

OVERVIEW

SPAREX Limited and its Employees are held to the highest standards of Professionalism, Ethical Behaviour and Adherence to the Law. These same standards are expected of the SPAREX supply base. This Supplier Code of Conduct is intended to establish a foundation for the crucial relationships SPAREX forges with its supply base. SPAREX requires strict adherence to the following elements by its entire supply base, tier supply base and any company seeking to do business with SPAREX.

SPAREX has made a firm commitment to these standards and expects all its Suppliers and sub-suppliers to adopt and take aggressive measures to achieve the same level of conduct committed to by SPAREX. With a joint level of participation, SPAREX and our supply base can go further, together.

WORKPLACE AND HUMAN RIGHTS

Child Labour

- SPAREX Suppliers and its sub-suppliers are fully expected to comply with all local laws applicable to the minimum age of employees.
- The minimum age of all workers must meet or exceed local laws for an employment age and must comply with International Labour Organisation regulations.
- In no case shall any employee be under the age of 14.

Forced Labour

- SPAREX suppliers and its sub-suppliers will not in any case utilise any form of involuntary or forced labour, inclusive of prison, bonded or indentured labour.

Harassment

- SPAREX suppliers and their sub-suppliers will offer a workplace that respects the dignity and human rights of all employees. In no event shall employees be subject to physical, sexual or verbal harassment.
- Further no employee shall be held to corporal punishment or use of monetary penalties as an act of punishment.
- All SPAREX suppliers and their sub-suppliers shall treat its employees with respect and courtesy and shall not discriminate or harass other employees based on race, religion, colour, nationality, gender, age, disability, military status, sexual orientation or any other statute protected by law.

Hours of Work

- SPAREX Suppliers and its sub-suppliers will ensure that its employees working hours per week, inclusive of overtime, comply with local laws governing regular work hours and overtime work hours.

Wage and Benefits

- SPAREX Suppliers and its sub-suppliers are expected to pay their employees the minimum compensation required by local laws inclusive of regular wages, over-time pay and benefits that are legally mandated.

Health and Safety

- SPAREX Suppliers and its sub-suppliers will ensure that their employees have a safe and healthy work environment. It is expected that employees are afforded the opportunity to work in a safe environment with safety preventative procedures and equipment that meet all local laws and regulations.

Environment

- SPAREX strongly believes the environment is paramount to its customers and all its employees. SPAREX gives the utmost respect for the environment and expects its Suppliers and its sub-suppliers to conduct their operations in the highest of environmental standards while at minimum complying with local and regional laws regulating environmental controls. Moreover changes or trends in each local law should be anticipated and considered.

ETHICAL STANDARDS

Gifts, Favours, and Improper Payments

- It is SPAREX's policy to conduct its business affairs fairly and impartially in an ethical and proper manner. Business decisions made by employees of SPAREX should be made on the basis of quality, service, price and similar competitive factors.
- Employees of SPAREX must avoid any decisions that are, or give the appearance that any decisions are or were influenced by business courtesies. A business courtesy is a gift or favour for which fair market value is not paid by the recipient. It might be a tangible or intangible benefit and would include, but is not limited to, such items as meals, drinks, entertainment, all forms of hospitality, recreation, transportation, discounts, tickets, passes, promotional material and the recipient's use of the donor's time, material or equipment.
- Social amenities customarily associated with legitimate business relationships are permissible. These include the usual forms of entertainment such as lunches or dinners as well as occasional gifts of modest value. While it is difficult to define "customary," "usual" or "modest" by stating a specific amount, common sense should dictate what would be considered extravagant or excessive. Employees will not accept anything that would influence or is intended to influence their exercise of their independent judgment in pursuit of the best interests of SPAREX. If a disinterested third party would be likely to infer that it affected our judgment, then it is too much. All of our business dealings must be on arms-length terms and free of any favourable treatment resulting from the personal interest of our employees.

Bribery and Integrity

- SPAREX Suppliers and its sub-suppliers will not engage in any corruption, kickbacks, bribery to government or ranking officials in connection to business related to supplying of SPAREX product or services. All US Foreign Corrupt Practices Act and local laws must be abided as a condition of supplying SPAREX.
- SPAREX Suppliers and its sub-suppliers shall comply with all applicable laws governing competitive practices, such as antitrust and price control laws.

LEGAL COMPLIANCE

Compliance & Confidentiality

- SPAREX Suppliers and its sub-suppliers will comply with the law of each country and region inclusive of compliance with competition and export laws in each country or region.
- All SPAREX Suppliers and its sub-suppliers shall respect SPAREX's proprietary information, obtained by the employee in the performance of his/her work, preventing misuse, informal discussion or disclosing of such information to unauthorised persons and refrain from, with knowledge, making false or improper records of any document.

Monitoring and Record Keeping

- SPAREX Suppliers and its sub-suppliers in accordance with complying with all of SPAREX's Supplier Code of Conduct will maintain the necessary documentation to support its compliance and will allow SPAREX the right of inspection and/or review of the respective documentation for assurance of the SPAREX Supplier Code of Conduct.
- SPAREX reserves the right to audit either announced or unannounced of any Suppliers facility and the Supplier must make available the necessary Supplier representative to effectively supply the compliance documentation.

REPORTING MISCONDUCT

In the event a Supplier, sub-supplier, prospective supplier or any other persons or group believe that any of the listed elements of the SPAREX Code of Conduct have been violated or breached, this person/persons may report such activity with strict confidentiality anonymously.

To report any violations:

BY PHONE: **+1 866 680 3083**

ONLINE: **<https://agcocorp.alertline.com>**

BY POST: **Global Legal & Compliance
4205 River Green Parkway
Duluth, GA 30096-2568**