

WAUKESHA[®]

METAL PRODUCTS

• Tools • Fabrications • Stampings •

Supplier Code of Conduct

ENGINEERED FOR DURABILITY AND STRENGTH[™]



This Supplier Code of Conduct details the requirements and expectations that we have of ourselves and our suppliers.

The standards set forth in this Code of Conduct are subject to compliance with applicable local laws. We expect our suppliers to operate in full compliance with the laws of their respective country, as a minimum. If any requirement listed in this Supplier Code of Conduct conflicts with local laws, the law takes precedence.



Prohibit Harassment: Waukesha[®] Metal Products suppliers must treat all workers with dignity and respect. They may not subject workers to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse. Suppliers may not use monetary fines to discipline employees.

Suppliers must provide an environment that allows employees to raise concerns without fear of retaliation.

Hiring and Employment Practices: Suppliers hiring practices must include verification of workers legal right to work in the country and ensure that all mandatory documents, such as work permits are available.

Suppliers must prohibit discrimination based on race, color, gender, nationality, age, disability, union membership, pregnancy, sexual orientation, marital status, religion, veteran status, health condition, political opinion or affiliation. Suppliers are expected to support diversity and equal opportunity in their workplace.

Child Labor: Suppliers may not employ workers under the age of 16. Workers under the age of 18 may not perform work likely to jeopardize their safety, health or education.

Where permitted by national laws, the suppliers may employ children between 12 and 15 years to perform a few hours of light work per day. Apprenticeship programs for children below the minimum age of employment must be paid for and clearly aimed at training.



Forced Labor: The supplier must not participate in, or benefit from, any form of forced or compulsory labor.

The workers must have the freedom of movement during the course of their employment. The supplier must not withhold the identity cards, travel documents and other important personal papers of its employees, thereby preventing the employees from ending their employment.

Wages, Benefits and Work Hours: Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations, including those relating to minimum wages, overtime, and other elements of compensation, and will provide all legally mandated benefits. Deductions from wages should be transparent and must never be used as a disciplinary measure. Supplier will maintain work hours in accordance with applicable laws and regulations.

Rights of Employees to Freely Associate: Suppliers must recognize and respect the right of employees to freely associate, organize and bargain collectively in accordance with laws of the country in which they are employed. Suppliers must respect the rights of the workers to communicate openly with management, regarding work conditions without fear of intimidation, harassment, penalty, or reprisal.



Community Impact

The supplier is expected to take responsibility for its surrounding community. This for example means that the supplier should avoid involvement or complicity in human rights violations in interactions with state security forces. Furthermore, the supplier should not participate in or benefit from improper, forced relocations, and must compensate adequately for legitimate relocations.

The supplier must establish and maintain emergency procedures to prevent all health emergencies and industrial accidents affecting the surrounding community or the environment.

Working Environment

Suppliers shall commit to ensuring safe working conditions and a healthy working environment for their workers.

Suppliers will provide their workers with personal protective equipment and training necessary to perform their tasks safely.

Suppliers must comply with all applicable health and safety related laws and regulations.

There shall be access to clean drinking water, clean toilets, and washing facilities adequate to the number of employees.

Ethical Conduct

The highest standards of integrity are expected in all business interactions and the supplier must comply with all applicable laws and regulations on bribery and corruption.

The supplier must never, directly or through intermediaries, accept or offer bribes. A bribe is a payment of anything of value – money, products, services, extravagant fits or entertainment – made to a public official or any employee of a commercial partner in order to secretly influence his behavior and thereby improperly obtain or secure business.

The supplier shall also refrain from offering expensive gifts and extravagant entertainment to Waukesha[®]Metal Products purchasers or other employees at Waukesha Metal Products in an attempt to influence business decisions.



Environment

The supplier must ensure compliance of applicable laws and regulations regarding the protection of the environment.

Furthermore, the supplier is expected to actively limit the use of resources as much as possible covering all activities from raw materials to the products' end of life. This includes minimizing the use of raw materials, energy, water and chemicals, handling waste in an environmentally responsible way and recycling materials as much as possible.

The supplier is expected to continuously improve its environmental performance all the way through the value chain by means of operational control and monitoring and by focusing on awareness and training.

Deployment

This Supplier Code of Conduct applies to all Waukesha[®]Metal Products suppliers. The suppliers are also responsible for ensuring that their sub-suppliers comply with this code. We wish to influence our suppliers to contribute to responsible and sustainable development and to demonstrate responsible sub-supplier management, like we do ourselves. We therefore expect our suppliers to actively take responsibility for not only their own actions and activities, but also for their suppliers. The suppliers are furthermore expected to monitor and evaluate their sub-supplier portfolio continuously to ensure that standards are maintained. In Waukesha Metal Products, we wish to refrain from sourcing in conflict areas and from engaging in unethical sourcing strategies, and we encourage our supplier to do the same.

Suppliers must inform Waukesha Waukesha[®]Metal Products if there are conditions prevailing in their own or sub-suppliers' operations that are not in compliance with their Supplier Code of Conduct.

In Waukesha[®]Metal Products, we may conduct announced audits at the supplier's sites in order to verify that the supplier is in compliance with the Supplier code of Conduct. These audits may be performed either by Waukesha Metal Products employees or by a third party auditor chosen by Waukesha[®]Metal Products. In connection with an audit, suppliers shall be prepared to provide Waukesha[®]Metal Products access to all relevant and reasonably requested information and documentation.

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