



Supplier Code of Conduct

Date: [2025-09-10]

1.0 Introduction

Cespira is a leading manufacturer of components for heavy transport. We are committed to conducting business responsibly, ethically, and sustainably. This commitment extends to our entire value chain, including our suppliers.

This Supplier Code of Conduct ("the Code") outlines our fundamental expectations for all suppliers, their subsidiaries, and sub-contractors ("Suppliers"). We expect our Suppliers to not only comply with all applicable laws and regulations but also to embrace the principles set forth in this Code. Adherence to this Code is a critical factor in our supplier selection, retention, and development processes.

We expect our Suppliers to communicate the principles of this Code to their own employees and sub-suppliers.

2.0 Core Principles

2.1 Legal and Regulatory Compliance

Suppliers must comply with all applicable laws, regulations, and industry standards in the countries where they operate. This includes, but is not limited to, laws governing employment, health and safety, environmental protection, anti-corruption, and fair competition.

2.2 Business Ethics and Integrity

- **Anti-Corruption & Bribery:** Suppliers must prohibit any form of corruption, extortion, embezzlement, or bribery. This includes offering or accepting gifts, favors, or payments to influence business decisions improperly.
- **Conflicts of Interest:** Suppliers must avoid situations where personal interests could conflict, or appear to conflict, with the interests of Cespira.
- **Fair Competition:** Suppliers must comply with all applicable antitrust and fair competition laws.

- Confidentiality & Intellectual Property: Suppliers must protect the confidential information and intellectual property of Cespira and use it solely for the purposes authorized by contract.
- Accuracy of Records: All business records must be accurate, transparent, and maintained in accordance with applicable legal and accounting standards.

2.3 Human Rights and Labor Practices

- Freely Chosen Employment: All work must be voluntary. Forced, bonded, indentured, or involuntary prison labor is strictly prohibited.
- Child Labor Prevention: The use of child labor is prohibited. Suppliers must adhere to the minimum age requirements defined by local law and the ILO.
- Working Hours: Working hours must comply with applicable laws. Overtime must be voluntary, compensated appropriately, and not excessive.
- Wages and Benefits: Compensation paid to employees must meet, at a minimum, the legal minimum wage and provide all legally mandated benefits.
- Humane Treatment & Non-Discrimination: Suppliers must provide a workplace free of harassment, harsh treatment, and discrimination based on race, color, age, gender, sexual orientation, ethnicity, disability, religion, or other protected status.
- Freedom of Association: Suppliers must respect the right of employees to associate freely, join trade unions, and bargain collectively, where permitted by law.

2.4 Health and Safety

Suppliers must provide a safe and healthy working environment to prevent accidents, injuries, and occupational illnesses. This includes:

- Implementing robust health and safety management systems (e.g., based on OHSAS 18001 / ISO 45001).
- Providing necessary training, personal protective equipment (PPE), and engineering controls.
- Ensuring safe facilities, machinery, and processes.
- Establishing protocols for emergency preparedness, including emergency response, injury reporting, and investigation.

2.5 Environmental Protection

Suppliers must operate in an environmentally responsible manner and strive to minimize the environmental impact of their operations. Key expectations include:

- Environmental Management: Obtaining and maintaining all required environmental permits and complying with their provisions.
- Pollution Prevention & Resource Reduction: Implementing measures to reduce energy and water consumption, minimize waste, and promote recycling.
- Hazardous Substances: Safely handling, moving, storing, recycling, and disposing of hazardous chemicals and waste materials.
- Air Emissions & Wastewater: Controlling and monitoring air emissions and wastewater discharge.

2.6 Quality Management

Suppliers must have a certified and effective Quality Management System (e.g., IATF 16949) to ensure the consistent delivery of products and services that meet all agreed-upon specifications, performance, and reliability requirements for the heavy-duty vehicle industry.

2.7 Material Sourcing & Conflict Minerals

Suppliers must exercise due diligence to ensure that the materials incorporated into their products, particularly Tin, Tantalum, Tungsten, and Gold (3TG), do not directly or indirectly finance armed conflict or human rights abuses in the Democratic Republic of Congo or adjoining countries. Suppliers must comply with all relevant regulations (e.g., Dodd-Frank Act, EU Conflict Minerals Regulation).

2.8 Data Security and Privacy

Suppliers must implement appropriate technical and organizational measures to protect any data shared by Cespira (including personal data) from unauthorized access, disclosure, alteration, or destruction, in accordance with applicable data privacy laws (e.g., GDPR).

3.0 Supply Chain Responsibility

Suppliers are expected to apply the principles of this Code to their own supply chain and sub-contractors. Cespira holds our direct Suppliers responsible for the compliance of their sub-tier suppliers.

4.0 Monitoring and Compliance

- **Right to Assess:** Cespira reserves the right to monitor compliance with this Code through self-assessment questionnaires, on-site audits, and inspections conducted by our representatives or designated third parties.
- **Nonconformance:** Suppliers are required to promptly disclose any violations of this Code. Failure to comply may result in corrective action plans, suspension of business, or termination of the business relationship.
- **Continuous Improvement:** Suppliers are expected to commit to continuous improvement in all areas covered by this Code.

5.0 Reporting Violations

Suppliers must establish a mechanism for their employees to report concerns or violations of this Code anonymously and without fear of retaliation. Concerns can also be reported directly to Cespira at: <https://cespira.ethicspoint.com>.

6.0 Acknowledgment

By engaging in business with Cespira, the Supplier acknowledges that it has read, understands, and agrees to comply with the standards set forth in this Supplier Code of Conduct.