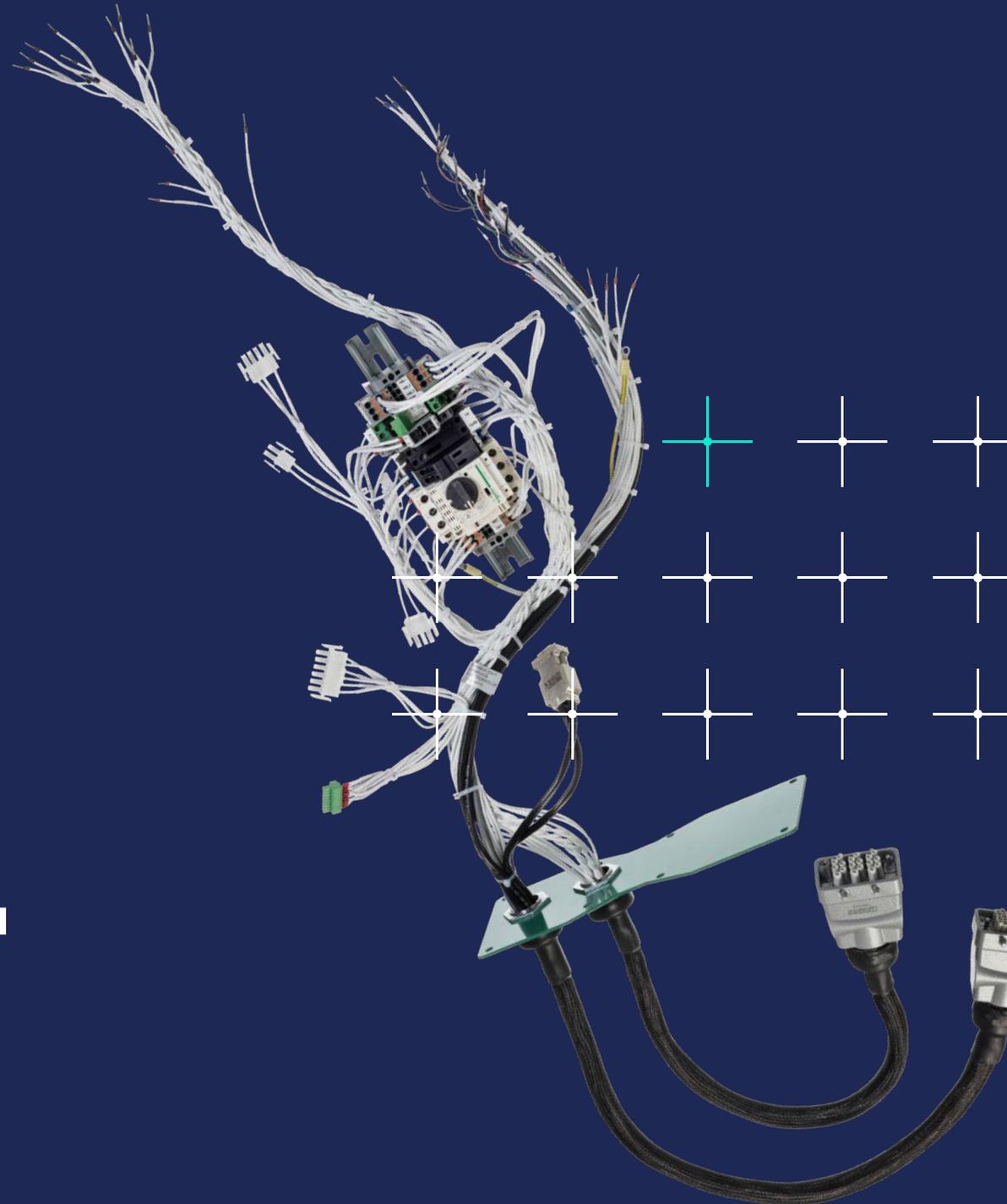




STRONG PARTNERSHIPS, LASTING CONNECTIONS

# SUPPLIER CODE OF CONDUCT





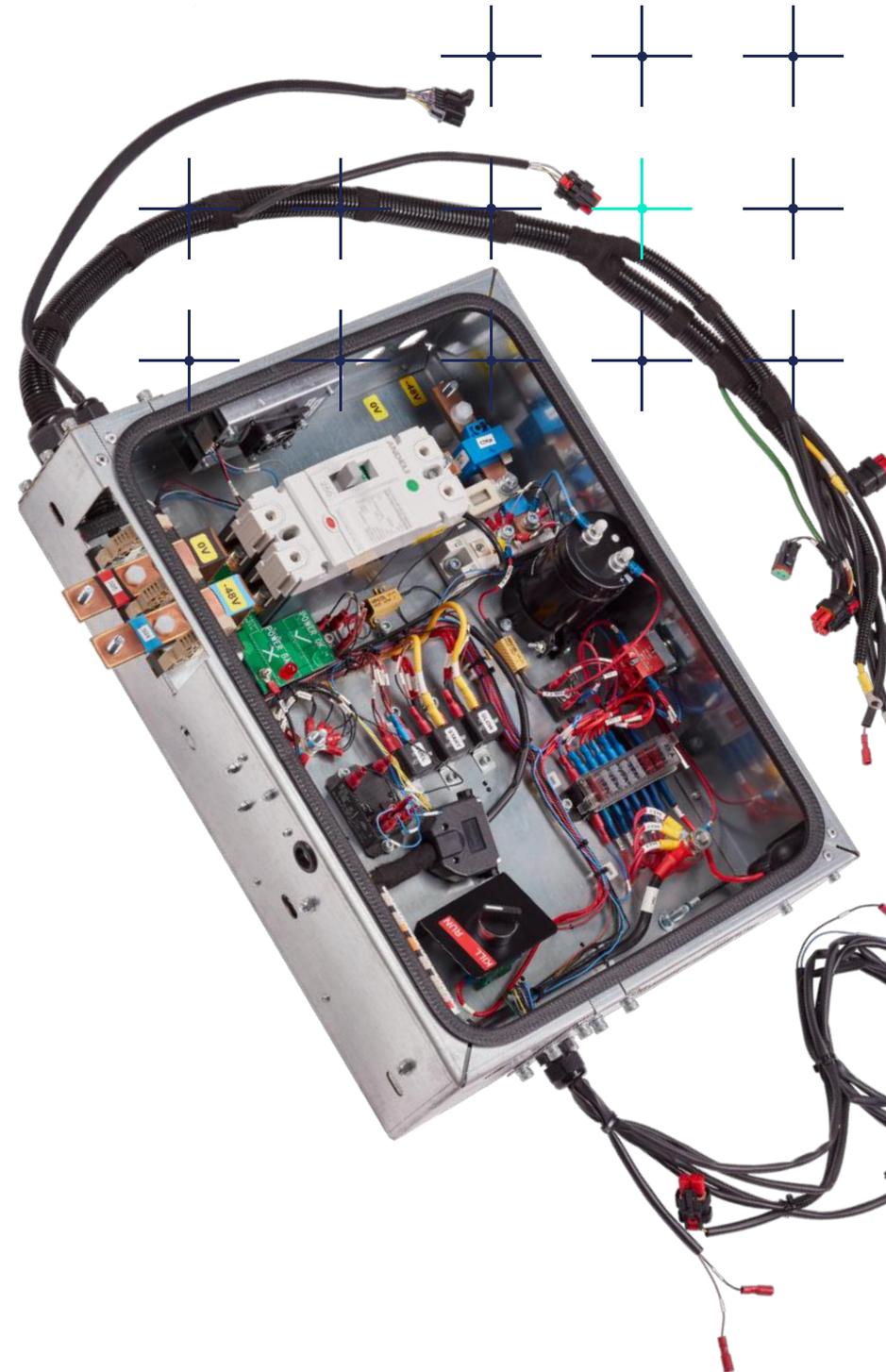
# INTRODUCTION

Cornelius holds itself to high standards with regards to how we conduct business, and our Supplier Code of Conduct is based on the principles set out in the Responsible Business Alliance Code of Conduct.

We expect our suppliers and business partners to pursue compliance with the standards set out in our Code of Conduct (alongside all national laws and regulations), in all business activities relating directly or indirectly to Cornelius.

