

COMPLIANCE

# WALBAR CODE OF CONDUCT EMPLOYEES AND SUPPLIERS

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## 1.0 Introduction

- We demand high standards from ourselves and our colleagues in all aspects of our lives. This helps our customers know that they can rely on us to meet our commitments related to quality and on-time delivery.
- This Code of Conduct (the Code) sets out the **minimum standards of behavior and good practices that we require from our employees and suppliers.**
- We train all Walbar employees to ensure they fully understand and adhere to this Code, in addition to the provisions of the commercial terms agreed between Walbar with the employee or supplier.
- When local law, regulation, or rules impose additional requirements than this Code, providers must comply with those requirements.

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## 1.1 Purpose

- The Code specifies the minimum standards of behavior that Walbar requires of our employees and suppliers. The purpose of the Code is to **formally communicate Walbar's requirements and expectations of all our employees and to the entire global supply chain.**

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## 1.2 Content, scope and applicability

- The **Code applies to all employees, suppliers and partners** who supply products or services related to Walbar's contracts or purchase orders.
  - **Suppliers are expected to communicate these principles to their own suppliers** to ensure alignment through the supply chain.
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## 1.3 Ask questions and raising concerns

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- If any Walbar employee or supplier has an actual or potential ethical concern, they are encouraged to report it to Walbar.

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## 2.0 Respect for Human Rights and Workers' Rights

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- At Walbar, we have a deep respect for basic human rights. This applies to our customers, our employees, our suppliers and the communities within which we live and operate.
- All suppliers shall comply with applicable national and international laws and standards regarding **labor practice and human rights legislation, including slavery and human trafficking.**
- We believe that the employment option should be freely chosen.

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## 2.1 Slavery and human trafficking

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- Walbar and our Suppliers **shall never use or support practices that inhibit the development of children.**
- **We shall not employ people under the age of 18** or, when older, the compulsory school age in the country.
- Suppliers shall refrain from using any form of involuntary labor, including forced imprisonment or **debt-related labor.**

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## 2.2 Fair Pay and Benefits

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- We recognize the need to reward equitably for skill, contribution and performance.
- Suppliers **shall ensure that all wages meet local minimum wage requirements.**
- Any **overtime shall be voluntary**, and workers must receive adequate compensation for any overtime worked.
- Standard working hours must not exceed legal limits and over time shall not exceed the maximum permitted by law.

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## 2.3 Diversity and inclusion

- We strive to create an open environment where all employees are treated fairly and **offer equal opportunities, regardless of skin color, race, nationality, social background, disability, sexual orientation, political or religious convictions, gender or age.**
- We expect our suppliers to do the same for their employees.
- **We will not tolerate any form of harassment or discrimination** of any kind.

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## 2.4 Collective Bargaining

- The decision to join a union is individual as applicable in the company.
- Our suppliers are expected to respect the choices of their employees.

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## 3.0 Health and Safety

- Our employees are our most important resource, and **we strive to improve in all areas to ensure that no employee is injured in an accident.**
- We look for ways to minimize or avoid situations that can lead to repetitive use injuries.
- We empower everyone in our organization to be alert to situations that need to be corrected.
- We seek to control hazards and take the best reasonably possible precaution, measures against accidents and professional diseases.
- We are committed to **providing training** and ensuring that employees receive sanitary education and safety issues.
- We will establish and maintain reasonable occupational health and safety management **(seeking to foster a safe working environment).**
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## 4.0 Environmental Compliance and Commitment

- We are proud to meet or exceed all standards related to caring for our environment.
- We continually look for ways to reduce and minimize any **environmental impact or pollution**.
- We will act in accordance with applicable legal and international standards regarding environmental protection.
- We strive to minimize environmental pollution and make continuous improvements in environmental protection.

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## 5.0 Legal Compliance

- We take our legal compliance very seriously and enforce a strict prohibition on corruption, bribery and fraudulent acts in any form.
- We will not tolerate or **engage in any form of corruption or bribery**, including payment or other form of benefit conferred on any government official for the purpose of influencing law violation decisions.

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## 5.1 Compliance with WALBAR's Values of Ethics and Morals

- The personnel will work applying the ethics and in accordance with the values of Walbar.
- It will avoid any unhealthy behavior and activities that are considered fraudulent (trickery, cunning, abusive practice or breach of trust, intentionally perpetrated for profit or to obtain some unfair or dishonest advantage) that put at risk the integrity of people, the company and the products processed by it.
- These activities may result in injury to third parties, employees, loss of trust, loss of business, loss of customers, suspension of accreditations, legal penalties or catastrophic events resulting in fatality; etc.

# Code of Conduct for Employees and Suppliers

## 6.0 Community Engagement

- We truly care about our place in our local communities and strive to make Walbar a positive influence.
- We will seek opportunities for our company and our employees to participate in constructive projects and programs for the betterment of our community.

## 7.0 Supplier Commitment and Conflict Minerals Agreement

- We require our suppliers to adopt and comply with this code of conduct and comply with the principles of non-discrimination with respect to the selection and treatment of suppliers.
- We will also ensure that our Suppliers take reasonable steps to **prevent the use in their products of raw materials that directly or indirectly finance armed groups that violate human rights.**

## 8.0 Classification and Management of Information.

- Classification and Management of information and documents will be performed according to Industry, Customers and WALBAR requirements.
- Personnel is assigned to ensure the protection of information and to define restrictions and controls for its distribution.

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- ❖ Any failure by the employee, the company or supplier to any of the above-mentioned points, may incur some sanction or major consequences.
- ❖ When any breach results in fraudulent activities, the Operations Department will be responsible for monitoring and applying sanctions to the person (s) involved.
- ❖ Operations will review together with the Quality Department if there is any impact on the product and if it is necessary to communicate to any Customer, Certify Body, Nadcap or Legal entity. The methods of communication/self-disclosure will be according to the requirements of each interested party. Records shall be maintained.

## 10.0 Links:

KINETIC ENGINE SYSTEMS

<https://kineticengines.com/>

NADCAP - PRI

<https://www.eauditnet.com/eauditnet/ean/user/login.htm>

Rolls Royce Ethics Line

<https://www.rolls-royce.com/sustainability/ethics-and-compliance.aspx#/>