



GLOBAL SUPPLIER CODE OF CONDUCT





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1. Introduction

1.1 Code of Conduct

The Welding Institute group of companies' (TWI Group) Global Supplier Code of Conduct demonstrates how we conduct ourselves to ensure that we promote and maintain the highest business standards throughout our global supply chain. This Global Supplier Code of Conduct is built on our Code of Conduct and defines the responsibilities of TWI Group suppliers and third parties. It also represents our values and behaviours below which we expect our suppliers to comply with as a minimum standard in addition to agreed commercial terms and conditions.

Guiding our Actions – Our Values and Behaviours

Our values provide a point of reference for the way we expect our people to operate and behave. They reflect in the way we do business with our customers and with each other.



INNOVATION AND EXPERTISE

Championing new ideas and sharing knowledge to solve industry problems



TAKING RESPONSIBILITY

Achieving our objectives and personal development



CUSTOMER FOCUS

Building trusting relationships with our customers



ADAPTABILITY

Engaging positively with change to meet the needs of the business



INCLUSION

Valuing the contribution from every individual, creating value for our customers



1.2 Scope

This Global Supplier Code of Conduct applies to all suppliers that provide goods and/or services to TWI Group. We expect suppliers to flow down these standards and expectations to any supplier they may work with in providing any goods and/or services or use to ensure compliance across the supply chain.

2. People

2.1 Health and safety

We are focused and committed to providing a healthy and safe working environment as it underpins everything we do.

Our expectations of you

To ensure we comply with our requirements on health and safety, suppliers are expected to:

- Comply with applicable health and safety standards and legislation;
- Establish health and safety policies and processes to ensure adherence to the requirements where production or work is undertaken; and
- Encourage its employees and supply chain to report any unsafe activity so that appropriate action may be taken.

2.2 Diversity and Inclusion

We are committed to supporting diversity and creating an inclusive working environment within TWI Group. Diversity refers to who are represented in the workplace and inclusion relates to how the workplace embraces all employees including their contributions. We recognise that for everyone to fully contribute at work, our workplace needs to be a place where everyone feels equally respected for who they are and what they contribute without fear of discrimination.

Our expectations of you

To ensure we comply with our requirements on diversity and inclusion, suppliers are expected to:

- Promote diversity and inclusion within the workplace environment to ensure everyone is treated fairly;
- Work with its employees and supply chain to build an awareness of diversity and inclusion to prevent discrimination; and
- Ensure employment decisions are based on ability and not characteristics.

2.3 Equal opportunity

We believe in treating everyone fairly, with respect and dignity, giving everyone an equal opportunity. TWI Group does not tolerate any form of discrimination, bullying, harassment or victimisation of others.

Our expectations of you



To ensure we comply with the requirements on equal opportunity, discrimination and harassment, suppliers are expected to:

- Provide equal employment opportunities for all employees;
- Take matters seriously regarding acts of bullying, harassment, victimisation and unlawful discrimination; and
- Review employment practices and procedures to ensure changes in the law are reflected.

3. Ethics and Integrity

3.1 Anti-bribery and corruption

TWI Group does not tolerate any form of bribery or corruption. Bribery is the offer, promise, giving, demanding or acceptance of an advantage as an inducement for action, which is illegal, unethical, or a breach of trust. Bribery acts can take many different forms, but typically, they involve corrupt intent. A bribe could be the direct or indirect promise of anything of value, the offer of a fee, reward or other advantage or the giving of a donation. Corruption is the misuse of power for personal gain. Acts of corruption may be considered a criminal offence and can include the misdirection of company funds into "shadow companies", the skimming of foreign aid money, scams and other corrupt activity.

Our expectations of you

To ensure we comply with our requirements on bribery and corruption, suppliers are expected to:

- At all times comply with anti-bribery and corruption laws and regulations where they do business;
- Carry out reasonable due diligence to identify and prevent bribery and corruption which includes its supply chain;
- Not offer, give, promise, request or receive any payment, benefit, gift or anything of value which is intended to be or may be construed as a bribe; and
- Prevent employees (or anyone who may act on behalf of the supplier) from offering, giving or receiving bribes or corrupt payments.

3.2 Fraud

The concept of fraud consists of deception and dishonesty. It is fraud when you attempt to deceive someone or act in a dishonest manner to gain an advantage of any kind. Fraud can also be used to obtain profit, property or services unjustly. TWI Group refuses to participate in any kind of fraud, deception or dishonest activity either directly or indirectly through suppliers.

