



Gantry Railing Ltd Global Vendor Code of Conduct

1 Document Owner and Version History

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Version history :

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0.1	29/04/2021	Stephen BATEMAN	First draft

2 Overview

The Gantry Railing Ltd Global Vendor Code of Conduct (GVCC) applies globally to the engagement and execution of activities with all vendors. For purposes of this GVCC, a vendor is defined as an external third-party that the Company has entered into a business or contractual relationship to provide business goods, services, functions or activities.

3 Scope & Applicability

Gantry Railing Ltd is committed to conducting business in a legal, ethical and responsible manner and requires that our approved vendors work at the same high level of standards. The Gantry Railing Ltd GVCC sets out the principles, guidelines and expectations we have of our vendors in conducting business responsibly and with integrity. In addition, Gantry Railing Ltd vendors are expected to fully comply with the laws and regulations of the countries in which they operate.

Gantry Railing Ltd requires all vendors to comply with the GVCC. Where the GVCC may conflict with the terms of a vendor contract, the contract terms will prevail. Further information regarding monitoring and compliance is found later in this document. Vendors are expected to enforce the GVCC with their employees and any sub-contractors.

Vendors should contact the Gantry Railing Ltd Operations Manager in charge of their scope of supply with any questions or concerns related to the GVCC. Gantry Railing Ltd values the contribution its vendors make to the success of the company and building mutually beneficial client-vendor relationships.

4 Compliance with the GVCC

All Vendors and their employees must adhere to this GVCC while conducting business with, or on behalf of, Gantry Railing Ltd. Vendors must promptly inform the Gantry Railing Ltd Operations Manager in charge of their scope of supply when any situation or circumstance develops that causes, or reasonably might expect to cause, the vendor, or a vendor employee, to be in violation of this Code. Gantry Railing Ltd vendors are expected to self-monitor their compliance with this GVCC. Gantry Railing Ltd may audit vendors or their facilities at any time (in accordance with the vendor contract), to confirm compliance with this GVCC. Terms for GVCC non-compliance will generally be covered within individual contractual agreements. Penalties for non-compliance may include, but not be limited to:

- Immediate removal from Gantry Railing Ltd account;
- Vendor account sanctions - These may include barring engaging on new tenders for periods up-to 90 days; repeated account sanctions may lead to vendor dismissal from Gantry Railing Ltd; permanent embargo from doing business with Gantry Railing Ltd.

At any time, Gantry Railing Ltd may require the vendor to participate in training on this GVCC.

4.1 Business Ethics

4.1.1 Ethical dealings

- Vendors will operate with integrity, in an ethical manner and in compliance with all applicable laws, rules and regulations applicable to their industry and place of business. Vendors will not engage in bribery, corruption, embezzlement, extortion, kickbacks, excessive commission, inducements or fees and any other prohibited business practices.
- Vendors are expected to:
 - Comply with all relevant laws and regulations in all locations in which they operate;
 - Comply with antitrust laws and fair competition laws that govern the jurisdiction in which they conduct business;
 - Comply with applicable privacy and data laws, including data exportation/importation laws and regulations;
 - Comply with applicable trade laws, as well as applicable export/import laws and regulations;
 - Not use Gantry Railing Ltd trademarks, intellectual property or confidential information without prior authorization from Gantry Railing Ltd;
 - Not represent themselves as employees of Gantry Railing Ltd unless authorized by Gantry Railing Ltd;
 - Not disclose its relationship with Gantry Railing Ltd without prior authorization from Gantry Railing Ltd, excluding cases where required by law, regulation or to comply with an active law enforcement investigation;
 - Not utilize social media in any way where the activity may adversely impact Gantry Railing Ltd reputation, analytic impartiality or create an actual or potential conflict of interest, or any appearance of a conflict, with Gantry Railing Ltd.

4.1.2 Data Security & Confidentiality

- Vendors will handle and process data only for the purposes for which it was collected or otherwise made available. Vendors shall demonstrate appropriate industry standard and best practices data

security controls to ensure that all information is protected and secure from damage and unauthorized use.

- In addition to the above minimum requirements, vendors shall follow any data security requirements specified in contractual agreements with Gantry Railing Ltd.
- Vendors must respect and maintain the confidentiality of all non-public information about Gantry Railing Ltd or its activities and all non-public information obtained in the performance of the employee's duties about Gantry Railing Ltd customers, clients or applicable third parties.
- Vendors will immediately notify Gantry Railing Ltd of any known or suspected data security breaches and will work with Gantry Railing Ltd and, if applicable, law enforcement to contain the breach and determine a root cause.

4.2 Labour standards

Gantry Railing Ltd is committed to developing an organizational culture which implements a policy of support for internationally recognized human rights and labour standards. We support the principles contained within the United Nations Declaration of Human Rights and the International Labour Organization's (ILO) Core Conventions on Labour Standards.

