

# Invertek Drives Limited

## Supplier Code of Conduct



January 2024

Invertek Drives Limited (IDL) has a 'zero tolerance' policy when it comes to unethical business behaviour, such as bribery, corruption and forced labour. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically.

As a supplier, you must comply with all applicable laws and regulations, the requirements set out in this IDL Supplier Code of Conduct and your contractual obligations to us. This IDL Supplier Code of Conduct defines the main principles underlying your business activities as one of our suppliers.

### A. Human rights

As a supplier to IDL, you shall:

- Respect the personal dignity, privacy and rights of each individual;
- Refuse to make any person work against his or her will;
- Prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

### B. Fair labour conditions

You shall ensure fair labour conditions. In particular, you will:

- Refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- Respect the rights of employees to freely associate and bargain collectively;
- Not tolerate or use child labour in any stage of your activities other than in accordance with all applicable laws and regulations;
- Not use any forced labour, including but not limited to involuntary prison labour, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice;

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- Compensate employees fairly and follow local wage regulations and/or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;
- Ensure that working hours, including overtime, do not exceed applicable legal requirements, and where such requirements do not exist, we recommend that working hours not exceed sixty hours per week including overtime;
- Ensure that employees are allowed at least one uninterrupted day off per week.

Therefore complying with IDL's Modern Slavery Statement and adhering to the Modern Slavery Act 2015, throughout your own structure and that of your suppliers

### **C. Health, safety and environmental management**

You shall provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way. In particular, you will:

- Formally appoint a competent person to manage health, safety and environmental programs and improvements;
- Establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- Ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

### **D. Material compliance and conflict minerals**

At IDL, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, suppliers shall ensure that the goods provided to IDL are in compliance with requirements covered under the scope of all relevant regulations. In particular, you will:

- Implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals;
- Respond in a timely manner to IDL's requests for evidence of your compliance with these requirements.

## E. Business ethics

You shall conduct your business in an ethical manner. In particular, you will:

- Refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including IDL employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- Adhere to anti-trust and other competition laws;
- Disclose to IDL information regarding potential conflicts of interest relating to your activities as an IDL supplier, including disclosure of any financial interest an IDL employee may hold in your business;
- Protect all confidential information provided by IDL and our respective business partners;
- Respect intellectual property of others, including IDL China or their nominated contractor(s);
- Adhere to international trade regulations and export control regulations.

## F. Secure business

You shall conduct your business in a secure manner. In particular, you will:

- Implement reasonable measures for minimizing exposure of IDL to security threats such as terrorism, crime, pandemics and natural disasters.

## G. Procurement by supplier

You shall procure goods and services in a responsible manner.

In particular, you will:

- Select your own tier one suppliers providing goods or services directly or indirectly to IDL based on them agreeing to adhere to standards comparable to those set forth in this IDL Supplier Code of Conduct; and
- When working at IDL locations, only subcontract work with prior consent from IDL.

## H. Inspections and corrective actions

In order to ensure and demonstrate compliance with the IDL Supplier Code of Conduct, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request.

To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of such an audit or inspection cause us to be of the opinion that you do not comply with this IDL Supplier Code of Conduct, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this IDL Supplier Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our suppliers.

## I. Access to remedy

In the context of our business relationship, if you or your employees believe that the terms of this IDL Supplier Code of Conduct are not adhered to, or that IDL is not acting in accordance with its own IDL Code of Conduct, then we encourage you to raise your concerns to us at IDL via your Purchasing Account Manager or [John.Evans@shi-g.com](mailto:John.Evans@shi-g.com) the Strategic Procurement Manager.



**Mike Dean**  
Global Supply Chain Manager