



HH Global

Supplier Code of Conduct

Supporting Global Goals
in our Supply Chain

March 2020

Introduction

HH Global has always set very high standards for conducting business in a socially and environmentally responsible manner, with sound business ethics, and in compliance with all applicable laws and regulations.

HH Global supports the United Nations Sustainable Development Goals. If the goals are completed, it would mean an end extreme poverty, inequality and climate change by 2030. As a business, there is much we can do to support the global goals, and our commitment to the goals extends through our supply chain.

SUSTAINABLE DEVELOPMENT GOALS



THE 17 SUSTAINABLE DEVELOPMENT GOALS

HH Global is committed to the highest standards of service provision, product quality and business integrity in its dealings with its customers. HH Global is committed to ensuring that working conditions in HH Global's supply chain are safe, that workers are treated with respect and dignity, and that manufacturing processes are environmentally and socially responsible. HH Global is also committed to ensuring the security of its information together with the information that it holds on behalf of its customers. To this end we expect our Suppliers to be able to prove that they have appropriate security measures in place which are tested on a regular basis.

In turn, we expect the same standards and commitments from our Suppliers. This is why we have established the HH Global Supplier Code of Conduct. The principles within the Code speak to the commitments we make to our customers, our commitment to compliance with law, and our legacy of innovation and relationships built on trust and personal responsibility.

We will consider these principles in our selection of suppliers and will actively monitor their compliance. As a Supplier to HH Global, our Suppliers are required to comply with this Code. In turn, it is an HH Global requirement that our Suppliers will apply these standards to all the suppliers they work with in the delivery of goods and services for HH Global.

By working together to the standards contained in the Code, our companies will ensure that our actions benefit our companies, our customers and our communities.

Robert MacMillan
CEO
HH Global

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Definitions

“Code”	means the HH Supplier Code of Conduct
“Global Goals”	means the 17 Sustainable Development Goals, part of “Transforming our World: the 2030 Agenda for Sustainable Development” or 2030 Agenda. They are also known as the Global Goals for Sustainable Development.
“Supplier”	means the third party company who is providing goods and services to HH Global whether for its own use or for the benefit of HH Global’s customers.

Acceptance and impact of non-compliance

HH Global requires each of its Suppliers to acknowledge and support the Code and adhere to the standards and provisions it contains. By entering into a contract with HH Global or by accepting a purchase order from HH Global, the Supplier confirms acceptance of this Code.

A failure on the Supplier’s part to comply with the standards and provisions within the Code is likely to impact a Supplier’s future business relationships with HH Global and may lead to contractual and regulatory liabilities.

Audit rights

The Supplier acknowledges and agrees that

- HH Global has a right to request information and documentation from the Supplier to evidence its compliance with this Code;
- HH Global may attend at the Supplier’s site (and locations used by the Supplier in the delivery of the goods and services) to audit such compliance.

Reporting non-compliance/violations

Any violations or suspected violations of this Code should be reported immediately and in writing to:

For the EMEA Region

Marcus Newton
 Head of Strategic Sourcing
 HH Global
 Grove House
 Guildford Road, Leatherhead,
 Surrey. KT22 9DF
 United Kingdom.
 Email:
marcus.newton@hhglobal.com

For the Americas Region

Kathy Presto
 VP Strategic Sourcing
 HH Global
 520 Lake Cook Road
 Suite 680
 Deerfield
 Illinois, 60015
 United States
 Email: kathy.presto@hhglobal.com

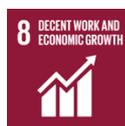
For the APAC Region

Louise Finlay
 Head of Strategic Sourcing
 HH Global
 Unit 01-03, 9/F
 Prosperity Millennia Plaza
 663 Kings Road
 North Point
 Hong Kong
 Email: louise.finlay@hhglobal.com

Labour and Human Rights

Forced Labour

Suppliers will not use forced or involuntary labour of any type (e.g. forced, bonded, indentured or involuntary prison labour). Suppliers will ensure that their hiring practices are in conformance with International Labour Organisation (ILO) Conventions for minimum age (Convention 138), child labour (Convention 182) and modern slavery. Suppliers are encouraged to develop lawful workplace apprenticeship programmes for the educational benefit of their workers, provided that all participants meet the minimum age requirements.



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all

Child Labour

Child labour is not allowed in any form.

Fair Employment

Suppliers should provide a workplace free from harsh and inhumane treatment, sexual harassment, abuse, mental or physical coercion, verbal abuse, or the threat of any such treatment. It is expected that suppliers document disciplinary procedures and grievances.