4.2.1 Child labour

- Vendors will not use child labour. The minimum age for employment will be the greater of (i) the minimum age under local law, (ii) the minimum age pursuant to the Convention Concerning Minimum Age to Employment adopted by the International Labour Organization or (iii) 15.
- Workers below the age of 18 should not be involved in activities likely to jeopardize their health, safety or morals or interfere with their compulsory education.
- Vendors may be required to disclose any workers under the age of 18 and detail the specifics of their job functions, including what, if any, support they may be providing to Gantry Railing Ltd.

4.2.2 Involuntary Labour

- Vendors will not use any forced, compulsory or involuntary labour, whether bonded, indentured, or imprisoned.
- Employees shall be able to terminate their employment within reasonable notice.

4.2.3 Non-Discrimination

- Vendors will not discriminate on the basis of race, religion, age, nationality, social or ethnic origin, disability, sexual orientation, gender, gender identity, marital status, veteran status or political affiliation, in its hiring or employment practices; such as, compensation and benefits, access to training, promotion, termination and retirement.

4.2.4 Wages, Benefits & Working Hours

- Vendors will comply with applicable wage and working hour laws and regulations, including those relating to minimum wages, overtime, maximum hours and legally mandated benefits.
- Vendors will compensate their employees for hours worked in a globally known currency, such as the Euro, United States Dollar, Canadian Dollar, Chinese Yuan, British Pound, Indian Rupee, etc. Other forms of compensation such as stock, equity and employer sponsored unqualified plans are also acceptable.
- Vendors will disclose to Gantry Railing Ltd if it deducts workers' pay for employer provided services such as living quarters, apartment utilities, food, hygiene products or any other basic human services employees may require to live. This excludes standard employer provided healthcare and retirement plans.

4.2.5 Fair Treatment

- Vendors will treat employees with dignity and respect. Physical abuse, the threat of physical abuse, sexual or other harassment, verbal abuse or any other form of intimidation are prohibited.
- Vendors will not retaliate against employees who report abuse, discrimination, ethical concerns or violations of law.

4.3 Health & Safety

Gantry Railing Ltd is committed to developing an organizational culture which implements a policy of support for internationally recognized human rights and labour standards. We support the principles contained within the United Nations Declaration of Human Rights and the International Labour Organization's (ILO) Core Conventions on Labour Standards.

4.3.1 Work Environment

- Vendors will provide employees with a safe and healthy workplace in compliance with all applicable laws and regulations. Vendors will take adequate steps to prevent accidents and injury to health at work including providing workers with appropriate workplace health and safety information and training.

4.3.2 Sanitation, Fire & Water

- Vendors will provide clean toilet facilities, access to clean water, and adequate heat and ventilation.
- Vendors will ensure physical facilities where employees work from have sufficient fire prevention, alert and suppression systems, including having sufficient facility exit points for escape.

4.3.3 Emergency Preparedness & Response

- Vendors will identify and assess emergency situations and minimize their impact by having adequate emergency preparedness plans and response procedures to ensure their employees' health and safety.
- Vendor will maintain and provide an accurate copy of its disaster recovery plan and business continuity plan in connection with the Services that is in accordance with industry-standards. Where applicable, vendors will at a minimum test annually their fire, emergency, continuity, disaster recovery or other contingency plans.

4.4 Environmental Standards

4.4.1 Protection of the Environment

- Vendors will comply with all applicable environmental laws and regulations.
- Vendors are expected to operate in an environmentally responsible manner and strive, as far as practical, to manage and minimize negative environmental impact including use of energy, greenhouse gas emissions, water, biodiversity, waste, hazardous materials and other natural resources.

4.4.2 Environmental Management System

- Vendors will continually evaluate the need for an environmental management system detailing the process of managing their environmental impacts and implement as appropriate.

4.5 Raising Concerns

4.5.1 Expected of Gantry Railing Ltd

- Vendors will treat Gantry Railing Ltd – and expect to be treated by Gantry Railing Ltd - with respect and have open and honest communications.
- Gantry Railing Ltd will maintain a competitive and fair climate for our vendors.

4.5.2 Expected of Gantry Railing Ltd Vendors

- Vendors may contact Gantry Railing Ltd with any questions or concerns related to this GVCC.
- Gantry Railing Ltd will communicate the GVCC internally and externally to relevant parties. Vendors are responsible for communicating the provisions of this GVCC to their employees, suppliers and any sub-contractors.
- Where appropriate, relevant training and guidance will be given to employees of vendors to support implementation of this GVCC.

4.6 Compliance & Monitoring

Vendors confirm by the signature of a person authorized to agree to this GVCC that they have received, read, understood and will comply with this GVCC.

VENDOR ACKNOWLEDGEMENT

I certify that our company has received, read and understood and will abide by Gantry Railing Ltd Global Vendor Code of Conduct.

Company Name

Representative

Job Title

Date

Signature & Stamp

Questions?

In case of any questions, contact stephen.bateman@gantrail.com