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	Document Number:	CPM 13.04
	Document Owner	M.Pearce
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Introduction

The NARMCO Group of Company's (hereafter referred to simply as The NARMCO Group) operating philosophy is to become a market leader in the Global Automotive Industry in metal products, and modular assemblies and related services.

As a manufacturer, The NARMCO Group is visible to all types of businesses and operates with a global impact through our services and supply chain. We believe that a strong commitment and a strategic approach to sustainable development is essential for managing the challenges and opportunities of a rapidly changing global environment.

We view our suppliers as partners and care about the way they do business. The NARMCO Supplier Code of Conduct ("code") is a result of our ambition to establish a proactive collaboration with our suppliers in the promotion of lawful, professional, and fair practices that integrate the respect for human rights, business ethics and the environment.


Our suppliers' performance and alignment to high standards of business is an important and impactful part of the value chain for The NARMCO Group. We anticipate that suppliers would communicate the code to related entities, suppliers and subcontractors who support them in supplying to The NARMCO Group, so that they are aware of and understand the standards set within the code.

We are committed to engaging with our suppliers to evaluate their performance, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.

Thank you for your continued efforts and collaboration with The NARMCO Group.
Please direct all questions about this code to: The NARMCO Group

Responsibility:

Corporate Purchasing Agent

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SUPPLIER CODE OF CONDUCT

Commitment

NARMCO Group is committed to sustaining the highest legal, environmental, ethical, and professional standards consistent with the Ten Principles of the UNGC in the areas of human rights, labour, environment, and anti- corruption.

This supplier code has been developed with recognition of the Ten Principles, national legislation and NARMCO policies already embedded within the group.

General Disclaimer: The expectations set forth in this Code are not intended to conflict with or modify the general terms and conditions of your contracts with any of The NARMCO Group of Companies. If a contract requirement is more restrictive than this Code, you must comply with the more restrictive contract requirement.

Suppliers should report any non-compliance with these guidelines to The NARMCO Group. How to report can be found on the NARMCO website <https://www.narmco.com/wp-content/uploads/sites/23/2024/02/The-NARMCO-Group-Whistle-Blower-Protection-Policy.pdf> . Suppliers should have an avenue for their own employees to report as well as sub-suppliers.


Application

This code must be applied to all suppliers and their employees, agents, and subcontractors (collectively referred to as “suppliers”) that produce goods and/or provide services for The NARMCO Group.

Evaluation

NARMCO Group has established specific supplier expectations regarding supplier performance with the code. We will continue to evaluate suppliers on capability and commercial awareness, while taking into consideration the ability to meet the objectives and expectations of the code.

Our code is based on the following standards/principles:

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1. Governance and Ethics

The NARMCO Group expects suppliers to:

- 1.1. Comply with all relevant regulatory requirements regarding all areas of their business and its operations, including but not limited to all laws and regulations applicable to the operation of your business, corporate governance, occupational health and safety, labour standards and environmental management.
- 1.2. Act in an ethical, fair, and professional manner in all engagements with The NARMCO Group and its stakeholders, and report instances where these standards are breached or are likely to be breached.
- 1.3. Have in place relevant and appropriate policies and operational procedures to manage the environmental and social impacts of its business and to promote continuous improvement.
- 1.4. Provide accurate information regarding its business activities, labour, workplace health and safety, and environmental practices and disclose such information, without forgery or misrepresentation, when requested.
- 1.5. You must respect the legitimate proprietary rights and intellectual property rights of NARMCO and others. You must take proper care to protect sensitive information, including confidential, proprietary, and personal information. You should not use such information for any purpose other than the business purpose for which it was provided unless the owner of the information provided prior authorization.
- 1.6. Suppliers should comply with applicable restrictions on the export or re-export of goods, software, services and technology, as well as with applicable restrictions on trade involving certain countries, regions, companies or entities and individuals.

2. Human Rights

The NARMCO Group respects human rights as set out in the Universal Declaration of Human Rights and on top of that we have our Human Rights Statement. We require our employees to treat others with fairness, respect, and equity.

