



## **Business Partner Criteria**

# Purpose

As a global, industrial company based in Orcoyen, Spain, Fluitecnik Group has more than 200 employees and customers in more than 50 countries. The vision of the Group is to be first in mind, first in choice for our customers, suppliers, and other business partners and stakeholders. Fluitecnik Group intends to achieve this by adhering to our core values, by being ethical in our business practices, and by working with business partners who share similar values and standards.

This Business Partner Criteria document supports Fluitecnik Group's implementation of our Code of Conduct by providing brief explanations of the Group's basic expectations of our business partners. Significant business partners must commit to Fluitecnik Group's Code of Conduct either by signing this document or by demonstrating having a comparable Code of Conduct.

Fluitecnik Group's Code of Conduct stipulates:

- At Fluitecnik Group, we are committed to upholding high standards of ethics in all our business interactions, which means that we require the same of our business partners.
- All business partners are expected to follow our Code of Conduct. We screen and audit our business partners to ensure that they share our standards regarding quality, business ethics, human rights, the environment, and resource efficiency. Business partners must cooperate in any audit by Fluitecnik Group when requested in writing in advance.
- We encourage our business partners to report perceived violations of our Code of Conduct.

**The Business Partner Criteria are based on our Code of Conduct, which is based on the following main international ethical frameworks supported by Fluitecnik Group:**



Fluitecnik Group's Code of Conduct can be found on our external website: [www.fluitecnik.com](http://www.fluitecnik.com)

# Business partner requirements

Business partners such as suppliers, subcontractors, joint venture partners, agents, resellers, or distributors must agree to uphold the Group's commitments and expectations in accordance with our Code of Conduct. If business partners use subcontractors for the production of Fluitechnik Group products or services, it is the responsibility of that business partner to use the same principles to evaluate and select their subcontractors. If requested, the business partner must inform Fluitechnik Group which subcontractors they use.

Business partners must, in all their activities, follow all laws and regulations applicable to their operations and employment in the countries in which they operate. Fluitechnik Group requirements may go beyond the requirements set out in local law, in which case the business partner must comply with the additional Fluitechnik Group requirements. In the event of contradictions between Fluitechnik Group's requirements and applicable laws and regulations, the business partner must notify Fluitechnik Group of the contradiction before signing this document.

Fluitechnik Group expects business partners to report any suspected violations of our Code of Conduct. We have an external reporting system, SpeakUp, which is available to all stakeholder and offers complete anonymity. Reports can be made in almost any language. Learn more about SpeakUp on our website.



## 1. Taking environmental responsibility and climate action

Business partners must have an approved Environmental Management System or otherwise show commitment to continuous improvement of their environmental performance and their environmental impact. This includes striving to minimize the environmental impact from e.g. production, digitalization, product use, transportation, or disposal of waste. All business partners should demonstrate an ambition and action to address climate change and must be committed to support the development and promotion of technologies that enable the transition to a low carbon society.



## 2. Complying with Fluitechnik Group prohibited and declarable lists

Business partners must comply with Fluitechnik Group's prohibited and declarable lists<sup>1</sup>, follow updates of the lists and alert Fluitechnik Group if any included substance poses a problem for compliance.

Fluitechnik Group's prohibited list identifies substances not to be used in any article delivered to Fluitechnik Group or in any production processes.

Fluitechnik Group's declarable list provides information about substances that should be limited in use. Business partners must declare any use of such listed substances in items delivered to Fluitechnik Group. The declarable list also includes conflict minerals<sup>2</sup>. If requested by Fluitechnik Group, business partners who provide parts, products, or raw materials that contain one or more conflict mineral, sourced from conflict-affected and high-risk countries<sup>3</sup>, must be willing to cooperate with any request to conduct due diligence following the OECD Due Diligence Guidance<sup>4</sup>.

<sup>1</sup>Our prohibited and declarable lists are published on our website: [www.fluitechnik.com](http://www.fluitechnik.com)

<sup>2</sup>Columbite-tantalite (coltan), cassiterite, gold, wolframite or their derivatives tin, tungsten and tantalum, both as minerals and metals, or any other mineral classified as a conflict mineral by the European Union or the United States.

<sup>3</sup>Conflict-affected and high-risk areas means areas in a state of armed conflict or fragile post-conflict as well as areas witnessing weak or non-existent governance and security, such as failed states, and widespread and systematic violations of international law, including human rights abuses.

<sup>4</sup>[OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](https://www.oecd.org/due-diligence/)



### 3. Supporting and respecting human rights

Business partners must support and respect the protection of human rights. They must confirm that they are not complicit in human rights abuses and comply with the main international ethical frameworks supported by Fluitecnik Group.



### 4. No modern slavery or forced labor

All forms of modern slavery, including forced and involuntary labor is unacceptable to Fluitecnik Group. This includes for instance requiring someone to work under the threat of penalty, due to debt bondage or other forms of coercion. Fluitecnik Group also prohibits business partners from requiring employees to deposit money or original documents such as passports, education certificates and the like during their employment.



### 5. No child labor

Fluitecnik Group prohibits the use of child labor. Business partners must take necessary preventive measures to ensure that they do not employ anyone below the legal age of employment. This means that no person younger than the age for completing compulsory education or younger than age 15 may be employed. Where local law stipulates a higher age limit, it shall be followed. For authorized minors, management is responsible for providing the working conditions, hours of work and wage appropriate for his or her age in compliance with relevant legal requirements as a minimum. The minimum age for hazardous work is 18 years.



