to be Net Zero across Scope 1 and 2 by 2030, and Net Zero in Scope 3 by 2040.

Suppliers should track and be able to actively report on energy consumption and all relevant Scope 1 and 2 greenhouse gas emissions data. Suppliers should also consider an appropriate greenhouse gas reduction target for their own business. Looking for methods to improve energy efficiency and to minimise their energy consumption and greenhouse gas emissions is expected. Upon request, suppliers shall participate in EcoVadis ratings assessment, and shall consider implementation of EcoVadis (or an equivalent provider) for their own supply chain management.

Biodiversity

Suppliers should be proactive and commit to the Locate, Evaluate, Assess and Prioritise (LEAP) approach to better understand and mitigate their own nature-related risks and maximise opportunities. Suppliers are expected to implement appropriate management programmes to ensure supply chains do not contribute to deforestation.



Code adherence



Suppliers should:

- Ensure their employees, contractors, agents, suppliers and other parties working on their behalf act in accordance Code.
- Conduct appropriate due diligence to identify, correct and monitor the continued compliance of any activities that fall below the standards of the Code.
- Report to Spectris any non-adherence with the Code in a timely manner and agree, together with Spectris, a plan for corrective action.
- Provide Spectris with reasonable access to all relevant information and premises for the purposes of assessing performance against the Code and are responsible to ensure that their subcontractors and suppliers do the same. Audits may be conducted by or on behalf of Spectris in accordance with the Code.



A close-up, high-angle photograph of a person's eye, looking slightly to the right. The eye is light-colored, possibly hazel or green, and is framed by dark eyelashes. The person is wearing a dark blue or black collared shirt. The background is a soft, out-of-focus light blue.

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If you have any questions or concerns regarding our Code of Conduct, please contact us at www.spectrishelp.com