Freedom of Association

Suppliers should commit open and inclusive dialogue with their employees and their representatives. Employees should be free to join labour unions, seek representation, join works councils, and engage in collective bargaining.

Freely Chosen Employment

Suppliers will not use forced or involuntary labour of any type (e.g. forced, bonded, indentured or involuntary prison labour).

Modern Slavery

Modern slavery is a heinous crime that affects communities and individuals across the globe. Suppliers must ensure that their supply chain is transparent about the process through which it manages its employees.

In the UK suppliers are required to comply with the Modern Slavery Act 2015.

Working Conditions

Suppliers should provide safe and hygienic working conditions. Access to clean toilet facilities, drinking water, and sanitary food storage facilities must be provided.

Examples of actual or potential noncompliance

- Any type of forced, prison, indentured, or bonded labour
- Unreasonable restrictions placed on basic liberties
- Retaining original government-issued identification, passports or work permits without employee consent (retention of copies is permitted where required)
- Use of workers below the legal age of employment
- Incomplete or missing age-documentation records verifying the age of all employees when workers appear to be of unlawful age within the facility
- Forced labour and debt labour

Examples of good management practices

- Supplier's hiring practices, and those of any labour recruiters, prohibit forced or bonded labour. Supplier establishes a written set of instructions for all subcontractors and labour recruiters that prohibit forced labour and supplier requires certification of compliance
- Government-issued identification, passports or work permits are not withheld from the employee
- Supplier verifies the age of each worker prior to employment; Supplier ensures that young workers are only employed within the legally specified number of hours
- Supplier has a clear programme for hiring, training, and promoting apprentices
- Examine internal business procedures to avoid making demands of suppliers or subcontractors that might lead them to violate human rights, including children's rights

Wages and Working Hours

Suppliers will, at a minimum, comply with all applicable wage and hour laws and regulations as well as the Modern Slavery Act 2015 and HH Global's Labour Standard Policy, including those relating to minimum wages, overtime hours, piece rates and other elements of compensation, and provide legally mandated benefits. Workers should not be required to work more than 60 hours per week, including overtime, except in extraordinary business circumstances with their consent. Employees should be allowed at least one day off during a seven-day week.



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Wages

As a minimum, wages and benefits should meet national legal standards. Wages should be enough to meet basic needs and provide some discretionary income. Employees should receive all statutory benefits mandated by law, including, but not limited to, pension benefits, annual leave, and holidays.

Working Hours

Regular employment should be provided. Working hours must not be excessive. Overtime should be voluntary and not excessive. Employees should be provided with advance notice that overtime hours may be necessary.

Examples of good management practices

- Employees are provided payroll receipts that clearly indicate compensation, including overtime hours and overtime compensation levels
- Workers are educated on wage/pay practices
- Workers are encouraged through surveys to suggest changes/improvements in benefits
- Supplier maintains and applies systems to pay workers for overtime in accordance with applicable law
- Supplier has a process for identifying capacity restraints, to minimise overtime hours
- Copies of nationalisation records are kept (passport, government ID, etc.) for proof of legitimate in-country employment

Examples of actual or potential noncompliance

- Lack of compliance with minimum wage and overtime guidelines
- Incorrect pay records
- Miscalculation of wages
- Miscalculation of benefits
- Improper or unauthorised wage deductions
- Compensation not paid directly to workers, except as required by law or by voluntary employee authorisation
- Non-payment or late payment of wages
- Failure to provide employer/employee mandated benefits
- Failure to pay mandated compensation withholdings to the appropriate government agency
- Missing, incorrect, or no time records
- Not providing mandated rest day(s), public holiday(s), and vacations day(s)
- Denial of mandated meal and rest breaks
- Forced Labour and debt bondage

Health and Safety

Suppliers will provide their employees with a safe and healthy workplace in compliance with all applicable laws, regulations and sound industry practice and HH Global's Labour Standards Policy. Consistent with these obligations, HH Global Suppliers must have and implement effective programmes that encompass life safety, incident investigation, chemical safety, ergonomics, and other relevant protective elements.



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Health and Safety

Caution should be taken to minimise the risk of accident and injury. Employees should receive regular health and safety training, and accidents should be recorded.

