

rotork[®]

Keeping the World Flowing
for Future Generations

Supplier Code
of Conduct



Revision Control

Revision Approval

Revision 3.0

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Document Control

Document Control Statement

This document is the property of Rotork PLC ("Rotork"). It applies to all companies within the Rotork corporate group (hereinafter referred to as "Rotork").

Document Classification, Storage, and Handling

This document is for external communication and classified as PUBLIC. This classification covers information that can be shared with anyone whether or not directly linked with Rotork. The policy is made available on the Rotork website.

Document Distribution and Maintenance

Global Supply Chain is responsible for the distribution and maintenance of this policy. Clear guidance on the latest version of this policy will be communicated via Rotork's website, with any obsolete versions of the policy, archived. Users must review the latest version on publication and adhere to any amendments.

Scope

This Supplier Code of Conduct applies to all third parties that provide goods or services to companies within the Rotork corporate group (hereinafter referred to as "Rotork"). This includes but is not limited to all suppliers, contractors, consultants, and brokers (collectively "Suppliers").

Introduction

Rotork seeks to maximise the benefits created in our global supply chain for Rotork, its shareholders, customers, those working in our supply chain, our communities and the environment. Rotork has earned a reputation for integrity, fair dealing, and ethical behaviour. We are determined to preserve that reputation and that, wherever we do business or operate around the world, we exert a positive influence and create value for our stakeholders.

Rotork has a Code of Conduct, published on our website [here](#) that sets out the standards of behaviour that Rotork expects from anyone acting on Rotork's behalf, including all permanent employees, temporary workers and contractors. We expect everyone to follow the Code and act with integrity at all times.

Our Supplier Code of Conduct sets out our core expectations in terms of ethical values and behaviours of our suppliers and our suppliers' own supply chains.

Supplier Code of Conduct

We expect all Suppliers to conduct their business with integrity, fairness and in good faith, and comply with the core behaviours and values set out in this Supplier Code of Conduct. Rotork also expects Suppliers to apply principles and standards at least as stringent as those in our Supplier Code of Conduct to their own supply chains.

The Supplier Code of Conduct describes our expectations on ethical behaviours and compliance with applicable laws including promoting equal opportunities, human rights, freedom of association, labour rights, good environmental practices, and our zero-tolerance approach to bribery and corruption. It applies to all Suppliers globally and is published in eleven languages. Rotork also expects Suppliers to apply our Code to their own supply chains.

Rotork encourages Suppliers to work following social accountability standards such as SA8000 or ISO 26000 and to use definitions provided by these standards to define their programmes. In addition, we expect Suppliers to engage with Rotork openly and constructively on social, ethical and environmental issues and continuously improve in all areas.

Core Values

As a Supplier to Rotork, we expect you and anyone working on your behalf, to behave according to the core behaviours and values set out in our Code of Conduct and to avoid acting illegally or unethically.

These include:

- Complying with all applicable laws;
- Reducing health and safety risks associated with your business to a level as low as reasonably practicable and following safety standards at least as stringent as Rotork's to create a safe environment for everyone whilst working at Rotork, a customer site, or your own sites;
- Treating others with trust, dignity and respect and without discrimination on the basis of race, gender, nationality, religion, sexual orientation, gender identity or expression, veteran status, citizen status, genetic information, marital status, pregnancy or family status, disability, age or any other characteristic protected by the applicable law and operating a zero-tolerance policy to bullying or harassment;
- Supporting the protection and promotion of human rights in your own operations and supply chain and ensuring you are not complicit in any human rights abuses;
- Ensuring fair working conditions, including paying wages and benefits which meet or exceed national minimum requirements and adhering to working time regulations where applicable;
- Never using child, compulsory or forced labour or any other form of slavery or servitude and working diligently to ensure that your supply chain does not use such practices; including by terminating with immediate effect any of your suppliers who are found to have or are suspected of having such practices;
- Upholding freedom of association and the effective recognition of the right to collective bargaining, free from interference, discrimination, retaliation or harassment;
- Protecting Rotork and third-party confidential information and ensuring it is only shared when permitted and subject to appropriate controls;
- Implementing appropriate policies and procedures and policies in respect of cybersecurity and meeting any minimum security requirements or accreditation requirements set out in any supply contract;
- Collecting and processing any personal data, in whatever form, with care, and in compliance with applicable data privacy laws and deleting any data you hold when it is no longer required;
- Operating a zero-tolerance policy to extortion, bribery and corruption and never offering, paying, soliciting or accept bribes or kickbacks (including the offering or acceptance of facilitation payments), in any form, whether directly or through any third party and regardless of cultural differences;
- Refraining from offering gifts and hospitality to Rotork employees. Rotork has a Gifts and Hospitality policy that its employees are required to follow and which prohibits acceptance of any gifts and hospitality that are not proportionate and of modest value;
- Declare to Rotork any conflicts of interest that may affect your business with Rotork such as family, business or personal connection to a current Rotork employee, competitor or customer;
- Complying with all applicable laws and regulations related to fair competition and the protection of non-public information you may have access to in your dealings with Rotork or its competitors;
- Complying with all applicable sanctions, customs and international trade laws, and implementing robust supply chain security measures that protect goods, information, and processes from theft, tampering, or other disruptions along the entire supply chain;
- Providing clear, accurate and verifiable country of origin details for all products, in line with applicable customs, trade and labelling requirements on request;
- Comply with anti-money laundering legislation taking steps to identify and avoid involvement in or support of money laundering practices;
- Operating a zero-tolerance approach to the facilitation of tax evasion;

