

# SUPPLIER CODE OF CONDUCT

JULY 2018

At GKN Wheels & Structures we always seek to operate to the highest ethical standards. We call this **“doing the right thing”** and we apply this principle to everything that we do.

As a supplier to GKN Wheels & Structures, you are integral to our success. We aim to develop and maintain relationships with our suppliers and in return expect our suppliers to also **do the right thing**. This means that in addition to providing the highest quality products or services, it is essential that you also operate your business in a way that supports our commitment to the highest ethical standards.

To help you understand what we expect of you and your suppliers in practice, we have prepared this Supplier Code of Conduct which applies globally to all suppliers to GKN Wheels & Structures. We require that you and all our other suppliers comply with this policy, regardless of any conflicting local business practices or social customs.

If you have any questions about this supplier Code of Conduct or about what is expected of you as a GKN Wheels & Structures supplier, please speak to your local contact at GKN Wheels & Structures. If you have any doubts or concerns about how you should behave in any particular situation we would always prefer that you speak to us about them first.

## Doing the right thing – what we expect from you...

**As a supplier to GKN Wheels & Structures, you and your suppliers will:**

### ETHICAL STANDARDS

- Maintain high standards of integrity, honesty, professionalism and fair-dealing.
- Not commit any act which may adversely impact GKN Wheels & Structures's interests, reputation or good standing.
- Conduct your business in an open and ethical manner, with respect for human dignity and rights.
- Always have high standards of social responsibility.
- Respect the integrity of any information we provide to you and only use it for the purposes for which it is provided.

### BRIBERY & CORRUPTION

- Not engage in any practice which is, or might be perceived to be, corrupt or fraudulent.
- Neither pay nor accept (nor tolerate anyone else paying or accepting) any bribes, 'kickbacks' or other similar payments or inducements. This includes 'facilitation payments' made to facilitate or speed up official or governmental procedures.

## As a supplier to GKN, you will:

### YOUR EMPLOYEES & WORKERS

- > Not use child labour or any form of forced, bonded or involuntary labour.
- > Comply with all applicable labour laws and regulations and internationally accepted standards of workers' rights.
- > Within the laws, customs and practices of the countries in which you operate, not unreasonably or unlawfully discriminate against any employee or worker, nor engage in actual or threatened physical abuse or discipline, sexual or other harassment, or verbal abuse or intimidation.

### OUR EMPLOYEES & WORKERS

- > Avoid engaging with GKN Wheels & Structures employees in a way which results in, or may be perceived to result in, an inappropriate conflict of interest for them. A conflict of interest can arise when the personal interests of a GKN Wheels & Structures employee are inconsistent with the responsibilities of his or her position.
- > Respect GKN Wheels & Structures's position on gifts and hospitality. We prefer that you do not give GKN Wheels & Structures employees gifts or gratuities. GKN Wheels & Structures operates a corporate hospitality policy and GKN Wheels & Structures employees may be required to decline gifts, gratuities or offers of hospitality which may be perceived as a bribe or inducement. GKN Wheels & Structures employees are never allowed to request gifts and under no circumstances should you feel obliged to offer gifts or gratuities to a GKN Wheels & Structures employee.

### HEALTH, SAFETY & THE ENVIRONMENT

- > Comply with all applicable health and safety laws and regulations. Provide a safe, clean and hygienic workplace for your employees and visitors (including GKN Wheels & Structures employees). Where your employees are at a GKN Wheels & Structures premises, ensure they operate and behave in an acceptable and safe manner, without presenting an undue risk to themselves, GKN Wheels & Structures's employees or representatives, or others.
- > Properly identify and assess all hazards and risks associated with the use of your products or services and ensure that adequate safeguards and working practices are in place to reduce or eliminate them.

- > Conduct your business in a way which safeguards the natural environment. You will comply with all applicable environmental laws and regulations, obtain and comply with all necessary environmental permits and properly dispose of all hazardous and regulated substances.

### LEGAL COMPLIANCE

- > Conduct your business in accordance with all laws and regulations of the countries in which you operate and to which you are subject, including but not limited to the examples set out below:
- > Comply with all applicable trade compliance regimes such as export, import, embargoes and sanctions
- > Comply with all applicable anti bribery and corruption legislation. You must never engage in any form of bribery or other corrupt practices on behalf of GKN Wheels & Structures
- > Comply with all applicable anti-trust and competition laws. You must not fix prices or rig bids with your competitors, allocate customers or markets, or exchange current, recent or future pricing information with or between them.

### OBSERVING THIS POLICY

- > Have appropriate policies and procedures in place to enable you to fully comply with this policy. These need not be identical to this policy, but as a minimum they must be consistent with its principles.
- > Provide GKN Wheels & Structures with any information it reasonably requests to demonstrate your compliance with this policy and certify your compliance with this policy on request.
- > Inform GKN Wheels & Structures if you become aware of any actual or potential breach of this policy, whether by you or any other person or company.
- > Have appropriate terms and conditions in your supply contracts to cascade these requirements down your supply chain.
- > Allow GKN Wheels & Structures employees and third party representatives to visit your premises and/or access your records and/or personnel on reasonable notice to audit and ensure compliance with the above requirements.

## Doing the right thing – what we expect from ourselves...

We recognise that doing the right thing is a two-way process. We expect high ethical standards of you and we expect the same of ourselves. Copies of the relevant GKN Wheels & Structures policies are available upon request from your GKN Wheels & Structures contacts. If you ever think that we may not be complying with our own policies, or are not **doing the right thing**, then please tell us.