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The NARMCO Group expects suppliers to respect the rights of their employees and to comply with all relevant legislation, regulations, and directives in the country in which they operate. Suppliers should avoid any form of threats, intimidation, and physical or legal attacks against stakeholders.

2.1 Forced and Child Labour

The UNGC defines forced and compulsory labour as “any work or service that is exacted from any person under the menace of any penalty, and for which that person has not offered himself or herself voluntarily. Providing wages or other compensation to a worker does not necessarily indicate that the labour is not forced or compulsory. By right, labour should be freely given, and employees should be free to leave in accordance with established rules”.

The NARMCO Group expects suppliers to:

- a) Not use any involuntary labour.
- b) Employ only workers who meet the applicable minimum legal age requirement.
- c) Comply with all other applicable child labour laws.

2.2 Wages, Benefits, and Hours

The NARMCO Group expects suppliers to:

- a) Set working hours, wages and overtime pay in compliance with all applicable laws.
- b) Pay all employees at least the minimum legal wage or a wage that meets local industry standards, whichever is greater, or a “living wage”.
- c) Provide benefits which meet or exceed the minimum legislative standards in their operating jurisdictions including the provision of paid holidays, paid overtime, paid vacation and time free from work

2.3 Working Conditions


The NARMCO Group expects suppliers to:

- a) Provide all employees with a safe and healthy environment.
- b) Comply with all applicable laws and regulations regarding working conditions.

2.4 Freedom of Association

The NARMCO Group expects suppliers to:

- a) Freely allow their employees to associate with others, form and join (or refrain

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- from joining) organizations of their choice, and bargain collectively.
- b) Ensure that their employees have a mechanism to report grievances and that facilitates open communication between management and employees.
- c) Not engage with Private or Public forces to protect the business that may lead to violations of human rights.

3. Work Health and Safety

The NARMCO Group has a commitment to providing a working environment for all employees, contractors, clients, and visitors.

The NARMCO Group expects suppliers to:


- 3.1.** Comply with all relevant legislation including the relevant Work Health and Safety Regulations.
- 3.2.** Treat occupational health and safety of employees as a priority throughout all significant aspects of its activities.
- 3.3.** Help and support their employees to stay both vital and productive.
- 3.4.** Take appropriate action, such as policies, standards, procedures, contingency measures, and management systems, to prevent occupational illnesses and work-related accidents and to provide a safe and healthy workplace to its employees.

4. Diversity and Inclusion

The NARMCO Group recognizes the value of diversity, and the benefits which diverse businesses can bring as suppliers to the Firm, our clients, and our communities. The NARMCO Group treats partners and employees fairly and does not discriminate.

The NARMCO Group expects suppliers to:

- 4.1.** Not discriminate and harassment against any employee based on race, religion, age, gender, national origin, citizenship status, marital status, sexual orientation, gender identity, disability, pregnancy, other legally protected status including minorities and indigenous people, in hiring and employment practices.
- 4.2.** Share The NARMCO Group's vision for more gender-balanced teams and strong female gender representation, including at the senior leadership level.
- 4.3.** Demonstrate progress to improve gender equality at all levels.
- 4.4.** Demonstrate progress to improve equality for the disabled.

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5. Environment

The NARMCO Group recognizes that the long-term success of our business, viability of our communities and biological systems on which we depend are threatened by a range of environmental issues – including GHG emissions, energy efficiency, renewable energy, decarbonization, climate change, water quality and consumption, water scarcity, depletion of natural resources and associated biodiversity loss. We encourage our suppliers to minimize their environmental impact while doing business, and to support and encourage others where they can meaningfully do so.

Suppliers should seek to conduct their business in an environmentally responsible way. Suppliers must have the appropriate management procedures in place to comply with all environmental laws. And where appropriate, support The Narmco Group’s efforts to reduce its adverse environmental impacts including air quality, responsible chemical management, sustainable resource management, waste reduction including recuse and recycling, animal welfare, biodiversity, land use and deforestation, land, forest and water rights and forced eviction, soil quality, and noise emissions.