- Keeping accurate, timely and complete business records related to transactions between your business and Rotork, including any product inspection and testing documentation;
- Ensuring that any products and services you provide to Rotork are safe and meet high quality standards, by maintaining a Quality Management System (QMS) that meets the requirements of the latest version of ISO9001, covering all applicable product safety and quality standards, certifications, laws and regulations, and retaining documentary records as evidence of conformity;
- Ensuring that all products comply with applicable product safety, environmental and chemical regulations—including REACH, RoHS, PFAS, and any similar legislation—and providing proof of compliance when required;
- Achieving high standards of environmental management through efficient use of resources, robust pollution prevention measures and increased use of renewable energy, while complying with all applicable environmental laws, regulations and codes of practice at a minimum;
- Calculating and reporting greenhouse gas emissions associated with your business operations following the Greenhouse Gas Protocol (<https://ghgprotocol.org/>) and disclose these to Rotork, in public company reports and via platforms such as CDP (<https://www.cdp.net/>).
- Complying with Rotork's Conflict Minerals Policy (a copy of which is available on our website [here](#)), and not knowingly procuring minerals that finance conflict.

Additionally, we encourage you to establish clear governance structures with designated roles for sustainability to support compliance with sustainable practices, including procurement.

We also encourage enhanced transparency by regularly reporting on your practices and assisting Rotork in mapping our sub-tier supply chain to improve supply chain risk and resilience.

Audit

Rotork reserves the right to visit and inspect its Suppliers' premises in order to monitor compliance with this Supplier Code of Conduct and by acting as our supplier you consent to Rotork doing so. Suppliers are expected to cooperate by acting transparently and making their premises and personnel accessible to Rotork so that a meaningful audit can be conducted. In certain circumstances, Suppliers may be expected to conduct similar audits of their suppliers.

Reporting Concerns

Rotork has a culture of openness and accountability. We uphold the values and principles of the Code of Conduct and raise any issues or concerns, and we expect our Suppliers to do the same. You can raise an issue or concern by talking to your usual point of contact at Rotork or, if you feel uncomfortable doing this, our Speak Up Policy sets out the various ways you can raise a concern, including details of our Speak Up helpline, which is hosted by an independent third party and is available 24 hours a day, 7 days a week. The helpline allows you to report your concerns in your preferred language in a secure manner, and anonymously if you prefer.

Rotork has a zero-tolerance policy on retaliation. When you report possible misconduct, you are doing the right thing and will be protected from retaliation. Any concerns about retaliation should be reported to the Group General Counsel & Company Secretary, Chief Human Resources Officer or Head of Ethics & Compliance.

You can find a copy of Rotork's "Speak Up" policy on our website [here](#).

Principles Based Approach

Suppliers should act in accordance with the values and behaviours set out in this Supplier Code of Conduct when ethical and compliance issues arise. These Supplier Code of Conduct principles are fundamental to how Rotork does business. However, this Supplier Code of Conduct cannot anticipate every possible instance in which an ethical issue may arise. Instead, it aims to reinforce the ethical and responsible way in which Rotork expects you to conduct your business and the integrity, honesty and transparency which is required in your operations.

Guidance about how to make ethical decisions is provided at page 6 of our Code of Conduct.

Rotork will be entitled to require additional assurance in the form of an annual certificate of compliance with this Supplier Code of Conduct, which you shall provide if requested.

Rotork will be entitled to terminate any contract with a Supplier immediately if it reasonably believes the Supplier has failed to adhere to either the letter or spirit of this Supplier Code of Conduct.



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