

## CODE OF CONDUCT

### A SHARED CODE OF CONDUCT FOR SHARED BUSINESS SUCCESS

To all Castings plc Suppliers,


Since our beginning in 1835, Castings plc has evolved into one of the leading companies in our industry. Our goal has always been to create a business environment where we, as a company, fully trust our business partners and collaborate to deliver excellent results for our customers.

This Ethical Code of Conduct outlines how we expect you as a supplier should act to reach top results. It is designed to promote honest and ethical conduct with all your stakeholders: customers, suppliers and contractors, competitors, shareholders, government, regulatory authorities and the public.

Being a part of Castings plc supply chain means adhering to certain rules of behaviour. After all, our actions and work as individuals affect other people, and our common business. We expect you to take those aspects into account when making decisions. This Code is our guide and support in correct decision making. In so doing, you will protect the trust our stakeholders place in our company and uphold the high ethical principles that define Castings plc.

**Adam Vicary**

Chief Executive Officer

Signed: .....

Dated: .....01.05.2019.....

Castings plc, Lichfield Road, Brownhills, Walsall, West Midlands, WS8 6JZ, UK.

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## **AIMING FOR THE HIGHEST STANDARDS**

Following the letter of the law is important. It is, of course, fundamental to ethical work. Yet, we look beyond to the spirit of the law, to what's truly best, not only for ourselves, but for the world around us because we know that as a global company, we can't help but have an impact. That's why we aim to follow the highest standards - in everything we do, everything we say, everywhere we work, every day.

That is why we have built our Ethical Code of Conduct upon globally acknowledged principles for human rights, fair labour practices and environmental responsibility as set forth in the UN Declaration of Human Rights, UN Convention on the Rights of the Child, OECD Guidelines for Multinational Enterprises, UN Global Compact, applicable ILO conventions, as well as national legislation.

No Code can cover every possible situation; yet it should always be your foundation. Let these principles, along with knowledge, awareness, and integrity, guide you and when you are in doubt, always ask (see: Where to turn for help).

## **WHO IS THIS CODE FOR?**

The quick answer is everyone. To be more specific: every employee or representative of Castings plc and its subsidiaries, including the Board of Directors, must know and follow this Code. This also extends to our Contractors, suppliers, consultants and their employees, who must also strive to follow the highest standards.

By accepting and/or continuing in a position at Castings plc, whether full time, part time, temporary, or otherwise, you are obliged to follow this Ethical Code of Conduct. It is designed to safeguard you, your colleagues, our company and our customers, which is why we put such importance on everyone following it.

Castings plc will take decisive action if we find that the Code was not followed, including dismissal or contract termination. If severe and/or in violation of laws and regulations, noncompliance or misconduct may also lead to criminal charges.

### **Additional Responsibilities for Managers**

Those of you in leadership positions within Castings plc have the important responsibility of also leading others in ethical behaviour. This, of course, starts with you; showing the right behaviour is always more effective than telling.

Beyond being a good role model, it's important that you also:

- Ensure all your team members have read and understood our Code.
- Ensure all your team members are up-to-date on current laws and regulations that apply to their jobs.
- Develop a positive work environment for your team that encourages accountability in ethical behaviour.

- Promptly and professionally answer questions or concerns about matters related to our Code, as well as reports of misconduct.
- Support your team in making good decisions by never allowing retaliation for speaking up in matters of ethics and our Code.

## WHERE TO TURN FOR HELP

Just as we all share responsibility to follow our Code; we also share responsibility to hold each other accountable. Immediately report any breach or suspected potential breach of our Code or laws/regulations. Quick action could prevent a harmful situation, or prevent an already dangerous situation from becoming worse. If you are unsure, seek advice or support as soon as you can from your immediate manager. If he/she is unavailable or you are uncomfortable talking to your manager, you may contact any of the following for help:

- Your local Human Resource manager.
- Anyone in the Castings plc group management.
- Another Castings plc manager.

## PROMISES TO SUPPORT YOU

At Castings plc, having the courage to do the right thing should always be met with respect and support. Just as we expect our employees to take our Ethical Code of Conduct seriously, we promise to take your concerns and reports seriously, following up on each one in a timely and complete way, without bias.

Castings plc **does not tolerate retaliation against anyone attempting to follow our Code.**

Whether passively ignoring or actively preventing someone from raising a concern, including unfair treatment or even dismissal, retaliation has no place at Castings plc. If you suspect retaliation against you or anyone else at Castings plc - report it just as you would any other breach of our Code.

