

CONCEPT • CASTING • COMPLETION

Supplier Code of Conduct

(GSC- POL023 Issue 1)



GOODWIN STEEL CASTINGS
ESTABLISHED 1883

Message from the Managing Director

Through sustained investment in our people, our facilities and our markets, Goodwin Steel Castings Limited (“**Goodwin**”) is a world leader in large precision project engineering, and the design and manufacture of valves for use in the world’s hydrocarbon, energy and process industries. We work hard never to lose focus of our client’s requirements, offering exemplary customer service throughout the lifecycle of a project.

Here at Goodwin, we never stand still. We are always working to improve our processes and methodologies whilst maintaining our edge and competitive ability. We are committed to maintaining the highest levels of compliance, behaviours and ethical standards. We will not tolerate improper business conduct of any sort, either from our own people or our suppliers.

This Supplier Code of Conduct (“Code”) is based upon our own principles, policies and standards. It sets out the behaviours and practices that Goodwin expects from its suppliers, and that of the wider supply chain, in order to operate ethically and responsibly and in full compliance with all applicable laws and regulations.

At Goodwin we operate in compliance with this simple set of values and need your support as our suppliers to ensure that together we are successful and live up to the expectations of our clients.

Thank you,



Bernard Goodwin
Managing Director

Supplier Code of Conduct



Contents

Message from the Managing Director	2
1. Scope and Applicability	4
2. Code of Conduct.....	4
Conflict of Interest.....	4
Health, Safety and Environment (HSE).....	4
Anti-bribery and Corruption.....	5
Modern Slavery and Human Rights	5
Equal Opportunities	5
Responsible Sourcing.....	6
Accurate Business Records	6
Safeguarding our IP and the confidential information of others	6
The Rights and Privacy of individuals	6
Trade Compliance	7
Counterfeit, Fraudulent and Suspect Items.....	7
3. Supplier Commitment.....	8
Communication	8
Adherence	8

1. Scope and Applicability

Goodwin set high standards for the way in which it operates and has a zero tolerance policy when it comes to unethical business behaviour. This Code sets out the minimum standards of practice and behaviour expected from its suppliers.

Goodwin chooses its suppliers carefully and expects that they adhere to this Code, comply with all applicable laws and regulations and satisfy any contractual requirements (whether commercial or technical), agreed between the supplier and Goodwin. Where local laws, regulations or rules impose stricter requirements than those detailed in this Code, suppliers shall comply with those stricter requirements.

This Code is applicable to all suppliers who supply products or services related to Goodwin contracts or purchase orders.

Goodwin's suppliers are expected to cascade the principles set out in this Code to their own suppliers to ensure alignment throughout the supply chain.

2. Code of Conduct

Conflict of Interest

Our Principles:

Goodwin avoid any relationship, influence or activity which may impair, or give the impression of impairing the ability make fair and objective decisions in the conduct of Goodwin's business or the ability to act in the best interests of the company. If there is a perceived conflict of interest, then we speak up.

Supplier Expectations:

Our suppliers must conduct their business free from conflicts of interest or mitigate any perceived conflicts as and when they arise.

Health, Safety and Environment (HSE)

Our Principles:

Goodwin believes that maintaining high standards of HSE management are an integral part of the business performance and are given equal standing with other business objectives. We are committed to fulfilling the HSE needs and expectations of interested parties and their compliance obligations, and to providing a safe and healthy working environment for its employees, contractors, visitors and anyone else affected by our activities.

Supplier Expectations:

All suppliers must make the necessary steps that meet or exceed legal standards for the health, safety and welfare of employees, contractors, visitors and those in the community who may be affected by the company operations. Suppliers shall comply with all applicable laws and regulations and should implement best industry practice wherever possible.

Suppliers must also adopt policies, procedures or practices that aim to minimise any potential negative impacts on the environment and communities that surround them.

Anti-Bribery and Corruption

Our Principles:

It is Goodwin policy to conduct all business in an honest and ethical manner. Goodwin takes a zero-tolerance approach to bribery and corruption at all times. Goodwin will never offer, give or accept anything of value that is, or could be seen as, influencing business decisions, imposing a sense of obligation on the recipient, would cause embarrassment if become public and/or contravene any applicable anti-bribery and corruption laws or regulations.

Supplier Expectations:

It is expected that all suppliers shall conduct business honestly, ethically, free from any bribery or corruption and in accordance with all applicable laws and regulations. Suppliers must never offer, give or accept anything of value (including money, gifts or hospitality to Goodwin employees) which contravene applicable anti-bribery and corruption laws or regulations or in an attempt to improperly influence business decisions.

Modern Slavery and Human Rights

Our principles:

Goodwin is committed to ensuring that it does not undertake any activity which contravenes human rights. We have a 'zero tolerance' policy on:

- the use of any type of forced or involuntary labour,
- human trafficking,
- discrimination on the basis of gender, colour, race, national origin, religion, sexual, orientation, age, disability or gender identity,
- threatening, abusive, sexual or exploitative behaviour,
- any activity that contravenes applicable laws and regulations (such as the Modern Slavery Act 2015).