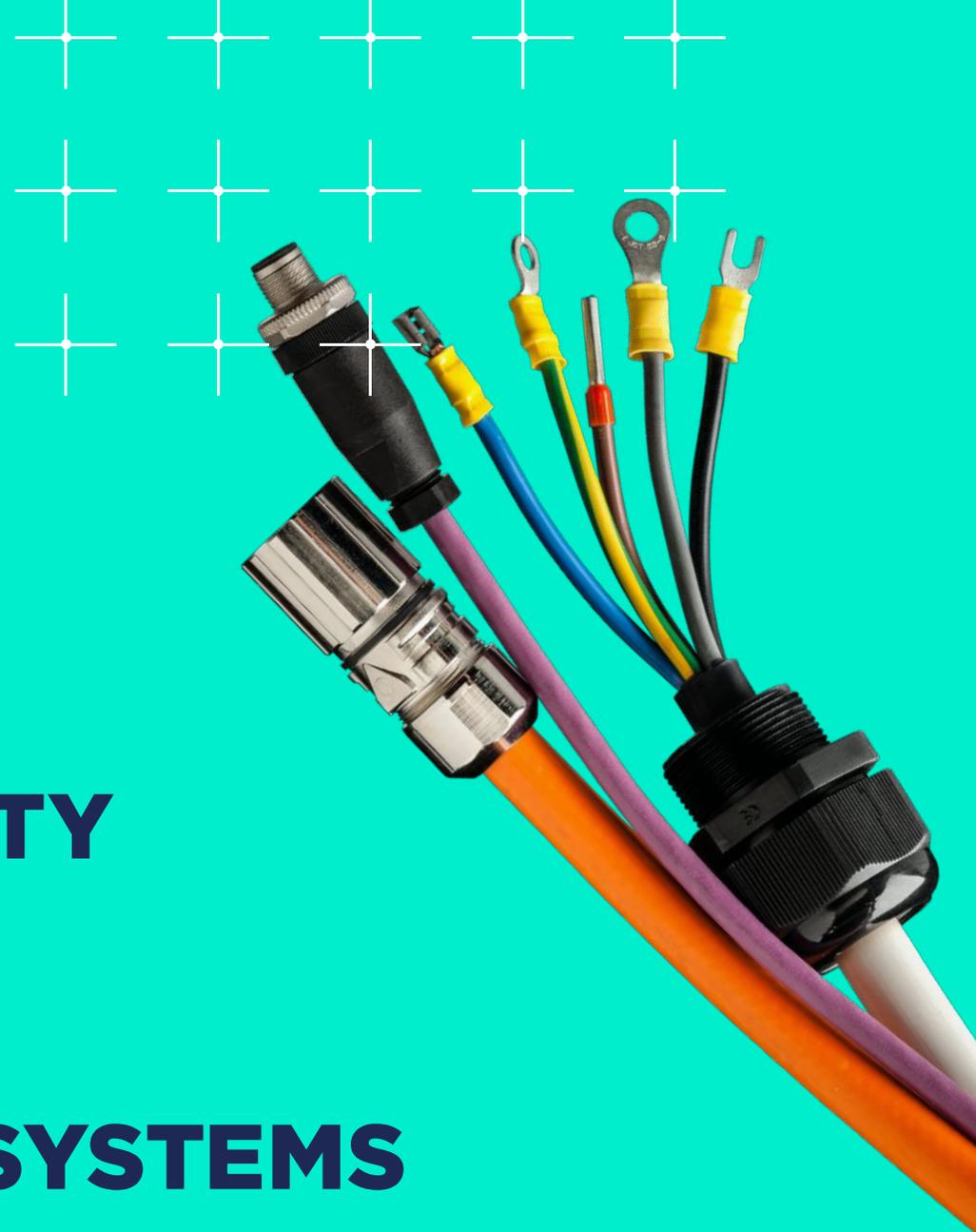
Cornelius encourage Suppliers to ensure that their standards of business are engrained into the culture of their organisation and enforced through their supply chains.

Whilst we are committed to working with suppliers to ensure compliance where a risk is identified, we will not continue any business relationship where a Supplier fails to address concerns raised by us.





- 01 / LABOUR**
- 02 / HEALTH & SAFETY**
- 03 / ENVIRONMENT**
- 04 / ETHICS**
- 05 / MANAGEMENT SYSTEMS**





# LABOUR

Through our supply chain we are committed to supporting and respecting the protection of human rights internationally and ensuring that we are not complicit directly or indirectly with human rights abuses.

Suppliers must be able to demonstrate that employees are treated with respect and dignity, and all employment terms and conditions must be fair, clearly communicated in writing, and must comply with national laws.