The NARMCO Group expects suppliers to:

- 5.1. Comply with applicable environmental laws, regulations, and standards.
- 5.2. Demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide.
- 5.3. Have in place an effective environmental policy, statement, or program to mitigate these risks, the implementation of which should be evident throughout all levels of the company.
- 5.4. Demonstrate commitment to reducing their negative environmental impacts and provides visibility to their progress toward this commitment.
- 5.5. Encourage the development and use of environmentally friendly technologies and practices and the reduction of negative environmental impacts throughout their supply chain.

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6. Supplier Diversity

The NARMCO Group is committed to supporting a culture in which diversity is valued internally and externally. We support supplier diversity through engagement with local businesses and social enterprises with relevant business offerings.

7. Business conduct

Integrity is vital for a sustainable relationship with all our stakeholders. We expect our suppliers to: Act with integrity, constantly striving to uphold the highest standards of ethical practice.

- 7.1. You must compete strictly based on the merits of your products and services. You must not pay a bribe in any amount, to anyone, anywhere, for any reason whatsoever, whether on The NARMCO Group's behalf, your behalf, or on behalf of others. Accordingly, you must never offer, promise, authorize, or provide, directly or indirectly, anything of value (including business gifts or courtesies) with the intent or effect of inducing anyone to forego their duties and provide unfair business advantage to The NARMCO Group, you, or others. This includes facilitating payments.
- 7.2. You must not engage in any anti-competitive conduct for any reason whatsoever, whether on The Narmco Group of Companies behalf, your behalf, or on behalf of others. Accordingly, you must never rig bids, fix prices, or allocate customers or markets, or exchange The Narmco Group of Companies or your competitively sensitive information with Narmco's competitors or your competitors. You must also refrain from abusing your market power, whether for your benefit or for the benefit of others, by refusing to deal, engaging in predatory or discriminatory pricing practices, conditioning the sale or provision of a particular product or service with that of another product or service, or undertaking similar abusive tactics.
- 7.3. You must not engage in other deceptive or unfair market practices, whether on The Narmco Group of Companies behalf, your behalf, or on behalf of others. Accordingly, you must never make misrepresentations regarding your products or services, or the products or services of others. This will include but not be limited to counterfeit parts.
- 7.4. Adhere to all applicable laws and regulations. Avoid any conflicts of interest and never participate in improper practices such as bribery, money laundering, and extortion.

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8. Continuous Improvement

The standards of conduct described in this code are critical to the ongoing success of The NARMCO Group. Where applicable, we will support suppliers in the establishment of best practices to meet and exceed the standards outlined in the code.

As a supplier to The NARMCO Group, the supplier's role begins, but does not end, with understanding this code. If any compliance issues arise that raise any questions, the supplier has the responsibility to bring them forward.

9. Acceptance


By signing the NARMCO Framework Agreement, the supplier acknowledges having read, understood, and accepted the required principles of decent business conduct as described in the supplier code. The NARMCO Group expects its suppliers to fulfill the key elements by incorporating them in their own business practice.

10. Corrective Action Process

The NARMCO Group expects its suppliers to adhere to and to live by the principles of the supplier code and prefers a continuous improvement approach with its suppliers. In cases of non-compliance, The NARMCO Group will apply ways and means to correct the non-compliance with the supplier. The supplier will establish a process for the timely correction of deficiencies identified. The supplier will provide The NARMCO Group with a written report detailing identified deficiencies and a corrective action plan. If there is no commitment or lack of corrective measures, such may result in The NARMCO Group ceasing to do business and as a final resort terminate contracts with the supplier.

11. Review

This code will be reviewed periodically as changes arise.

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Revision History

E-Revision # - 00
Date Revision - 11/19
Description - Initial release.

E-Revision # - 01
Date Revision - 08/21
Description - Added details into the Human Rights section.
- When the code of conduct will be reviewed.

E-Revision # - 02 – Chris Patten
Date Revision - 01/23
Description - Add 1.6
- Add statement to 2.0
- Update Wages, Benefits and Hours (2.2)
- Add 2.4c)
- Update to Diversity & Inclusion (4.1)
- Update to Environment (5)
- Update to Business Conduct (7.4)
- Update section 11

E-Revision # - 03 – LeighAnne Denorme
Date Revision - 02/25
Description - add reference to CPM 0.29 Whistleblower policy