

Supplier Code of Conduct Policy

Aughton Automation is committed to the highest standards of social and environmental responsibility and ethical conduct. All Aughton Automation suppliers are required to provide safe working conditions, treat workers with dignity and respect, and act fairly and ethically and in full compliance with applicable legislation and regulations.

Health Safety and Wellbeing

We encourage you to provide a safe and hygienic working environment. Appropriate steps shall be taken to prevent accidents and injury to health through control of hazards in the workplace. You should ensure wellbeing is being practised in the workplace and a focus on both mental and physical health should be encouraged in order to identify stress and fatigue in your workforce.

Human Rights and Slavery

Aughton Automation expects all suppliers within its supply chain to share the commitment in protecting and promoting human rights. As a minimum we expect our suppliers to adhere to the following:

- No use of child labour
- No excessive working hours
- No discrimination
- No harsh or inhumane treatment
- Employment is freely chosen
- Safe and Hygienic working conditions
- Right of collective bargaining
- Compliance with requirements of the Modern Slavery Act 2015
- Human rights / slavery risks are assessed, managed and mitigated
- A full understanding of your own supply chain

The Real Living Wage

Employees' employment conditions should be clearly communicated to them. Employees should be fairly and reasonably paid in line with applicable wage laws relating to minimum wages, overtime hours and legally mandated benefits. Workers should be paid in a timely manner documented via pay slips or similar. We expect full commitment from our suppliers uphold the same standard of employment we offer and promote the values as per the [Living Wage Foundation](#)

Community

As a company we recognise the impact our daily operations may have on the local community and have therefore taken steps to mitigate our impact. We expect our suppliers to also share this commitment in supporting the following approaches:

- Building positive relationships with communities
- Understanding impacts your activities may have on your community
- Positive contributions / investments such as local employment, workforce volunteering
- Workforce development such as training programmes, apprenticeships

Diversity and Non-Discrimination

There shall be no discrimination in hiring and employment practices such as promotions, rewards or access to training. Employees should not be discriminated against on the basis of race, national origin, religion, age, gender, marital status, sexual orientation, union membership or political affiliation. We as a company are fully committed to equality and fully expect compliance with Equality Act 2010 from our suppliers. We also encourage suppliers to increase supplier participation and opportunities with smaller businesses and suppliers.

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AUGHTON AUTOMATION

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Environmental

We as a company pride ourselves on our Environmental commitments and expects all our suppliers to share our commitment in being a responsible business. As a minimum we expect our supplier to:

- Comply with all applicable Environment Statutory legislation
- Adopt best practices as set out and as aligned within ISO 14001
- Adopt Environmental considerations within your daily activities / routine operations
- Monitor Environmental Aspects and Impacts of your business
- Promote Environmental commitment within your supply chain
- Assess any Environmental risks, manage and mitigate them
- Align your procurement program with standards such as ISO 20400

Conflict Materials

Aughton Automation is committed to ethical practices and seek to keep our supply chain and products free from conflict minerals. We expect suppliers to have due diligence processes in place to identify and verify the source of conflict minerals contained in their products. We look to suppliers to advise the conflict mineral status of products and welcome dialogue from customers on areas of their conflict minerals compliance that we may be able to support **CFSI (Counterfeit, Fraudulent and Suspect Items)**

Aughton Automation recognises that there may be risks concerning the supply of Counterfeit, Fraudulent and Suspect Items (CFSI) which are subsequently incorporated into products / materials.

To mitigate this risk Aughton Automation purchases products only through approved suppliers, thereby ensuring that any product / material(s) are new, authentic, and fully warrantable under the direct supplier and that accurate up-to-date technical information is readily available. Other mitigating facts are as follows:

- Where ever possible, we purchase direct from manufacturers or suppliers who have been evaluated and approved under our Quality System. Where this is not possible, we only use suppliers that are able to demonstrate the quality and source of the goods they supply to this company
- All materials and components are purchased to agreed specifications.
- Incoming product is accompanied by certification if requested, which is checked against the original Purchase Order and other product information
- Incoming product is inspected for suspect items and validated against purchasing specification in-line with a documented process
- Any non-conformance is raised with the supplier and material rejected and returned if necessary

Should the organisation suspect any counterfeit product / materials then the organisation will ensure that such products / materials are immediately withdrawn and securely quarantined. Where needed, we will also work with suppliers to implement a product recall. Aughton Automation will report all occurrences of counterfeit products / materials, as appropriate to manufactures, customers and to appropriate authorities

Data Protection

We expect all our suppliers to full comply with the Data Protection Act 2018 when dealing with personal and sensitive data.

Ethics, Fraud, Bribery and Corruption

Aughton Automation has a Zero tolerance approach to any type of bribery, fraud or corrupt business practises. We as a company adhere to the 6 principles of the Bribery Act 2010 and expects all supplier to comply with the same. We also require the following provisions to be in place:

- Have a programme in place to prevent bribery, fraud, or corrupt business practises
- Reporting channels so employees can raise concerns
- Processes in place to protect employees who raise concerns
- Policies and procedures in place in accordance with applicable legislation / regulations

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Entertainment, Hospitality, Gifts and Cash Rewards

We do not expect any of our employees to take part in any activity that would affect their judgment when dealing with suppliers and we therefore expect the same from our suppliers and their employees. Our employees do not accept cash or cash equivalents such as gift certificates. Members of our procurement team also do not accept nor are allowed to give any business rewards to suppliers such as gifts, meals, hospitality and entertainment. Only gifts of small intrinsic value for example pens, or desk diaries; may be accepted from actual or potential suppliers.

Social Media

Any posts that involve Aughton Automation are not to be posted before prior approval from senior management. You are not to share, discuss or create any social media posts using the company logo, drawings or any other Aughton Automation intellectual property without prior approval.

Tax Compliance

Aughton Automation expects its suppliers to ensure that they remain fully compliant with changes to tax law, and we will not work with any suppliers who engage in any practises which may constitute tax evasion or involve workers not being taxed correctly.

Prompt Payment Code

We encourage our suppliers to adopt the principles of the Prompt Payment Code the same as we do.

Conflicts of Interest

When dealing with suppliers, potential conflicts of interest can sometimes arise. Any potential conflicts should be reported to your manager as soon as they are identified. Conflicts could include (but not limited to) spouses, relatives or former employees.

Following its initial adoption, this Policy will be reviewed by the Company's Board of Directors at the scheduled Management Meeting and may be amended from time to time.



Brian Duffy
CEO
Aughton Automation

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