Our expectations of you

To ensure we comply with our requirements on fraud and deception, suppliers are expected to:

- Not engage in fraud, deception or misleading conduct or allow others representing them to do so;
- Act with integrity and transparency at all times and not engage in activities which seek to defraud, steal or misappropriate any property or information; and
- Take immediate action to rectify the information and provide correct information where a supplier has identified a false or misleading statement or a material omission has been made.



3.3 Gifts and entertainment

TWI Group do not accept or provide gifts or entertainment in return for any business, services or confidential information or with the intention of influencing a decision from any supplier or third party.

Our expectations of you

To ensure we comply with our requirements on gifts and entertainment, suppliers are expected to:

- Not offer, accept or make facilitation or similar payments;
- Only offer gifts or entertainment in an open and transparent way;
- Not use gifts or entertainment as an opportunity to gain an unfair advantage;
- Ensure that the giving or accepting of any gift or entertainment is permitted by applicable laws or regulations, does not violate the rules or standards of the recipient business and is not intended to improperly influence business decisions; and
- Not accept cash equivalent for gifts or entertainment.

3.4 Conflict of interest

A conflict of interest arises where you would be compromising your professional judgment, influencing business transactions or decisions in the interest of your company. This also includes the perception of a conflict of interest, which could raise doubt on your integrity and could damage your company's reputation.

Our expectations of you

To ensure we comply with our requirements in relation to any conflict of interest, suppliers are expected to:

- Avoid all conflicts of interest or situations which could give rise to a potential conflict of interest;
- Disclose any actual or potential conflict of interest at the time of entering into a business relationship with any company in the TWI Group;
- Immediately notify us and all affected parties where an actual or potential conflict of interest has arisen; and
- Take all necessary steps to identify, mitigate and manage conflicts of interest.

3.5 Business records

Accurate record keeping and reporting reflects on our reputation and credibility, and ensures that we meet our legal, regulatory and governance obligations.

We maintain a rigorous system of financial, operational, compliance controls, and an effective system of risk management.

Our expectations of you

To ensure we comply with our recording requirements, suppliers are expected to:

- Have reasonable controls to ensure accurate records;
- Create, store and maintain business records and not alter any record in the attempt to conceal or misrepresent any transactions;
- Retain business records for the applicable retention legal requirements;
- Use appropriate diligence in preserving and maintaining documentation; and



- Comply with legal, financial, administrative and other obligations including reporting to tax or other authorities both in their country of operation(s) and (where applicable) internationally.

4. Governance

4.1 Compliance

Suppliers are expected to comply with all laws and regulations applicable to their business, including local laws and regulations of all countries outside their home country in which goods or services are provided. This includes a requirement to comply with all applicable tax laws and regulations where the supplier operates. Suppliers are not permitted to engage in deliberate illegal tax evasion or facilitate such evasion on the behalf of others. Suppliers are expected to ensure effective measures are implemented to minimise the risk of tax evasion or its facilitation.

4.2 Trade and Export control

We comply with all trade requirements, which exist within the countries in which we operate; this includes compliance with economic sanctions and import and export laws, regulations and procedures.

Our expectations of you

To ensure we comply with our requirements on export control and trade compliance, suppliers are expected to:

- Comply with applicable export and import laws and regulations when transferring goods, services, software or technology;
- Provide accurate export control classification, information and obtain export control licences;
- Seek authorisations or permits where applicable;
- Not perform any act which would cause any TWI Group company to be in violation of or exposed to consequences under export control regulations;
- Comply with national and international sanctions and embargoes; and
- Flow down these requirements across the supply chain as applicable.

4.3 Modern Slavery and Human Rights

Modern slavery is an abuse of human rights; it encompasses slavery, servitude, human trafficking and forced labour. TWI Group undertakes a stance of zero tolerance towards any form of modern slavery and continues to take measures to ensure that neither modern slavery nor human trafficking takes place within our business or supply chain.

We reserve the right to audit any of our suppliers for conformance. If we were to find evidence of a failure to comply, we will take immediate action, which will include terminating our relationship with the relevant supplier if appropriate.

A copy of our modern slavery statement can be found here: <https://www.twi-global.com/who-we-are/ethos-and-values/modern-slavery-statement#:~:text=Modern%20slavery%20is%20an%20abuse%20of%20human%20rights%3B,expect%20the%20same%20high%20standards%20of%20our%20suppliers>

Our expectations of you

To ensure we comply with our requirements concerning modern slavery and human trafficking, suppliers are expected to:



- Comply with all modern slavery and human trafficking legislation;
- Have adequate policies, risk awareness and due diligence processes in place to prevent modern slavery and forced labour throughout its supply chain;
- Provide their employees with a clearly written contract explaining their rights and responsibilities in relation to wages, working hours, benefits, work benefits and employment conditions;
- Prevent the use of child labour in any form within its supply chain; and
- Take all reasonable measures to prevent all involvement in modern slavery, human trafficking, forced, bonded or indentured labour within the supply chain in accordance with applicable laws.

