

# SERVOMEX

## SUPPLIER CODE OF CONDUCT

EXPECTATIONS

PRINCIPLES

VALUES



SERVOMEX.COM

**SERVOMEX**   
a spectris company

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## Welcome

Servomex has been a provider of gas analysis solutions for over 70 years, providing gas measurements to support quality, safety, process control and emissions, from percentage levels down to ultra-low parts-per-trillion.

Our extensive range of core technologies enables Servomex to serve key industrial and medical markets in over 150 plus complex and demanding applications.

As valued suppliers to Servomex, we acknowledge the key part you play in creating a more socially, economically and environmentally responsible supply chain.

Our Code of Conduct details the expectations and principles, all underpinned by our core Values that we expect to be extended and adopted within your own business organisation.

Servomex expect all our suppliers to conduct business in line with the values and aspirations as detailed in this Code, to comply with all relevant laws and regulations and to act in accordance with the highest ethical standards.

## Servomex Values

Our purpose is to make the world cleaner, healthier and more productive and our commitment is being a sustainable business partner and employer, built on our Values.



### Be True

We believe in absolute integrity. It's how we win for stakeholders, the environment and each other.

We do the right things in the right way.

–

We speak up when something isn't right.

–

We show care and respect for each other.



### Own It

We believe in teamwork and keeping our promises. It's how we build our brands and businesses.

We are decisive and take responsibility.

–

We prize diversity and play to everybody's strengths.

–

We put customers at the heart of our business.



### Aim High

We believe in being bold and positive. It's how we perform at our best and achieve greater success.

We continuously strive to improve.

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We keep an open mind and try new things.

–

We help each other succeed.

## Supplier Code Requirements

### a. Labour Conditions and Human Rights

Servomex require all businesses in our supply chain to share our commitment to respecting, protecting and promoting human rights. This includes alignment to the United Nations Guiding Principles on Business and Human Rights and complying with internationally recognised human rights standards. In the UK, you must comply with the Modern Slavery Act 2015. We encourage you to conduct anti-slavery awareness training with all your staff.

### b. Child Labour

Servomex do not tolerate the use of employees or forced use of employees under school-leaving age of the country of employment.

We expect our suppliers not to employ employees under the school-leaving age of the country of employment (other than in genuine apprenticeships) nor to expose young vulnerable groups to work that is mentally, physically, socially or morally dangerous.

### c. Forced Labour and Human Trafficking

Servomex do not tolerate the use of forced or illegal immigrant labour (including human trafficking and slavery).

We expect our suppliers to ensure appropriate procedures are taken where practicable to ensure adherence to this Code.

### d. Freedom of Association and Collective Bargaining

Servomex respect the rights of employees and adhere to applicable laws regarding the freedom of employees to associate or bargain collectively without fear of discrimination.

We expect our suppliers to ensure their employees are free to associate or bargain collectively without fear of discrimination, retaliation, harassment or intimidation.

### e. Diversity, Equity, Inclusion and Belonging

Servomex are committed to providing diversity, equity and inclusion among our workforce, eliminating unlawful discrimination and creating a culture where all employees feel that they belong. We understand the value of an inclusive supply chain that is richly diverse with ethnic, minority, women, LGBTQ, disabled, veteran and other diverse businesses reflective of all global communities. Taking steps to provide for a diverse and inclusive supply chain will enable us to support the communities that we serve, acknowledging and helping to address the economic and social uncertainties that we all face in these challenging times. We encourage you to consider supplier diversity, equity, inclusion and belonging in all your procurement activities.

Servomex expect that our suppliers adhere to all legislation relating to employment rights and equal opportunities, with particular reference to non-discrimination on the basis of race, colour, religion, national origin, gender, sexual orientation, age, disability or background.

Servomex also expect that our suppliers ensure that disabled persons are recruited, trained and promoted on the basis of aptitude and ability. If employees become disabled, every effort is made to retain them and, when necessary, to re-train them for appropriate roles.

