	<p>Work Instruction WI 176</p> <p>SUPPLIER CODE OF CONDUCT</p>	<p>Reviewed by: Colin Selby</p>	<p>Date 01/02/2022</p>
		<p>Approved Martin Hudson</p>	<p>Date 10/02/2022</p>




HINDLE GEARS

SUPPLIER CODE OF CONDUCT

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Section A

Amendments

Individual pages of this work instruction carry a revision status. Control of this manual is by updating the revision status of individual sheets, with amendment data shown on the record below.

Date	Details of amendments Incorporated	Issued by	Revision status
13/07/2016	Original Issue	Chris Verity	01
01/02/2022	Align with AS requirements	Martin Hudson	02
14/02/2023	Control of changes inserted	Colin Selby	03
31/01/2024	EU sanctions against Russia	Colin Selby	04
09/02/2024	REACH Regulations	Colin Selby	05
12/02/2024	Conflict Minerals Regulation	Colin Selby	06

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This Supplier Code of Conduct sets out the standards Hindle Gears Ltd expects suppliers to adopt as a minimum. Hindle Gears Ltd strives to operate with honesty, integrity and openness in all areas of the business, including, but not limited to, employee rights and safety, customers and suppliers.

1. Quality System Requirements

The supplier shall implement and maintain a quality management system.

The supplier must make Hindle Gears Ltd aware of the suspension or withdrawal of any quality accreditations with 72 hours of notice.

Where stated on a purchase order goods must be accompanied by detailed certification and/or reports requested.

The following details must be supplied with goods when requested on the order

Purchased items

- Delivery note and, where applicable, certificate of conformity detailing Hindle Gears Ltd's
 - Order number
 - Part number
 - Quantity and unit of measure
 - Details of any approved deviations
 - A statement confirming compliance
- Mill certificate for raw material
- Certification of any third party operations carried including, but not limited to, heat treatment, surface finishing,

Sub Contract Services

- Certificate of Conformity detailing Hindle Gears
 - Order number
 - Part number
 - Job Number – JN*****
 - Details of work carried out


All records pertaining to the order must be retained indefinitely and made available upon request.

Suppliers must also comply and adhere to any additional requirements that may be defined by the purchase order.

2. Control of Non-Conforming Product

The supplier must maintain a documented system for the control of non-conforming product.

The supplier must ensure that no non-conforming parts are delivered to the company.

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The supplier must make the company aware if non-conforming parts are identified prior to delivery. Goods must not be delivered unless a concession is granted by the company. This must be detailed on all documentation pertaining to the goods.

Any rework/rectification processes must be detailed to Hindle Gears Ltd and be approved prior to it taking place. This must be detailed on all documentation pertaining to the goods.

In the event of an escapement, the supplier must take action to identify all potential non-conforming parts within 24 and advise a containment plan to capture all instances. In the event of non-conforming product, Hindle Gears Ltd reserves the right to request a corrective action report, to be supplied within the time frame laid by Hindle Gears Ltd.

3. Restriction of Use of a Third Parties

Unless written authority is granted the supplier must not use 3rd parties in the manufacture and supply of products / services to Hindle Gears.

Any 3rd parties employed must be fully approved by the supplier

The supplier is expected to monitor the performance of all sub-tier suppliers and service providers.

4. Change to Process

Without agreement the supplier may not undertake a change to process without authorisation from Hindle Gears Ltd. Change may include, but not be limited to:


- Processes.
- Production equipment.
- Tooling
- Material
- Software program
- Sub contractor processes, service provider, change of location.
- Packaging

5. Flow of Information

The supplier must ensure the flow of information to all sub tier suppliers / service providers of all requirements of the purchase order where authority to use 3rd parties is granted.

6. Rights of Access

Representatives of Hindle Gears Ltd, it's customer and regulatory bodies may enter the suppliers premises or any facility involved in the an order for Hindle Gears Ltd for the purposes of inspection, audits, WIP checks and any other activities deemed necessary. This requirement must flow down all levels of the supply chain.

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7. Foreign Object and Debris (FOD)

All goods delivered to Hindle Gears Ltd must be free of any Foreign Object Debris. The company reserves the right to reject goods on this basis.

8. Counterfeit Goods Policy

Hindle Gers Ltd recognizes the dangers of Counterfeit, Fraudulent and Suspect Items (CFSI) within the supply chain and the impact of such products of safety. All suppliers must ensure all members of the team involved in procurement of goods and service are have been duly informed of the potential for inadvertently purchasing CFSI products and have been instructed to source parts directly from manufacturers or recognized distributors.

9. Health and Safety

The supplier shall appoint a manager to oversee the health and safety within the supplier’s site or a given site. There shall be a structure and procedures in place to manage all health and safety issues.

Training shall be provided for all employees in relation to health and safety in the workplace specific to the company. All employees shall be made aware of their contribution towards safe working practices and actively encouraged to report any health and safety concerns.

There shall be procedures in place to prevent, manage, track and report occupational injuries and illness.

10. Human Rights

The employer shall respect the human rights and dignity of all employees.

The employer shall not employ forced labour, including prison labour, victims of slavery or human trafficking.


All employees must be free to terminate their employment at any time and be free to leave of their own volition.

The employee shall be paid in line with local laws and regulations, in a timely manner, which shall be clearly communicated to them

All working hours shall fall in line with the local laws and regulations. All employees shall be entitled to minimum one day off per week, uninterrupted.

The employer shall ensure to prohibit all threatening, exploitative and abusive behaviour

All employees shall have the right to representation by a trade union and have the power of collective bargaining.

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The company shall not discriminate based on gender, age, nationality, ethnicity, religion, disability, sexual orientation, marital status, political views or union membership.

The employer shall ensure that the minimum age of an employee does not contravene the local laws and regulations.

The company's disciplinary procedure must be clearly laid out for all employees and be freely available.

11. Business Ethics and Integrity

All business conducted by the company shall refrain from any form of corruption, bribery and extortion and must be in line with anti-bribery, anti-trust and competition laws.

The company shall respect and protect the interests of Hindle Gears Ltd including, but not limited to, non-disclosure of confidential information provided by Hindle Gears Ltd and the intellectual property of Hindle Gears Ltd.

12. Trade sanctions adopted by EU 2023/1214 23rd June 2023

Trade sanctions in relation to the prohibition to import or purchase in the European Union products processed in a third country using iron and steel inputs originating in Russia.

Our supply chain partners are therefore expected to provide such country of origin evidence of the products and the iron and steel inputs so used with the shipping/delivery documents.


The provided evidence must as a minimum, meet standard EN 10204: 2004 3.1 or equivalent standard as recognised and accepted by EU member countries custom authority.

13. REACH Regulations

Our service providers must identify and manage the risks presented by substances they purchase or manufacture and place on the market in GB. They must be able to demonstrate how the substance can be used safely and you must communicate the risk management measures to the users.

The service provider will need to consider their role in the supply chain in GB and the usage of chemicals to determine what their obligations may be.

REACH stipulates that **chemical substances that exceed 1 tonne per year per company must be registered with ECHA**. In this process, companies must identify the risks linked to the substances they handle and indicate how they manage them. This obligation applies to both substances and mixtures.

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14 Conflict Minerals Regulation

Our service providers must identify and acknowledge the requirements stated:

On 1 January 2021 a new law called the EU Conflict Minerals Regulation, came into full force across the EU. The Regulation requires EU importers of tantalum, tin, tungsten, and gold to source from responsible and conflict-free sources only. The EU Regulation aims to ensure that importers carry out supply chain due diligence to limit the acquisition of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high risk areas.