## **CUSTOMER FIRST: BUILDING TRUST WITH HIGH ETHICS**

*“Our business partners have the right to expect honesty and responsibility from us in all our business interactions. We cannot put our customers’ or our own long-term success at risk for short-term gains that are unfairly or unlawfully gotten. Truth and transparency must be our foundation”.*

## **STAYING CURRENT ON ALL LAWS & REGULATIONS**

Know the law and follow it.

Castings plc as a Company is, of course, required to follow all laws and regulations that apply to our business and that hinges on each of us as individuals knowing and following them.

Large, respected companies have collapsed because of the misdeeds or unethical actions of just one or a few individuals.

You are responsible for keeping yourself up-to date about the applicable laws, regulations and guidelines for your job and our business in general. Castings plc will assist you as much as possible in this with job training, updated policies and handbooks, presentations, etc. If you encounter a situation not addressed in this Ethical Code of Conduct or our other policies/procedures, or for which these differ from the law, always follow the law.

### **International Considerations**

As a global company, we must stay up-to-date on international laws and regional laws for those areas in which we operate. If laws or regulations in your region could affect our operations in another region, be sure to promptly contact your appropriate colleagues in that region, as well as Castings plc group management as appropriate.

### **Trade Embargoes**

Since our physical goods as well as our services, technologies, and other intellectual property often cross borders, it is vital that we comply with import/export and trade compliance laws. This includes international transport during all stages of production, not just final sales deliveries – for example, R&D and manufacturing. Everyone acting on behalf of Castings plc must be aware of the applicable laws governing embargoes, customs, trade sanctions, etc.

In addition, all employees must be familiar with basic best practices to ensure that we are compliant. Always crosscheck all products and equipment against export control and restriction lists - acquiring necessary export licenses and ensuring goods are not supplied within countries with stricter embargoes. Consistently check transactions and conduct regular audits. Include controls within our contracts detailing sanctions exclusions and warranties.

## **AVOIDING FRAUD**

Simply put, fraud involves deceiving others for unlawful gain. There is no need to explain how devastating it would be for our company and, by extension, for each of our own jobs, security and reputations, if any of our employees, officers or representatives were involved in fraudulent activity. Such activity includes, but is not limited to, lying, forgery, misappropriating assets, embezzlement, unauthorized handling of transactions and falsifying records or financial statements.

Besides these direct actions, carelessness and waste also drain the company's profitability and fall under the definition of fraud. If you discover or suspect fraudulent activity by anyone representing

Castings plc, you are required to report it immediately (see: “Where to turn for help”, “Avoiding bribery and corruption” and “Avoiding conflicts of interest” for more information related to fraudulent activities).

## **AVOIDING BRIBERY & CORRUPTION**

Gifts and hospitality do have constructive and positive roles to play in fostering good business relationships. However, if improperly handled, they can lead to accusations of bribery or corruption. With knowledge and transparency in all our actions, we can avoid even a hint of such activities.

No one at Castings plc may either directly or indirectly offer or authorize payment to influence or otherwise affect the impartiality of a second or third party in regards to Castings plc. Such payments include, but are not limited to, gifts and hospitality/hosting. Likewise, no one at Castings plc may demand or accept such a payment from a second or third party.

All gifts, hospitality or other payments must have a valid business purpose and not be lavish or extravagant. You are responsible for knowing what the limits are for your region and/or specific situation. If you are uncertain about giving or receiving a gift or other benefit, whether internally at Castings plc or involving a second or third party, contact your manager.

### **Gifts**

Legitimate gifts (whether cash, items, services, credits, discounts, or other) always have a valid business reason and are of nominal value and infrequent. To ensure correct handling of gifts, obtain prior approval from your manager before offering or accepting them. Promotional gifts must be imprinted with our logotype and preapproved for general distribution.

### **Hospitality & Hosting**

There are circumstances in which hospitality and “hosting” (paying/reimbursing a second or third party for travel, accommodation, entertainment, etc.) can be legitimately offered or accepted as part of a business meeting, demonstration, marketing, or other activity for Castings plc.

However, there are strict regulations governing this, which vary according to the location and/or situation. Be sure to familiarize yourself with the applicable rules and obtain pre-approval from your manager before making or accepting such offers.

## **AVOIDING CONFLICTS OF INTEREST**

All of us must act with impartiality and transparency in our work for Castings plc. No Castings plc employee should give or appear to give improper advantages to any individual, entity or organization on behalf of Castings plc. In addition, employees may not use their positions at Castings plc for inappropriate personal gain either for themselves or for family members, friends or other associates.

If a personal financial interest could call into question your impartiality or integrity, immediately disclose the situation to your manager. Although we respect individual privacy, we must step in to address conflicts of interest wherever they may occur, as even the appearance or accusation of such a conflict could negatively affect the company as well as the employee.

