

Invertek Drives Limited

Supplier Code of Conduct



January 2026

Invertek Drives Limited (IDL) has a 'zero tolerance' policy when it comes to unethical business behaviour, such as bribery, corruption, fraud and forced labour. We expect all 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.
- Recognize and respect the rights of employees to freely associate, bargain collectively, and join trade unions, in accordance with local laws and regulations.
- Comply with applicable minimum age requirements and the minimum age for employment, whichever is higher.
- Implement confidential and accessible grievance mechanisms and whistleblower procedures to allow worker to report concerns without fear of retaliation or coercion.

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- Not use any forced labour, including but not limited to involuntary prison labour, child labour, victims of slavery and human trafficking and allow all employees the choice to leave their employment freely upon reasonable notice.
- Ensure a healthy and safe workplace environment is provided, with hazards identified, risks controlled, and appropriate personal protective equipment provided free of charge.
- Not engage in or tolerate any form of discrimination based on age, gender, birth, ethnicity, religion, political opinion, sexual orientation, disability, or any other protected characteristic”.
- Compensate employees fairly and follow local wage regulations and/or collective agreements, that meets or exceeds legal minimums and industry standards.
- Ensure that workers receive clear, written information about their compensation and employment terms in clear writing, and a language they understand.
- 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 and Safety Management

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

- Formally appoint a competent person to manage health, safety and environmental programs and improvements.
- Establish appropriate organisational 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. Environmental Management

You shall manage the following:-

- Wastes, water, air emissions and hazardous materials associated with your activities.
- Carbon emissions and the ability to transition to a lower carbon emissions and set and share carbon reduction targets.
- Collate and verify relevant and environmental carbon data.

E. 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.
- Strengthen resilience against climate related disasters, and share these adaptation strategies with IDL.

F. Cyber Security

As suppliers are an extension of our business, you must maintain robust security controls to protect information assets. In particular, you must:

- Implement and maintain appropriate risk-based technical and organisational security measures (TOMs) to protect our information assets and systems. These measures should align with industry-recognised good security practices and standards, such as those specified by Cyber Essentials, ISO 27001, or other applicable legislation.
- Immediately report any actual or potential data breach or cyber security incident that affects, or has the potential to affect, our data or systems upon discovery, ideally within 24 hours, providing all relevant details and a plan for containment and remediation.
- Ensure that all employees and personnel with access to our data receive regular, at least annual, training on cyber security risks and applicable security policies and procedures.
- Be ready to provide proof of formal certifications, as we reserve the right to audit the supplier's security controls and processes to verify compliance with these requirements".

G. 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 following 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.
- Update policies in-line with any changes to regulations within a reasonable time frame.

H. Business Ethics

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

- Refrain from 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.

I. Procurement by Supplier

You shall procure goods and services in a responsible manner. You will cascade the requirements of this Supplier Code of Conduct to any suppliers outsourced during work for IDL.

In particular, you will:

- Select your own tier one supplier's 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.

J. 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.

K. GDPR and Data Protection

You shall commit to protecting all personal data (as defined by UK GDPR/GDPR) processed on your behalf and comply with all applicable data protection laws. In Particular, you must:

- Strictly adhere to all applicable data protection and privacy legislation and regulations, including but not limited to the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, when processing any personal data related to our business or our customers.
- Ensure the confidentiality, integrity, and availability of all information received from us, protecting it from unauthorised access, destruction, use, modification, and disclosure through appropriate technical and organisational measures"

- Ensure that personal data shall only be processed for the specific, explicit, and legitimate purposes defined in the relevant contract and not for any other business purposes without our prior written consent
- Assist us in fulfilling our obligations to respond to requests from data subjects exercising their rights under the GDPR (e.g., right of access, erasure, rectification), forwarding any such requests they receive to our designated contact immediately.
- Ensure that the engagement of any sub-processors for the processing of personal data requires our prior specific or general written authorisation. Where authorised, suppliers must ensure that the same data protection obligations are imposed on the sub-processor.

L. 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 the Strategic Procurement Manager.

John Evans