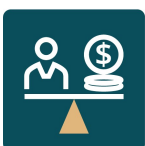
### 6. Eliminating discrimination

Business partners must support equal opportunities, fairness, and diversity and ensure that all employees are treated according to their abilities and qualifications in any employment decisions, regardless of age, disability, ethnicity, gender, gender identity, nationality, political opinion, religion, or sexual orientation.



### 7. Ensuring a safe and healthy working environment

Business partners are required to make employees' safety a priority at all times. Work premises and factory conditions must be such that workers can perform their functions in a safe and healthy environment, including fire prevention. To minimize risks, there must be appropriate policies to safeguard employee health and safety, training, and clear role descriptions. Facilities for employees must safeguard individuals' dignity and meet personal hygiene needs. Business partners must take appropriate action to ensure safety and prevent accidents and illnesses resulting from workplace conditions, on behalf of their employees. This includes availability of first aid and personal protection equipment, as well as correct and (where applicable) certified tools.



### 8. Fair wages and decent working time

All performance should be rewarded in a fair way. As a minimum, business partners must comply with relevant legal requirements and applicable collective bargaining agreements regarding working hours, overtime, breaks, leaves, wages, and benefits.



### **9. Freedom of association and the right to collective bargaining**

Business partners must confirm that their employees are free to communicate openly with management to resolve workplace and compensation issues. Employees have the right to choose whether to be represented by trade unions for the purpose of collective bargaining. Fluitechnik Group does not tolerate discrimination against any employee exercising such rights.



### **10. Intellectual property**

Business partners understand that intellectual property rights such as patents, trademarks, copyrights, designs, domain names, know-how, and trade secrets, are important business assets and fully commit to protect Fluitechnik Group's intellectual property rights, and to not reveal any information regarding intellectual property to third parties.



### **11. No corruption**

Business partners shall promote objective, fair, and ethical business, and work against all forms of corrupt practices. Business partners must comply with local laws and international anti-corruption conventions and must not offer anything to improperly influence Fluitechnik Group's employees or any third parties such as public officials.

Business partners shall avoid potential conflicts of interests and shall always inform Fluitechnik Group of a potential conflict of interest arising in the relationship between the business partner and Fluitechnik Group.



### **12. No anti-competitive behavior**

Business partners must commit to fair competition and agree not to enter into any discussions, formal or informal agreements with competitors concerning pricing, bids, market sharing or any other similar activities that are intended to prevent or restrict competition or result in the prevention or restriction of competition.



### **13. Complying with trade compliance obligations**

Business partners must commit to follow international treaties and agreements on non-proliferation of nuclear weapons, missile technology, chemical and biological weapons, as well as all applicable international trade, export control and economic sanctions regulations and regimes.

Goods and services that are being exported or imported must always be classified in a correct manner to ensure proper customs' declarations and that all necessary permits are obtained, and duties paid.



### **14. Data protection and privacy**

Business partners shall protect personal data and respect the right to privacy. This means that personnel and customers' personal data should be collected, used, and processed responsibly and lawfully.

The business partner shall implement appropriate safeguards to protect personal data against unauthorized use or disclosure.

# Compliance statement

Fluitechnik Group expects all our business partners to share our social and business ethics, environmental standards and commitments reflected in our Code of Conduct.

We regularly review our business relations and may terminate relationships with business partners who are unwilling to make changes to align with our standards and criteria. Fluitechnik Group expects our business partners to maintain adequate documentation to demonstrate their compliance with the Business Partner Criteria or demonstrate the intention and willingness to comply with the criteria, by establishing an action plan together with Fluitechnik Group.

If violations are detected, business partners may sign this Business Partner Criteria document if they are in the process of meeting these requirements and are willing to set up an action plan together with Fluitechnik Group.

As a condition of doing business with Fluitechnik Group, business partners and their subcontractors must authorize Fluitechnik Group and our designated agents (including third parties) to perform audits to safeguard and follow-up on compliance with the Business Partner Criteria. Onsite audits will always be arranged in advance, with the business partner's cooperation. Any onsite audit of business partner's subcontractors will be conducted upon agreement with the business partner.

**I, the undersigned authorized representative(s) of the business partner, has read and understood this Business Partner Criteria document, which is based on Fluitechnik Group's Code of Conduct, and hereby certify that the business partner accepts and commits to fully complying with all criteria and requirements in it.**

**Business partner name:** .....

**Signature of person authorized to sign on behalf of business partner:**

**Signature:** .....

**Name in block letters:** .....

**Job Title / Function:** .....

**Date signed:** .....

# References

**Corporate website:**

<https://www.fluitechnik.com>

**Fluitechnik Group's Code of Conduct:**

<https://fluitechnik.com/>

**Fluitechnik Group commits to these main international ethical frameworks:**

- International Labour Organization Declaration on Fundamental Principles and Rights at Work [[www.ilo.org](http://www.ilo.org)]
- OECD's Guidelines for Multinational Enterprises [[www.oecd.org](http://www.oecd.org)]
- UN Guiding Principles for Business and Human Rights [[www.ohchr.org](http://www.ohchr.org)]
- UN Global Compact [[www.unglobalcompact.org](http://www.unglobalcompact.org)]
- UN International Bill of Human Rights [[www.un.org](http://www.un.org)]