### **Working with Relatives or Friends**

Situations that may connect you in your role for Castings plc with relatives or friends in a business capacity require special care. The best practice is to avoid such situations altogether - to protect you, them and the Company - as these are common causes of conflicts of interest. This may include them entering into business deals with you or someone who reports to you, providing an indirect service within your scope of responsibility, or applying for a job for which you are the hiring manager.

Talk to your manager and your local Human Resource manager immediately when you become aware of such a situation. With your cooperation, we can quickly find the appropriate solution to prevent or resolve any conflict of interest.

### **Developing Relationships at Work**

Forming relationships at work is natural. However, romantic relationships between co-workers carry a high risk for conflict of interest – in particular, cases involving managers and team members or others with intersecting responsibilities within the Company.

Be open and honest in disclosing such relationships to your manager or your local Human Resource manager so that we may make accommodations to avoid conflicts of interest, which is in the best interest of you, your co-worker and the Company.

### **Outside Business or Civic Interests**

Although we are committed to giving our employees privacy in choosing and engaging in personal, social or civic activities outside of work, if any of these activities interfere with an employee's work for Castings plc, it can possibly create a conflict of interest.

Always discuss with and get approval from your manager before accepting or starting any employment or activities outside of Castings plc, whether paid or not, that could negatively impact your ability to deliver on your obligations to Castings plc.

### **Speaking Engagements**

Always discuss with and get approval from your manager and/or Castings plc group management before accepting, giving or participating in external speaking engagements, lectures, interviews, expert panels, or teaching opportunities on any topic related to your work or any of Castings plc's businesses, products, operations, etc.

### **Political Involvement**

In general, Castings plc maintains neutrality in political issues. However we will, of course, seek to protect our rights as a Company. If we do disagree with any laws, regulations, rulings, or political

positioning as they apply to our business, operations, vision and/or purpose, we will take any and all actions legally available to us to advance our position, acting with integrity in this as in all things.

As this is a highly sensitive area with strict regulations, only approved people at Castings plc or acting on behalf of Castings plc should be involved in such situations.

On an individual basis, Castings plc employees are welcome to take part in the political process according to the rights given to them by their country of citizenship and/or residence. However, this is a personal choice not to be affiliated with Castings plc. In other words, Castings plc's name, brand and resources must not be used to promote personal political agendas or beliefs.

## **ADHERING TO LAWS REGULATING COMPETITION/ ANTI-TRUST**

Competition/anti-trust laws are designed to protect fair business by limiting or prohibiting anti-competitive actions. This includes everything from price fixing and bid rigging to restricting supply, abusing a dominant position, or sharing sensitive market information.

Regulating this type of behaviour, of course, benefits all business, and Castings plc supports and follows such laws in all regions where we operate.

It is important that you understand what constitutes anti-competitive actions as it relates to your position and Castings plc in general. If you are uncertain, talk to your manager.

### **Selecting Suppliers, Contractors & Other Business Partners**

Excellent business partnerships are part of what makes our Company so successful. It's vital that we choose wisely from the start, selecting those partners who believe as we do and strive for high business ethics.

Our selection process is thorough, unbiased, and transparent. This ensures the best possible outcome for all parties, and also ensures there is not even an appearance of conflicts of interest, bribery, or other unlawful conduct.

We reserve the right to refuse or end business relationships with partners that do not go through Castings plc's open selection channels, breach any part of their business contract, and/or do not abide by the standards outlined in this Ethical Code of Conduct.

If you discover or suspect that this is not followed, you are required to report it immediately (see: "Where to turn for help").

## **SAFEGUARDING CONFIDENTIAL BUSINESS INFORMATION**

All of us at Castings plc are entrusted with protecting our Company, including the confidential information essential to our business success. This also includes confidential information entrusted to us by our customers about their businesses, operations, future planning, etc.



You are required to take all reasonable measures to protect confidential information. Other than for legitimate business reasons, you must not, either wilfully or through carelessness, disclose any of Castings plc's confidential information or that of our customers to third parties (including friends and family members).

### **Handling Requests for Information from Media, Investors, Etc.**

Castings plc receives many requests for information from the media, investors, analysts, shareholders, and the general public. We must ensure that any communication we have is appropriate, clear, professional and timely. There are strict regulations regarding communication, such as selective disclosure of non-public information, and it is vital to follow them to avoid making Castings plc and/or yourself liable to prosecution.

Therefore, we have designated specific departments and individuals within Castings plc that are knowledgeable about the legal issues or communication. Questions and information requests typically reach our senior management and other authorized communication departments first.