**f. Harassment**

We expect our suppliers to ensure that physical, verbal and psychological abuse or threats towards their employees is not tolerated.

In addition, sexual or other forms of harassment towards supplier employees should not be tolerated.

**g. Working Hours, Wages and Benefits**

It is Servomex policy to pay wages and benefits which meet or exceed national minimum requirements and to adhere to working time regulations where applicable; we expect our suppliers to ensure that this Code is adhered to.

**h. Health and Safety**

In line with our Values, maintaining the health and safety of our employees, contractors and members of the public is paramount. Servomex are committed to the highest standards of health and safety and the maintenance of a positive safety culture. We comply with all relevant laws and regulations governing safe working and often go beyond legal requirements.

We believe everyone we contract with, collectively and individually, has a part to play in ensuring a safe working environment.

We acknowledge that operations give rise to risk but we believe, through senior management commitment, adoption of ISO45001 management standards, compliance with legislation and where applicable industry best practice, we can eliminate or minimise risk to a safe and acceptable level.

We expect the same level of commitment from our suppliers to provide and promote working conditions which meet Servomex's standards on health, safety and hygiene practices.

**i. Wellbeing**

Servomex cares about the health and wellbeing of all our employees, contractors and supply chain. Fostering a mental health culture enables an efficient and positive working culture.

We ensure measures are in place to prevent and manage risks to employee wellbeing, supported through appropriate training, individual support and running initiatives to raise awareness of wellbeing and mental health issues at work. We expect you to take the same approach to ensure wellbeing is a priority for your workforce.

**j. Ethics, Fraud, Bribery and Corruption**

Our Values of Be True, Own It and Aim High represent the qualities and actions we want to see at Servomex and support our commitment to conduct business in a fair, honest and open way and we expect you to be honest and fair as you conduct your business. We have a zero-tolerance approach to any type of bribery, fraud or corrupt business practices. We never offer, request or accept any gifts, hospitality or entertainment that could be perceived as a bribe, this includes inappropriate charitable donations and sponsorships. Our business maintains a register for recording gifts, hospitality and entertainment which must always be used. We do not make facilitation payments nor permit others to make them on our behalf. We recognise even small facilitation payments as a form of bribery.

We expect you to have established controls to prevent these activities and procedures in place in accordance with all applicable local, state, federal and national laws or regulations including, without limitation, the UK Bribery Act 2010 and UK Finance Act 2017 (Criminal Facilitation of Tax Evasion).

We will only engage with business suppliers of known integrity, who pass through our due diligence controls. To work with us you must co-operate with us in our due diligence process and respect and act consistently with our Values.

We expect you to conduct your business with fair and vigorous competition and in compliance with all competition/antitrust laws. You must also employ fair business practices, including accurate and truthful advertising.

#### **k. Confidentiality and Personal Data**

We take care of commercially sensitive information which you may provide to us and which we will only use as appropriate for legitimate business purposes and share with those colleagues who need to know to support our business. “Commercially sensitive information” includes, without limitation, customer information, legal documents, contracts, proposals, information about a specific customer or employee, intellectual property and trade secrets.

We expect you to respect the confidentiality of any commercially sensitive information we may provide to you and to maintain appropriate processes for the safeguarding of such information to prevent its unauthorised disclosure to or use by any third party.

Servomex are committed to the protection and security of the personal data of our staff, suppliers and customers in line with EU data protection law, including but not limited to the General Data Protection Regulation and equivalent laws in other jurisdictions where we operate (“Data Protection Laws”).

We expect our suppliers who collect, record, organize, store, access, adapt, alter, retrieve, use, disclose and otherwise process Personal Data on behalf of Servomex to support this commitment and, in particular, to observe their obligations under the Data Protection Laws.

#### **l. Environment**

Servomex are committed to an ambitious Net Zero commitment which has been validated by the Science Based Targets initiative against a 1.5°C warming scenario, which includes Net Zero by 2030 (Scope 1 and 2 emissions) and, for our value chain, Net Zero by 2040 (Scope 3 emissions).

