

SUPPLIER CODE OF CONDUCT

Conduct towards employees

At Anderton Castings, we expect that our suppliers respect and comply with the fundamental rights granted to all employees under applicable national statute. Furthermore, we expect our suppliers to fully recognize the labor standards issued by the International Labor Organization (ILO), taking into due account the applicable laws and regulations in different countries and at different sites.

Discrimination

Equal treatment of all employees will be a fundamental principle of the supplier's corporate policy. Typical discriminatory treatment takes into consideration – consciously or unconsciously – irrelevant characteristics of an employee such as race, national origin, gender, age, physical characteristics, social origin, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression or any unlawful criterion under applicable law. Suppliers will ensure that their employees are not harassed in any way. Anderton Castings encourages suppliers to provide an inclusive and supportive working environment and to exercise diversity when it comes to their employees as well as in their decisions to select subcontractors.

Remuneration and working time

At Anderton Castings, we expect our suppliers to fully comply with applicable national statute on working time. Furthermore, we expect that the employees of our suppliers receive a remuneration which is in line with applicable national statute.

Child labor

At Anderton Castings we do not tolerate child labor in our supply chain. Suppliers should avoid any sort of child labor in their business operations consistent with the ILO's2 (International Labour Organization) core labor standards and the United Nations Global Compact principles.

Forced labor

At Anderton Castings, we expect our suppliers to prohibit any kind of forced labor in their organization. We do not tolerate slavery, servitude and forced or compulsory labor and human trafficking in our supply chain. Bonded, indentured or involuntary prison labor is not accepted as well.

Freedom of association

Suppliers will be committed to an open and constructive dialogue with their employees and workers' representatives. In accordance with local laws, suppliers will respect the rights of their employees to associate freely, join labor unions, seek representation, join works councils and engage in collective bargaining. Suppliers will not disadvantage employees who act as workers' representatives.

Occupational health and safety

At Anderton Castings, we expect our suppliers to fully comply with applicable national statute governing health and safety at work. Furthermore, our suppliers are expected to establish and maintain an appropriate occupational health and safety management system. This includes containing actual as well as potential health and safety risks at work. Moreover, our suppliers are encouraged to train their employees for the purpose of preventing accidents and occupational diseases as best as possible.

Environmental protection

At Anderton Castings, we expect our suppliers to comply with all applicable national laws, regulations and standards to protect the environment. Our suppliers are expected to establish and maintain a suitable environmental management system to minimize environmental impact and hazards, and to improve environmental protection in their everyday operations. We encourage our suppliers to take regularly environmental trainings.

Conduct in business environment

Prohibition of corruption and bribery

At Anderton Castings, we expect our suppliers to have zero-tolerance for corruption and to ensure compliance with all United Nations (UN) and Organization for Economic Co-operation and Development (OECD) conventions against corruption, and with all governing anti-corruption laws. In particular, our suppliers are expected to ensure that their employees, subcontractors and agents do not offer, promise or grant any advantages to any Anderton Castings employees or related parties with the goal of securing an order award or any other form of preferential treatment in their business transactions.

Invitations and gifts

At Anderton Castings, we expect that our suppliers refrain from presenting any invitations or gifts to our employees so as to gain any form of influence. We also expect our suppliers to refrain from asking Anderton Castings employees or related parties for any inappropriate advantages.

Preventing conflicts of interest

In our suppliers' business dealings with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence our suppliers' decisions due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties.

Unrestricted competition

At Anderton Castings, we expect our suppliers to always compete in a fair manner and to comply with applicable antitrust laws and regulations. Our suppliers are expected not to enter with competitors into agreements that might constitute a breach of antitrust law, nor to take advantage of any dominant market position they might hold.

Money laundering

At Anderton Castings, we expect our suppliers to comply with all applicable statute governing the prevention of money laundering, and not to participate in any money laundering activities.

Conflict minerals

Anderton Castings supports the Conflict Minerals Act and expect that also our suppliers respect the Conflict Minerals Act.

Supplier relations

At Anderton Castings, we encourage our suppliers to communicate the principles laid out herein to their subcontractors and subsuppliers and to take these principles into account when selecting subcontractors and subsuppliers. Our suppliers are expected to encourage their subcontractors and subsuppliers to comply with the minimum standards of this Code of Conduct regarding the protection of human rights, working conditions, anti-corruption and environmental protection when fulfilling their contractual obligations.