However, at times, companies or other individuals may directly contact other Castings plc departments or employees. If you receive such a request for information, do not comment. Instead, politely refer the individual to a member of senior management or your individual manager.

## **KEEPING ACCURATE ACCOUNTING RECORDS**

All Castings plc's accounting information must be recorded and filed in accordance with applicable laws, regulations and generally accepted accounting principles, including the International Financial Reporting Standards (IFRS).

The financial reporting shall also be in accordance the approved guidelines and accounting policies of Castings plc. It is essential to assure that the financial reporting gives a true, fair and complete presentation of the financial accounts and the financial position. It is also essential to make sure the communication due to financial reporting is open, clear and timely.

### **Expense Reporting & Documentation**

To ensure accurate company records, every employee must submit and document his or her business expenses in accordance with Castings plc policies and procedures. It is vital that your expense reports are always on time, complete and correct and that any expense you claim is legitimately business related. Relevant documentation is important, as you and/or Castings plc may need to prove the validity of expenses.

**“Every employee has a responsibility.”**

***“We believe that all people across the globe share basic, unquestionable rights. In all our business endeavours, we strive to uphold these, as set forth in the UN's Universal Declaration of Human Rights”.***

## **RESPECT FOR THE INDIVIDUAL: VALUING HUMAN RIGHTS**

### **CREATING & SUPPORTING A FAIR WORKPLACE**

To become a strong global team, we must support and strengthen each individual. Castings plc is committed to protecting our employees and encouraging high performance, upholding all relevant laws and regulations to do so. We co-operate internally, as well as with trade unions and other organizations that represent our team members, with the aim of ensuring that each employee feels listened to, cared for and respected.

#### **Equal Opportunity**

At Castings plc, we see value in differences. Diversity makes us stronger. Everyone - regardless of gender, race, religion, age, sexual orientation, marital status, or disability - has something valuable to offer and we believe all people should have equal opportunity to do so.

Therefore we hire employees based on merit, without prejudice. Castings plc does not tolerate discrimination - whether in recruitment, hiring, compensation, benefits, training, promotion, or any other form - based on any characteristic or situation protected by law.

#### **Zero-Tolerance for Harassment**

A company of integrity values the dignity of all people. At Castings plc, we treat each other with respect. We will not tolerate any form of abuse or harassment of or by employees, contractors, suppliers, customers or anyone else we interact with. This includes both physical actions as well as abusive or inappropriate language.

However, using frank and sincere language during performance conversations and reviews to discuss valid areas for performance improvement are not considered harassment.

### **RESPECTING EMPLOYEES' PERSONAL PRIVACY & INFORMATION**

We are committed to respecting people's privacy and the confidentiality of personal information. Castings plc does need to keep certain personal information for employees on record to provide benefits, ensure proper business operations, and/or comply with applicable laws.

We will not seek out or keep any personal information other than what is necessary for these reasons. Castings plc takes all required measures to ensure this information is kept safe and confidential, being visible and usable only to authorized individuals.

As part of these security measures, you are responsible for protecting and keeping confidential any personal employee information you have access to in your role at Castings plc.

Unless it interferes with an employee's work for Castings plc or threatens Castings plc's reputation, we make no judgment and take no action with respect to an employee's personal activities, interests, associations, etc.

## **Company Information Systems, Computers & Other Devices**

In the course of your duties for Castings plc, you may be granted access to the company's digital information systems. It is important to note that all documents, data, and other content created and/or stored in these systems is Castings plc property, with full rights.

This content is viewable by Castings plc employees, managers, officers, consultants, and auditors with appropriate authority. This also includes information created or stored on company-issued computers, mobile phones, tablets, and other devices.

Access to Castings plc computer systems and devices is granted to employees for legitimate business purposes only. Use of social media for approved Castings plc business purposes is allowed, although it's important to note that time spent on this should be used wisely in order to fulfil your complete responsibilities at Castings plc with excellence (see "Social media" for more information.)

## **Social Media**

As more and more brand interaction happens within social media, it's vital that we all be good ambassadors of our Company image. Digital and online information - from articles, opinions, and comments to photos and videos - should always be considered public, even if intended as private messages, particularly in social media.

As such, we expect all employees to take care not to post anything inappropriate or harmful to Castings plc, our employees or our customers. This applies both to job-related social media activity on behalf of Castings plc and also personal social media activity when mentioning Castings plc.

Never mention or in any way disclose confidential company information. Additional prohibited social media conduct includes, but is not limited to, posting, commenting on, sharing, or otherwise condoning defamatory, pornographic, proprietary, harassing, or libellous content.