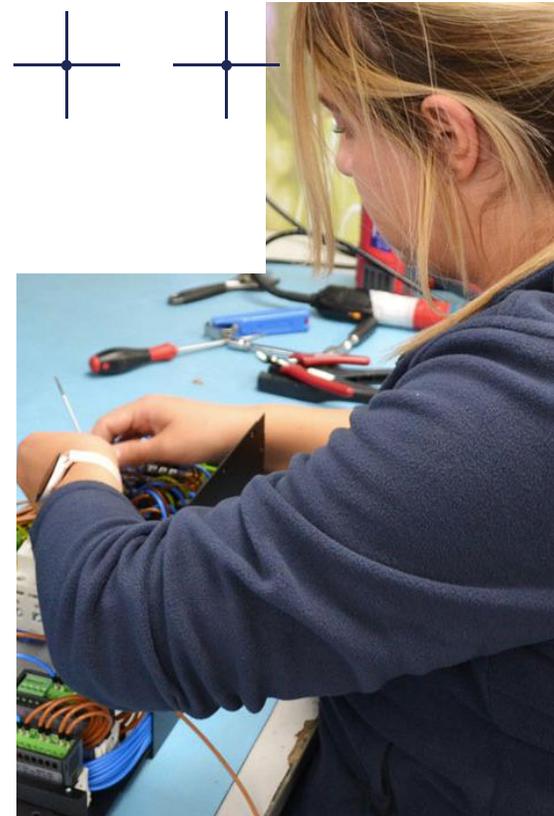
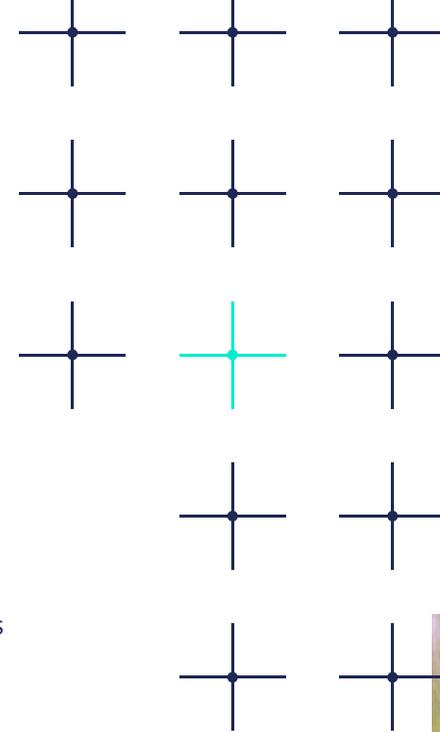
Employees must be free (to the extent of national laws) to participate in trade union activity, and suppliers are expected to commit to fair and equal pay principles, ensuring that they are advancing gender equality.

Employment must not be forced, bonded, or otherwise compulsory and employees must be free to leave their employment. Employees should not be required to submit identity documents to their employer which would restrict their freedom of movement.

Working hours should not be excessive and must comply with national laws. A working week should not exceed sixty hours, overtime should be voluntary, and Suppliers must ensure a minimum of one rest day per seven days.

Employees should be provided with employment which is free from any inhumane treatment (including physical violence or threat of the same), or discrimination of any kind, for any protected characteristic. Suppliers are expected to provide a safe working environment where human rights are protected and defended.

Suppliers must commit to compliance with the ILO Convention No. 138 which sets out the minimum legal age for employment. Suppliers must not employ any person who is below the minimum legal age for employment.





# HEALTH & SAFETY

Suppliers should aim to minimise the incidents of work-related injury and illness, promoting a safe and healthy work environment. Suppliers must comply with national laws relating to the health and safety of their employees.

Robust procedures should be implemented to ensure that occupational risks are minimised. This should include risk assessments, employee training, safety policies and procedures, and incident reporting/management processes.

Potential emergency situations should be assessed, and risks minimised with robust procedures which are tested regularly.

Employees should be provided with a safe, sanitary, and hygienic working environment (and living space where relevant). Suppliers are expected to provide and maintain appropriate PPE/safety equipment and to ensure that the safety and integrity of machinery and hazardous equipment is properly maintained.

Suppliers should ensure that employees receive health and safety training relevant to their roles, and that employees are encouraged to raise health and safety concerns without retaliation.