Examples of actual or potential noncompliance

- Blocked aisles and passageways; blocked, locked, or no emergency exits
- Immediate fire hazards - (e.g. frayed electrical wiring, open flames, flammable vapours, etc.)
- No fire alarm system or public address system; inadequate fire extinguishers or fire-fighting equipment
- No evacuation plan, signage or drills
- Missing exit signs; insufficient or no emergency lighting
- Inadequate or missing machine guards; lack of other personal protective equipment or improper use of the same
- Unsafe worker exposure to hazardous chemicals or substances
- Hazardous chemicals or substances that are without proper labels and data sheets or kept in unsecure locations
- Missing handrails/guardrails on stairwells, elevated walkways or platforms
- Lack of fall protection above the height required under applicable local legislation
- Poor or inadequate ventilation, lighting, and temperature controls
- Missing or inadequate first-aid supplies or other provisions for emergency care
- Unsanitary or insufficient toilets, hand washing or canteen areas; no drinkable water
- Routine building and machine maintenance not performed

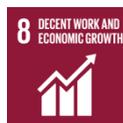
- Repetitive lifting or unusually heavy objects or work requiring extremely awkward postures
- Electrical hazards (e.g. bare wires, exposed electrical panels, ungrounded equipment, overloaded circuits)
- Uncontrolled confined spaces (e.g. tanks, pits, vaults, manholes) where there could be potentially hazardous atmospheres, insufficient oxygen levels, etc.

Examples of good management practices

- A management system has been implemented to identify and control potential hazards and to strive for continuous improvement (e.g. OHSAS 18001)
- A health and safety manager has been appointed to oversee compliance
- Employees are involved in safety programmes and management leadership is evident
- Health and safety education is provided during initial orientation and on an ongoing basis
- Workplace incidents are reported and investigated and action taken to minimise the potential for future occurrence
- Formal and informal management self-assessments are completed on a routine basis
- Health and safety trends (e.g. incidents, employee perceptions, regulatory deficiencies) are monitored and properly addressed
- New equipment, processes and facilities are reviewed for potential health and safety risks prior to initiation with full training provided to all operators
- Emergency evacuation drills are conducted regularly
- Emergency response capabilities are appropriate to the risk
- Health and safety professionals are consulted for guidance and evaluation

Respect and Dignity

Suppliers will treat all employees with respect and will not use corporal punishment, threats of violence or other forms of physical coercion or harassment. Supplier should have a policy that prohibits inappropriate conduct and a process for employees to report such conduct for Supplier's investigation and resolution.



Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all



Reduce inequality within and among countries

Respect and Dignity

Suppliers must not engage in harassing or physically or verbally abusive discipline, act in a threatening way towards employees or submit employees to demeaning conditions.

Indigenous and Rural Communities

Suppliers must respect indigenous and rural communities' legal, customary or user rights to their territories, land and resources.

Examples of prohibited abuse

- Threats to harm an employee's physical well-being
- Physical contact intended to harass, hurt, or harm, whether or not considered to be disciplinary action
- Comments which are understood by the employee to be harassing or demeaning
- Harassment based on race, religion, age, nationality, social or ethnic origin, sexual orientation, gender identity or expression, political affiliation, or disability
- Sexual harassment of any kind
- Discipline resulting in the withdrawal of basic physical comforts provided other workers
- Enforcing any action against the free will of the employee

Examples of actual or potential non-compliance

- Evidence of physical or sexual abuse or harassment
- Evidence of wage deductions or monetary fines used as discipline
- Lack of written policies prohibiting physical or sexual abuse or harassment
- Lack of feedback system between employees and management
- Evidence of failure to acknowledge indigenous and rural communities' legal, customary or user rights to their territories, land and resources

Examples of good management practices

- Written policies and practices are in place prohibiting harassment and abuse
- Supplier has established a training programme for management and supervisors delineating policies and disciplinary actions are clearly documented
- All disciplinary actions are non-physical and clearly documented
- The supplier has established a communication system or suggestion box where workers can raise issues of concern, including treatment by their supervisors or co-workers
- Supplier has a programme providing for investigation of worker concerns about illegal or unethical conduct, and resolves substantiated concerns with appropriate discipline according to its policies and practices
- Management communicates its written policies on respect and dignity to its employees
- Wherever possible employees should have an independent grievance escalation path. To ensure that any parties involved in the employee's original complaint are not directly effecting or influencing the investigation

Non-discrimination

Suppliers will not discriminate in hiring and employment practices on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, marital status, pregnancy, political affiliation, or disability, subject to local law.



Reduce inequality within and among countries

Diversity and Inclusion

Suppliers must not discriminate when recruiting, compensating, training, promoting, or terminating on the basis of race, national or social origin, gender, age, physical characteristics, disability, union membership, religion, family status, pregnancy, sexual orientation, gender identity, gender expression, or any unlawful criterion. Suppliers should promote an inclusive and supportive workplace, and exercise equal treatment and encourage diversity.