Castings plc constantly monitors our Company image on social media, with automatic searches in place to catch mentions. We also rely on our employees to safeguard our brand.

If you come across any content online that could be harmful for Castings plc, report it to your manager immediately. If you work with social media on behalf of Castings plc and find yourself in a situation that is or could become hostile or lead to a breach of our Ethical Code of Conduct, remove yourself as politely and quickly as possible and contact your manager.

**"We have a responsibility to protect children from harm."**

## **CHILD & YOUTH LABOUR**

Children - all children - deserve care and support. Castings plc stands by the principles in the UN Convention on the Rights of the Child, that we as global citizens must protect children from economic exploitation, from dangerous work, and from all harm to their health, development or education.

The UN has tasked governments with setting a minimum age for employment, local rules will apply, and for ensuring the above principles are applied to all children. Our Company pledges to abide by the UN's standards and all laws and regulations governing employment of young people.

We expect all our business partners to abide by this as well, and will take necessary measures to ensure so, or otherwise end the business relationship.

If doubts arise about the age of a Castings plc employee or anyone working for our business Partners, or about the conditions in which any legally employed youth works, contact your manager immediately.

## **FORCED OR PRISON LABOUR**

Castings plc is committed to upholding the human rights of workers at any tier of its supply chain, and to treating them with dignity and respect. Castings plc therefore strictly prohibits the use of forced or prison labour and human trafficking in all Company operations and in our global supply chain.

## **FREEDOM OF ASSOCIATION**

Castings plc expects its suppliers to recognize the freely exercised right of workers, without distinction, to organize, further and defend their interests and to bargain collectively. Our suppliers should also protect those workers from any action or other form of discrimination related to the exercise of their right to organize, to carry out trade union activities and to bargain collectively.

***“We believe that all people across the globe share basic, unquestionable rights. In all our business endeavours we strive to uphold these, as set forth in the UN’s Universal Declaration of Human Rights”.***

## **PASSION FOR EXCELLENCE: SUCCESS IS OUR RESPONSIBILITY**

***“Our passion for excellence flows through everything we do at Castings plc. It has to because total commitment is the only way we can ensure success for ourselves, for our customers and for our partners. Our focus on excellence, of course, centres on producing quality products and services. Yet, it also includes protecting people’s health, safety, security and the environment, which includes reducing harmful emissions as well as risk of accidents, and ensuring efficient use of energy and natural resources”.***

## **SAFETY #1 PRIORITY**

We all need to be alert to safety risks as we go about our jobs. No matter what the deadline or pressure to perform, if you can't do it safely, don't do it. We simply cannot risk accidents that could hurt people or our surroundings – including the global environment.

Every employee is expected to promote a safe workplace, react and address any safety concerns that might occur. Regardless of the situation and who it concerns, always speak up and advocate for a safe environment, to ensure your own and your colleagues safety.

We also expect all managers to be role models for safety, as well as ensure that each employee understands and follows the overall safety and health policies and procedures for Castings plc as well as those related to his or her job function.

Always acknowledge safety concerns regardless of its origin and treat the source with respect.

### **Drugs & Substance Abuse**

Excellence and substance abuse do not mix. For the safety of all our employees and to guarantee our products and services are of the highest quality, Castings plc is committed to a “clean” workplace. We have zero tolerance for drug or substance abuse.

No employees may use or abuse drugs and/or other substances that could impair their motor skills, good judgment, or any other functions necessary to perform their work with excellence or that might compromise safety. This applies to both legal and illegal substances. If you need to take a medicine prescribed by your healthcare provider that might cause drowsiness or other impairments, talk to your manager immediately.

**“I follow the safety rules because I want to, not because I have to.”**

### **Anti-Violence Initiatives**

Castings plc has measures in place to help protect personnel, property and equipment at all of our locations. Yet, we all share responsibility for our Company's and our co-workers' security, starting with our own attitudes and actions.

Violence, threats and intimidation have no place at Castings plc. We will take swift action in any and all such cases, involving legal action against the offender(s) as necessary.

## **ENVIRONMENTAL RESPONSIBILITY**

We believe every person on this earth has a responsibility towards it. That's why all of us at Castings plc must work to ensure our impact on the world around us - the world we all live in – is positive; today and tomorrow.

Whenever there is a viable alternative, we must avoid materials and methods that cause harm or risk of harm to the environment. We rely on our employees to actively look for ways to make processes and products more environmentally responsible - from simple daily tasks to large-scale

production processes or product development. Wherever you see opportunities to reduce energy consumption, use raw materials more efficiently or otherwise be environmentally smarter, talk to your manager.