We recognise the value of the global natural environment and ensure sustainability is included in our investment, procurement and operational decision making.

For our supply chain we have partnered with EcoVadis to drive our transition to a low carbon economy and will be further developing this partnership by engaging with our suppliers to support our Net Zero ambitions.

We expect all our suppliers to support us in this approach and actively work towards making a positive impact on environmental factors linked to our operations. We are all responsible for protecting the global environment.

As a minimum we require you to:

- Comply with all legal requirements and obligations and align your management systems to standards such as ISO14001;
- act to prevent pollution which may result from your activities;
- protect biodiversity by limiting the impact your activities may have on natural habitats;
- implement mitigation and adaptation methods to limit your impact on climate change; and
- implement an environmental strategy and establish relevant metrics and targets to assess progress. Include but not limited to:

- reduction of GHG emissions and supporting us on our journey to net zero;
- by identifying your key waste streams, track how much waste you produce aiming for zero waste sent to landfill;
- tracking your energy usage and where feasible switching to renewable energy sources and increasing energy efficiencies;
- optimising resource consumption by adopting a programme of reduction, reusing, recycling, recovery, redesigning, remanufacturing in all your processes; and
- working with local communities to enhance the natural environment.

### **m. Sourcing and Materials**

We expect all our suppliers to safeguard and make sure that the use and importation of minerals and metals come from responsible sources only. In particular, we expect you to ensure that no human rights violations occur and to ensure that no compulsory, child or forced labour is used to mine or process minerals or metals. Special consideration will apply to what are known as ‘conflict minerals’, i.e. ores and concentrates containing tin, tantalum, tungsten or gold.

Our policy is not to use products containing *conflict minerals*. We expect you, as a business in our supply chain, to have policy and controls in place to monitor and prevent the use of minerals sourced illegally or unethically.

We expect all our suppliers to understand their obligations under the UK and EU REACH regulations and, in addition, seek out and specify materials and products that minimise exposure of Substances of Very High Concern to people and the environment. Ideally, suppliers should provide full material disclosures to facilitate Servomex compliance with chemical legislation worldwide.

## **Governance and Management Systems**

We expect our suppliers:

- to provide goods and services of excellent quality and high reliability and ensure on-time delivery;
- to demonstrate commitment to the content described in this Code by allocating the appropriate resources;
- to identify and comply with applicable laws, regulations, standards and relevant customer requirements;
- to have mechanisms to determine and manage risks in all areas addressed by this Code and to review them on a regular basis or ad hoc if the risk situation has significantly changed;
- to maintain documentation necessary to demonstrate conformance with these expectations and compliance with applicable regulations;
- to have training programmes that enable the appropriate knowledge, skills and abilities in management and for employees to address the requirements of this Code;
- to have systems allowing them to carry out due diligence on their own supply chain. Suppliers shall provide supply chain transparency to Servomex, if required, regarding human rights risks and conflict minerals and metals; and
- to continually improve by setting performance objectives, executing implementation plans and taking necessary corrective actions for deficiencies identified by internal or external assessments, inspections and management reviews.

## Grievance

We expect our suppliers to have a fully transparent grievance procedure.

If a supplier or their employees believe that anyone in their company or in Servomex's supply chain has acted contrary to the principles of this Supplier Code of Conduct, they are encouraged to report the concerns to the Spectris Helpline at [www.spectrishelpline.com](http://www.spectrishelpline.com) or email to [speakup@spectris.com](mailto:speakup@spectris.com). Suppliers shall establish their own complaints procedure and encourage their employees to report concerns or information regarding non-compliance, especially on actual or potential illegal activities in the workplace or adverse human rights impacts or environmental impacts resulting from supplier's own operations, without threat of retaliation, reprisal, intimidation or harassment. Suppliers shall investigate and take corrective action if needed.





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