# ENVIRONMENT

**Suppliers are encouraged to pursue compliance with a recognised environmental management system such as ISO 14001.**

Suppliers are expected to consider the environmental impact of their activities, and to take action to minimise their environmental impact wherever possible. Cornelius supports a culture of continuous improvement in relation to environmental policies and procedures.

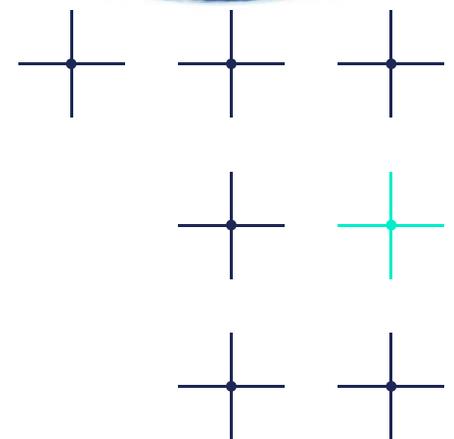
This may be by undertaking environmental impact assessments and implementing corrective actions.

Cornelius encourages supplier policies which reduce environmental impact. This may include the implementation of new procedures, or investment in more environmentally friendly machinery and equipment (such as solar panels).

Suppliers must be able to demonstrate actions taken to ensure the responsible and legally compliant handling and use of any hazardous materials, and other waste, throughout their supply chains.

Environmental permit requirements must be complied with, and suppliers should adhere to all applicable laws, regulations, and customer requirements regarding restriction of specific substances in products and manufacturing.

Suppliers should understand their water usage and energy consumption and should be able to demonstrate actions taken to reduce the environmental and social impacts of their activities.





# ETHICS

## **a. Business integrity**

Suppliers should be able to demonstrate their commitment to business integrity by implementing robust policies prohibiting bribery, corruption, and extortion.

## **b. No improper advantage**

Bribes and other means of obtaining an unfair advantage should not be tolerated by Suppliers.

Suppliers should have robust monitoring, reporting, enforcement and record-keeping procedures to demonstrate compliance with anti-corruption policies.

## **c. Disclosure of information**

All business dealings should be transparently performed and accurately reflected on the Participant's business books and records.

Information regarding participants labour, health and safety, environmental practices, business activities, structure, financial situation, and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices.

Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

## **d. Fair business**

Standards of fair business, advertising and competition are to be upheld.

## **e. Protection of identity and non-retaliation**

Suppliers are expected to ensure the confidentiality, anonymity, and protection of whistleblowers, and should have a policy and process for concerns to be raised without retaliation.

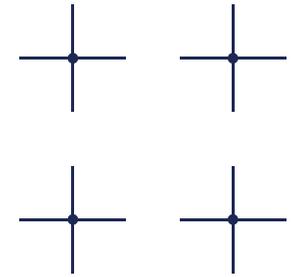
## **f. Responsible sourcing of minerals**

Suppliers must be able to demonstrate that they exercise due diligence on the source and chain of custody of the 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 (OECD) Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas or an equivalent and recognised due diligence framework.

## **g. Privacy**

Suppliers are expected to demonstrate a commitment to protecting the reasonable privacy expectations of personal information in their possession. Privacy and information security laws and regulatory requirements must be complied with.

Suppliers are required to sign a Cornelius Non-Disclosure Agreement, and all business information is considered to be strictly confidential.



# MANAGEMENT SYSTEM

Suppliers are expected to establish a system to ensure compliance with Cornelius' Supplier Code of Conduct, and to communicate this to all appropriate employees and through their supply chains.

The supplier must ensure that records are maintained in order to demonstrate compliance when required.



# LASTING CONNECTIONS



STRONG PARTNERSHIPS, LASTING CONNECTIONS

## **REFERENCES**

- *International Labour Organization - [www.ilo.org](http://www.ilo.org)*
- *ISO 14001 - [www.iso.org](http://www.iso.org)*
- *Organisation for Economic Co-Operation and Development (OECD) - [www.oecd.org](http://www.oecd.org)*
- *Responsible Business Alliance - [www.responsiblebusiness.org](http://www.responsiblebusiness.org)*
- *United Nations Global Compact*

**[www.cornelius-electronics.co.uk](http://www.cornelius-electronics.co.uk)**

Cornelius Electronics Ltd, Purcell Avenue, Port Talbot, SA12 7TZ, United Kingdom  
Company Reg No. 01729062 | VAT Reg No. 910935925