Respect and Dignity

Suppliers must respect indigenous and rural communities' legal, customary or user rights to their territories, land and resources.



Achieve gender equality and empower all women and girls

Gender Equality

Suppliers must comply with gender pay gap reporting legislation where applicable and develop plans to provide equal opportunities to employees irrespective of their gender.

Examples of actual or potential non-compliance

- Discrimination in hiring, employing, or terminating workers
- Substantial differences in the demographics of Supplier's workforce compared to other similar facilities in the local vicinity may indicate discriminatory practices
- Variations in pay, benefits or promotion based on grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, gender, gender identity or expression, political affiliation, or disability

- Health tests, pregnancy testing, or contraception used as a condition of employment
- Pregnant workers performing dangerous tasks
- Withholding mandated benefits such as maternity leave
- Lack of written hiring and employment policies
- Lack of feedback system between employees and management

plans to provide equal opportunities to employees irrespective of their gender.

Examples of good management practices

- Periodically reviewing hiring practices to determine that there is no prohibited discrimination
- Hiring agents and Supplier management who are trained in non-discrimination and applicable non discrimination laws
- Periodically training managers on non-discrimination
- Conducting interviews to determine that employees are being fairly compensated, including whether women workers are allowed to take maternity leave
- Creating written job descriptions that focus solely on "occupational qualifications", not personal characteristics
- Taking proactive action to hire and promote a diverse workforce
- Management communicates its written policies on non-discrimination to its employees

Environment

Suppliers will operate in a manner that is protective of the environment. At a minimum, Suppliers must comply with all applicable environmental laws, regulations and sound industry practices, such as requirements regarding chemical and waste management and disposal, recycling, industrial wastewater treatment and discharge, air emissions controls, environmental permits and environmental reporting. Suppliers must also comply with any additional environmental requirements called for in HH Global's design and product specifications, and contract documents. Suppliers must seek to reduce their environmental impacts and develop climate change adaptation and mitigation plans.



Ensure sustainable consumption and production patterns

Environmental Management

Suppliers should have a complete and effective environmental management system (EMS) (written policies, processes, and requirements for environmental protection and pollution prevention/ source reduction) that is in accordance with laws, regulations, and standards.

Natural Resource Conservation

Suppliers should conserve natural resources in their operations and sourcing practices.

Reuse and Recycling

Suppliers should re-use and recycle materials where possible. Products and packaging should be designed to simplify re-use and recycling.

Waste

All waste should be handled, moved, stored, recycled, re-used, and managed in compliance with local laws.

Examples of actual or potential non-compliance

- Supplier does not have a process to identify applicable laws, regulations, and standards
- Supplier does not have appropriate records documenting compliance to the law, such as required environmental monitoring, reporting, permits, etc.
- If specific environmental requirements have been made known to the Supplier by HH Global at the time of placing an order, the Supplier being unable to demonstrate that it is meeting those requirements
- Employees are not adequately trained on proper handling, use and storage of hazardous waste and on emergency procedures

- Supplier's chemical and waste management/pollution control systems and processes are not in compliance with applicable environmental laws, regulations, standards and sound industry practices. Examples of this include: unlawful disposal of chemicals or waste; uncontrolled air emissions; discharging untreated wastewater; chemicals not being properly used, managed, stored and disposed of; hazardous and combustible materials and waste not clearly marked and/or properly stored; use of banned substances; and improper use of pesticides or herbicides

Examples of good management practices

- Supplier conducts periodic environmental audits to confirm that its operations are environmentally responsible and are conducted in accordance with laws, regulations and standards, including certification to the ISO 14001 environmental management standard, or equivalent
- Supplier's staff and contractors have the necessary skills and training so they are familiar with the EMS and their role in meeting environmental requirements
- Supplier is proactive with respect to environmental protection and employees are encouraged and comfortable with raising issues of concern without fear of retaliation
- Supplier has programmes for the efficient use of materials and resources, including waste reduction, re-use and recycling, and post-consumer waste
- Supplier has programmes to review environmental performance of its supply chain, and acts meaningfully to improve performance throughout



Ensure access to affordable, reliable, sustainable and modern energy for all

Energy Consumption

Suppliers should have programmes for the efficient use and conservation of energy.



Ensure availability and sustainable management of water and sanitation for all

Water Consumption

Suppliers should have programmes for the efficient use and conservation of water.

Water Emissions

Suppliers must comply with local laws relating to water emissions and waste.



Take urgent action to combat climate change and its impacts

Transportation

Suppliers should seek to minimise the environmental impacts arising from transportation and logistics choices.



Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, and halt and reverse land degradation and halt biodiversity loss

Biodiversity

Suppliers should engage in practices that promote biodiversity.