Supplier Expectations:

It is expected that our suppliers are also committed to having a zero tolerance approach to human rights abuses and having the necessary policies and/or practices in place that ensure compliance with any applicable laws and regulations.

Equal Opportunities

Our principles:

It is Goodwin policy to ensure that the company has access to the widest labour market possible and secures the best possible employee's for its needs. We ensure that no applicant or employee receives less favourable treatment and that wherever possible, they are given the support needed to attain their full potential to the benefit of both themselves and the company.

Supplier Expectations:

Suppliers are expected to promote equal opportunities for all and value diversity. Discrimination towards employees, including all forms of physical, verbal or psychological abuse must not be tolerated.

Responsible Sourcing

Our principles:

Goodwin is committed to the responsible sourcing of materials to comply with regulatory and customer requirements.

Supplier Expectations:

Suppliers shall endeavour to supply products made from materials, including constituent minerals (tin, tantalum, tungsten and gold – otherwise known as 3TG), that are sourced responsibly and verified as 'conflict free'.

Supplier shall provide Goodwin with supporting data on their supply chain of minerals when requested.

For more information, visit www.responsiblemineralsinitiative.org.

Accurate Business Records

Our principles:

Goodwin maintain accurate and complete records of our business transactions.

Supplier Expectations:

It is expected that suppliers maintain accurate and complete records of their business transactions with Goodwin and provide copies of relevant records on request.

Safeguarding our IP and the confidential information of others

Our principles:

Goodwin's intellectual property and commercially sensitive and confidential information are vital assets to our business and are protected from unauthorised access, use and disclosure. This includes the protection of all confidential information we hold from customers, partners and other parties. We use and share this information internally to the extent that we are permitted to, and only share it externally with the relevant authorisation.

Supplier Expectations:

Suppliers must safeguard Goodwin's intellectual property and commercially sensitive and confidential information and ensure that all data and documents are kept secure to prevent its disclosure, theft, damage or unauthorised use. It shall be handled as a minimum, in accordance with the restrictions in any confidentiality or non-disclosure agreements in order to protect either Goodwin's or its customer's proprietary information.

The Rights and Privacy of individuals

Our principles:

Goodwin is committed to a policy of protecting the rights and privacy of individuals, for whom it holds information on, in accordance with data protections laws including the General Data Protection Regulation 2016 ("**GDPR**").

Supplier Expectations:

In some instances, suppliers may need to process certain data (including *personal data* under GDPR) and information about its employees, customers, suppliers and other individuals with whom it has a relationship with for legitimate business purposes. Suppliers must process and safeguard any personal data held in a manner which protects the rights and privacy of data subjects in accordance with all applicable data protection regulations including GDPR.

Trade Compliance

Our principles:

Goodwin is committed to compliance with all relevant laws, regulations and rules governing international trading activities such as export controls, trade restrictions, anti-boycotts and sanctions and obtains the export licences or permits required.

Supplier Expectations:

Suppliers shall comply with all relevant laws, regulations and rules governing international trading activities such as export controls, trade restrictions, anti-boycotts and sanctions and plan for and obtain all necessary licences, authorisations and/or permits required to ensure timely and compliant delivery of their products.

Counterfeit, Fraudulent and Suspect Items

Our principles:

It is Goodwin's policy to not purchase materiel whose origin, age, composition, configuration, certification status or other characteristic has been falsely represented by misleading marking, documentation or other means that fail to disclose relevant information.

Supplier Expectations:

Suppliers shall have in place a policy or process regarding counterfeit, fraudulent and suspect items. If a supplier suspects that any items they have supplied, are potentially counterfeit, fraudulent or suspect, they must notify Goodwin immediately so such items can be appropriately quarantined pending investigation and disposition as to its status.

3. Supplier Commitment

Communication

Suppliers shall make the content of this Code available to all of its employees and officers including any temporary or agency workers and contractors (“**Staff**”).

Suppliers are also required to flow down the expectations of this Code throughout their own supply chain via a methodology that is part of routine sustainable business practice.

Adherence

Suppliers shall conform to all aspects of this Code, as mandated through the Goodwin conditions of purchase.

Goodwin reserve the right to assess the supplier against compliance with this Code and it is expected that documentation is kept that demonstrates compliance. Goodwin may request access to that documentation at any time and may also request access to supplier sites for assessment purposes.

Suppliers will have a system for their Staff to report any concerns of non-compliance with this Code without fear of retaliation. The supplier will appropriately investigate all reports and take the necessary corrective actions. Suppliers must prohibit retaliation against individuals who have raised concerns honestly.

Subject to any restrictions imposed by applicable law, suppliers are encouraged to report any concerns or raise any questions relating to this Code with Goodwin.

If you wish to raise a concern, please do so via your Goodwin point of contact or should you wish to report a concern online, then you can do so through the Goodwin website at:

<https://www.goodwinsteelcastings.com/suppliers>

You may make a report anonymously, if preferred. However, please keep in mind that it is helpful for you to identify yourself so Goodwin may contact you for further information. Rest assured that any reports are treated confidentially to the extent reasonably possible and allowable by local laws.