4.4 Information protection and security

Our suppliers may have access to highly sensitive and confidential business and personal information.

4.4.1 Confidentiality

Suppliers are expected to ensure that all commercially sensitive, confidential and proprietary information are protected in line with applicable laws and regulations.

4.4.2 Intellectual Property

Suppliers are expected to comply with all applicable laws and TWI Group contractual terms governing intellectual property rights assertions, including safeguarding against unauthorised disclosure, misuse, mishandling, counterfeit, theft, fraud or improper disclosure.

4.4.3 Data Privacy

Suppliers are expected to comply with all applicable data privacy laws and regulations in relation to collection, storing, using, processing and transfer of personal data and information.

4.4.4 Cyber Security

Suppliers are expected to comply with all applicable cyber security regulations or standards to safeguard the integrity and security of their systems.

Our expectations of you

To ensure we comply with our requirements concerning information protection, suppliers are expected to:

- Not permit the use, disclosure or distribution of TWI Group information for any purposes beyond the scope of the contracted work with TWI Group company, without that TWI Group company's prior written consent;
- Prompt notification of any confidentiality or data breaches pertaining to TWI Group supplied information;
- Handle any TWI Group supplied classified or proprietary marked information in accordance with the appropriate legislation, policies and processes and/or as directed by TWI Group;
- Not receive or copy documents or material (including software) unless permitted to do so;
- Safeguard personal data and take the required steps to protect it from misuse; and



- Implement industry best practices to ensure their systems are secure.

4.5 Sustainable procurement

We expect our suppliers to be aware of, and support TWI Group in complying with its legal and contractual obligations under sustainable procurement and/or social value legislation.

Our expectations of you

To ensure we comply with our requirements concerning sustainable procurement, suppliers are expected to:

- Reasonably assist TWI Group in the understanding and reduction of supply chain impacts on our environment;
- Demonstrate upon request that any materials supplied to TWI Group meet international standards for responsible business practices and are conflict-free; and
- Promote best practice for sustainable procurement.

4.6 Environment

Our goal is to create a workplace where we cause zero harm to people, no damage to equipment, and where we minimise our impact on the environment and prevent pollution.

Our expectations of you

To ensure we comply with our requirements concerning the environment, suppliers are expected to:

- Seek opportunities to minimise the environmental impacts in providing goods and/or services;
- Have processes in place to address any areas of concern;
- Comply with all applicable environmental laws and regulations to protect the environment;
- Consider the costs and benefits of environmentally preferable goods/services as alternatives; and
- Explore opportunities for the reduction in waste management with the disposal, recycling and re-use of materials where appropriate.

A copy of our health, safety and environmental policy can be found here: <https://www.twi-global.com/who-we-are/corporate-governance/procurement>

5. Supplier's pledge

5.1 Duty to promote an awareness

Suppliers shall provide its employees with access to this Global Supplier Code of Conduct and ensure they are aware of the Speak Up reporting channel (see section 5.2). Suppliers are expected to share these requirements across the supply chain as part of standard business practices.

5.2 Speak Up

It is important that our suppliers can raise and discuss acts, or potential acts, of misconduct or genuine concerns over malpractice, illegal acts or compliance failures, with confidence (to 'Speak Up') without the fear of retaliation. By doing so, suppliers give us the opportunity to deal with the issue appropriately.



Suppliers can report genuine concerns over malpractice, illegal acts or compliance failures that they observe by emailing: speakup@twi.co.uk. Speak Up is managed and monitored by the Legal and People and Culture teams within TWI Group. Please note that normal contractual and/or payment issues should not be raised through this channel. For such queries, you should continue to speak to your main point of contact at TWI Group.

In parallel, we expect suppliers to provide employees and third parties with access to reporting channels to seek advice or raise concerns without fear of retaliation, which includes anonymous reporting. Suppliers are expected to take all whistleblowing concerns received seriously and where appropriate investigate further.

5.3 Violation of the code

Any breach of this code shall be deemed a material breach entitling a TWI Group company to terminate the business relationship and pursue corrective action to address the violation in relation to the supplier contracts.



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