

Procurement and Corporate Responsibility Policy for Suppliers:

Continental Product Engineering Ltd (CPE) has adopted its own business principles and code of conduct for corporate and procurement responsibility which sets out its commitment to acting with integrity and in a professional and fair way in the course of doing business. It also expects its business partners and suppliers (“Suppliers”) to adhere to the same principles wherever they work in the world. The Company will engage with its Suppliers to manage the social, environmental and ethical impact of its activities in the different markets in which it operates and to ensure that customer experiences and business partnerships are enhanced. To this end Suppliers must ensure that they promote the application of this Policy throughout their own supply chain and the Company will monitor performance and take appropriate action if it believes its standards are not being observed.

The key elements of the Company’s policy are fundamental to its business dealings and its relationship with its Suppliers. Accordingly, Suppliers with whom the Company contracts, are required to comply with the terms of this policy as set out below

This policy will be reviewed annually by a Company Director and the results recorded on the CR Review document

Key Elements:

Business principles/code of conduct

The Supplier warrants that:

- it has a set of business principles or a code of conduct that applies across its company including subsidiaries which establishes the minimum standards to which the company will operate
- such business principles include a commitment to operate with professionalism and integrity.
- such business principles commit the Supplier to manage the social, environmental and ethical impact of its business.

Focusing on health, safety and security

The Supplier warrants that it has:

- a robust health and safety management system (“HSMS”) in place ,
- board level accountability,
- measuring and reporting.

Suppliers’ HSMS should preferably be based on externally verified international standards such as ISO.

Tackling climate change and environmental impact

Suppliers are required to actively manage their own environmental impact and where possible, help the Company to meet its environmental goals

The Supplier warrants that it has a robust environmental management system (“EMS”) in place including but not limited to its commitment to reduce its impact on the environment to achieve this it;

- has board level accountability for environmental impact; and
- undertakes detailed measuring and reporting of its environmental impact.

Suppliers’ EMS should preferably be based on externally recognised EMS such as ISO or EMAS.

Respecting Human Rights

Unless otherwise required or prohibited by law, the Supplier warrants, to the best of its knowledge, that:

- it does not employ engage or otherwise use any child labour in circumstances such that the tasks performed by any such child labour could reasonably be foreseen to cause either physical or emotional impairment to the development of such child;
- it does not use forced labour in any form (prison, indentured, bonded or otherwise) and its employees are not required to lodge papers or deposits on starting work;
- it provides a safe and healthy workplace, presenting no immediate hazards to its employees. Any housing provided by the Supplier to its employees is safe for habitation. The Supplier provides access to clean water, food, and emergency healthcare to its employees in the event of accidents or incidents at the Supplier's workplace;
- it does not discriminate against any employees on any ground (including race, religion, disability or gender).
- it does not engage in or support the use of corporal punishment, mental, physical, sexual or verbal abuse and does not use cruel or abusive disciplinary practices in the workplace;
- it pays each employee at least the minimum wage, or a fair representation of the prevailing industry wage, (whichever is the higher) and provides each employee with all legally mandated benefits;
- it complies with the laws on working hours and employment rights in the countries in which it operates;
- it is respectful of its employees right to join and form independent trade unions and freedom of association.

CPE shall ensure that it has ethical and human rights policies and an appropriate complaints procedure to deal with any breaches of such policies.

Slavery and human trafficking

CPE is committed to driving out acts of modern day slavery from within its own business and that from within its supply chains. The Company acknowledges responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

Within the supply of goods there are relationships with external businesses for the sourcing of products. These as well as the suppliers of services make up the supply chains with CPE.

As part of the companies' due diligence processes into slavery and human trafficking, the supplier approval process will incorporate a review of the controls undertaken by the supplier.

Imported goods from sources outside of the UK and EU are potentially more at risk for slavery / human trafficking issues. The level of management control required for these sources will be continually monitored.

The company will not support or deal with any business knowingly involved in slavery or human trafficking.

The company Directors and senior management shall take the responsibility for implementing this policy statement and its objectives and shall provide adequate resources and investment to ensure that slavery and human trafficking is not taking place within the organisation within its supply chains.

Ensuring integrity in our business transactions

The Company will not engage in bribery or any form of unethical inducement or facilitation payments and will not tolerate or accept any such behaviour from its suppliers.

CPE, therefore, warrants that

- it has in place a policy on anti-corruption that applies across the company, including subsidiaries.
- the policy prohibits bribes of any form including as a minimum, kickback payments and facilitation payments.
- the policy commits the Supplier to not using gifts or donations, politically or otherwise, to influence a stakeholder or business partner.

Diversity and Inclusion

CPE warrants that

- it will recruit people on the basis of the qualifications and abilities needed to do the job, while promoting diversity and development throughout our business.
- it will not operate any form of discrimination, harassment or bullying in the workplace

Local impact

CPE warrants that

- it has a policy to outline how it manages its social and economic impact on local stakeholders and communities.
- such policy outlines:-
 - when the Supplier will conduct impact assessments,
 - who the company will allow to participate in impact assessments, and
 - where and when the impact assessments will be made available.

Dealing openly and fairly

CPE warrants that it will be open, transparent and fair in its communications and dealings with its own business partners and other stakeholders affected by its supply chain activities and will take reasonable steps to ensure that it fulfils the payment terms and other conditions agreed with its business partners.

Responding to feedback

CPE confirms that it will be responsive to any concerns raised about its own supply chain raised by stakeholders or by our business partners through the Company's procurement and supplier management process.

This statement is made pursuant to section 54(1) of the Modern Slavery Act. It has been approved by the Continental Product Engineering Board of Directors and signed on its behalf by:



Nick Hollyoak

Director

Continental

(Last review date Jan 2021)