

1. Introduction

At Gooch & Housego we are committed to ensuring we adhere to the highest standards of business conduct, ethical behavior and compliance across our Group and as a supplier to Gooch & Housego it is essential we can rely upon your support in delivering our commitment through ensuring your own business and supply chain adhere to the same standard.

To ensure you are clear on what is expected we have prepared our Global Supplier Code of Conduct that sets out the minimum level of behaviors and practices we expect to see enforced throughout the supply base regardless of where you operate from. These same standards are adopted within our own facilities.

If you have any questions about the Supplier Code of Conduct please speak to your local contact and we will work with you to ensure the standards of the code are met. If you are aware of areas within your own business or your supply chain that currently may not be compliant please notify us immediately and we will work with you to implement corrective actions. In situations where we find suppliers violating the Code we will adopt a zero tolerance approach and terminate the business relationship.

2. G&H Requirements of its Suppliers

2.1 Legal Compliance

Suppliers shall comply with all applicable laws and regulations of the countries in which you operate and to which you are subject.

2.2 Human Rights

Suppliers must comply with applicable international and national laws and standards in relation to labor practices and human rights.

2.2.1 Child Labor

Suppliers must ensure that illegal child labor is not used in the performance of work. Suppliers must comply with local laws regarding the minimum age of employees. Suppliers must comply with all legal requirements for the work of authorized young workers, including hours of work, wages, working conditions, and the handling of certain materials.

2.2.2 Human Trafficking, including Forced or Indentured Labor

Suppliers shall not use any form of involuntary or forced labor. Suppliers shall not use, condone nor participate in any form of slavery or human trafficking.

2.2.3 Fair Pay, benefits and working hours

Suppliers must provide wages at least equal to the applicable legal minimum wage and any associated benefits. If there is no legal minimum wage suppliers must ensure that wages are comparable to those of similar companies in the local area. Suppliers must not exceed prevailing local work hours and must appropriately compensate overtime.

2.2.4 Non-Discrimination and Harassment

Suppliers are expected to promote equal opportunities for all and value diversity.

Harassment or discrimination towards employees, including all forms of physical, verbal or psychological abuse must not be tolerated.

2.2.5 Freedom of Association

Suppliers must respect the legal rights of employees to join or refrain from joining worker associations. Suppliers must also respect any legal right of employees to bargain collectively.

2.3 Anti-Corruption

Gooch and Housego has a zero tolerance policy for bribery and corruption and expect our suppliers:

- To behave ethically in all business dealings.
- Not offer, give or accept anything of value that may be viewed as, or has the effect of, improperly influencing business decisions.
- Not offer or give gifts or hospitality to any employee that is intended as, or may be viewed as, an attempt to improperly influence business decisions.
- Not make facilitation payments or permit them to be made on behalf of the supplier or Gooch and Housego.
- To comply with all applicable anti-bribery and corruption laws and regulations of the countries in which they operate.

2.4 Competition and Anti-Trust

Suppliers must comply with competition (antitrust) laws in the countries where they operate or sell product or services.

Suppliers must not co-ordinate market conduct with competitors or their own suppliers in a way that improperly restricts competition.

2.5 Conflict of Interest

Suppliers are expected to act fairly, objectively and avoid all conflicts of interest when conducting business with Gooch & Housego. Suppliers should immediately report, to your local contact, any potential, perceived or actual conflict of interest.

2.6 Information Protection

2.6.1 Intellectual Property

Suppliers will respect intellectual property rights worldwide and will utilize intellectual property only in accordance with the rights provided by the respective owners. Suppliers will safeguard and protect Gooch & Housego intellectual property and will not disclose or transfer any intellectual property or confidential information to any other party without written consent of the owner.

2.6.2 Information Security

Suppliers must comply with applicable data privacy laws.

Suppliers must ensure that all confidential and proprietary information, directly or indirectly related to Gooch & Housego and its stakeholders is protected appropriately.

2.7 Health, Safety and Environment

2.7.1 Health and Safety

Gooch & Housego are committed to a safety first culture to protect our people and those we work with. Gooch & Housego expects our suppliers to protect the health, safety and the welfare of their employees, contractors, visitors and others who may be affected by their activities.

2.7.2 Environment

Suppliers must comply with all environmental laws and regulations, obtain and comply with all necessary environmental permits and properly dispose of all hazardous and regulated substances.

2.8 Global Trade Compliance

2.8.1 Import and Export Controls and obligations

It is the policy of Gooch & Housego to fully comply with all applicable laws and regulations controlling the export (and related import) of military and commercial items, services and technology. It is therefore essential that all Gooch & Housego suppliers have business processes in place to demonstrate compliance with export and import laws, directives and regulations governing the export or import of parts, components, services, technology or technical data.

2.8.2 Conflict Minerals

Suppliers must comply with applicable laws and regulations regarding conflict minerals including tin, tungsten, tantalum and gold. Supplier's processes must assure that any tin, tungsten, tantalum and gold contained in products do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses. Suppliers are expected to exercise due diligence on the source and chain of custody of such minerals in accordance with international standards and make such due diligence measures available on request.

2.8.3 Counterfeit Parts

Suppliers shall establish systems that will stop any counterfeit products or materials being introduced to the supply chain. Traceability, inspection and certification of parts into Gooch & Housego is required.

2.9 Maintain Accurate Records

Suppliers are expected to maintain accurate and complete business records. Records should comply with all applicable and accepted accounting principles and statutory requirements.

2.10 Whistleblower Protection

Suppliers should provide their employees with avenues for raising legal or ethical issues or concerns, in a confidential environment and without fear of retaliation.

2.11 Suppliers and Subcontractors

Suppliers are responsible for ensuring that their lower tier supply base comply with this code. Gooch & Housego reserves the right to monitor, review and verify compliance with this Code.

Revision	Date	Description of change	Changed by
1.0	20/9/2018	First issue approval email ref GL_SC_002_LC_18_9_2018	Steve Love