Conservation and Protection

Suppliers should obtain materials from certified sources, and/or use sustainable alternatives. Suppliers must never source products from ancient, endangered or illegal sources.

Examples of actual or potential non-compliance

- Supplier obtains products from ancient, endangered or illegal sources

Examples of good management practices

- Supplier seeks to optimise sustainable energy techniques from solar, wind, water and other natural resources
- Supplier develops climate change adaptation and mitigation plans
- Supplier actively improves products by using sustainable alternatives and engages in conservation and protection efforts

Business Ethics

Legal and Ethical Dealings

Suppliers will comply with all applicable laws and regulations in all locations where they conduct business, especially with respect to strict compliance with all laws and regulations on bribery, corruption and prohibited business practices. HH Global expects suppliers to conduct their business in accordance with the highest ethical standards.



Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

Business Integrity

Suppliers must not practice or tolerate any form of fraud, corruption, extortion, embezzlement, or money laundering. Suppliers must not accept or offer bribes or any unlawful incentives from/to business partners and/or public officials.

Conflicts of Interest

Suppliers should make decisions free of any conflict of interest. A conflict of interest is where personal interests compete, or appear to compete, with the ability to perform or exercise impartial judgement.

Fair Competition

Suppliers should conduct business in compliance with fair competition and applicable anti-trust laws.

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Suppliers should conduct business in compliance with fair competition and applicable anti-trust laws.

Hospitality and Gifts

Save for gifts of low value and which are mere tokens, suppliers should not accept or offer gifts. Local laws should be followed, as gifts given inappropriately may violate these. Hospitality and gifts must be legal, within policy limits (for the giver and receiver), not cash or a cash equivalent, transparent and documented.

Examples of prohibited abuse

- Offering or accepting bribes or other forms of illegal payments

Examples of actual or potential non-compliance

- No postings of legally required wage, benefit, and health information
- Maintaining inadequate, out-of-date, or missing process and procedure documentation
- Ineffective monitoring of internal compliance performance
- Failure to review and act upon complaints about non-compliance from employees or others within a reasonable time period

Examples of good management practices

- Senior management supports compliance objectives and practices, and enforces them
- Supplier discloses potential and actual conflicts of interest to HH Global
- Supplier follows written policies and guidelines on conflicts of interest, giving and receiving of gifts, business trips, entertainment, the use of representatives and agents, and facility
- Supplier appoints an information security manager to manage and review policies and procedures

Security Compliance

Suppliers shall ensure that in providing the services it has appropriate information security protection measures to manage the risks to the information provided by HH Global and the Deliverables produced. As a minimum, information security protection should be included in the following areas: Information Security Management, Contingency Planning, Business Continuity and Disaster Recovery, Operations Security, Personnel Security, Communications Security and Physical Security together with evidence of testing in respect of the same.



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Disaster Recovery Planning

Suppliers must have a disaster recovery plan which is regularly tested, documented and reviewed.

Data Privacy

Suppliers must ensure that all employee, customer, and business partners' data privacy rights are respected.

Information Security

Suppliers must have appropriate controls in place to manage the risks to HH Global's proprietary information and third-party information entrusted to HH Global. In respect of Suppliers who will hold personal data, critical or highly critical data, HH Global will require the supplier to have an information security policy that is certified compliant with or (at HH Global's option) equivalent to ISO 27000 series.

Intellectual Property

Suppliers must safeguard and use confidential information appropriately and in compliance with all applicable legislation and regulation, ensuring that intellectual property rights are respected.

Vulnerability Testing

Suppliers will conduct regular penetration tests and vulnerability assessments to ensure continued compliance with this code and acknowledges that HH Global and/or a Customer may require access to the Supplier's systems or premises to audit such compliance.

Examples of actual or potential non-compliance

- Allowing open access by unauthorised third parties to the Supplier network or premises
- Not having appropriate firewalls and other secure IT practices
- Lack of controls around removable media
- The unencrypted transport of critical/personal data

Examples of good management practices

- Supplier appoints an information security manager to manage and review policies and procedures
- Ensuring that references are taken up when appointing staff and passes/secure access to premises are operational
- All staff have log in and passwords to access the supplier network and know not to issue these details to third parties or other members of staff
- Testing BCDR plans at least once per annum
- Performing penetration testing and vulnerability scans on a regular basis

Sustainable Procurement

Suppliers are expected to implement sustainable sourcing practices within their own organisation.

Their suppliers should be aware of and compliant with this Code of Conduct, to ensure that our standards are upheld throughout the supply chain.



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