



ENVIRONMENTAL TECHNOLOGY

# Supply Chain Code of Conduct

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## Introduction

Our suppliers are critical partners in our mission to be the world's leading global reliability business. As we strive to create a better world, the **AESSEAL® Supply Chain Code of Conduct** serves as an essential framework for all partners doing business with us. This Code defines the ethical, social, and environmental standards that allow us to deliver sealing solutions that enhance reliability and drastically reduce global energy and water consumption.

At AESSEAL®, our core values are the **guiding principles** running through everything we do. We expect our suppliers to embody these same principles:

- **Pursuing Excellence:** Continually improving and innovating.
- **Embracing Change:** Proactively managing evolution in technology and standards.
- **Honesty and Fairness:** Championing uncompromising integrity and ethical behavior.
- **Environmental Protection:** Committing to a sustainable future for our planet.
- **Happiness at Work:** Creating a safe and rewarding environments for all employees.

To reinforce our commitment, AESSEAL® has established a comprehensive **Supply Chain Code of Conduct**, which delineates expectations for all suppliers, contractors, and business partners. This Code is designed to ensure that the supply chain functions responsibly and in strict compliance with all applicable laws, regulations, and internationally recognised standards. The Code encompasses, but is not limited to, the following critical areas:

- **Human Rights and Labor Practices:** Upholding fundamental human rights, ensuring equitable treatment of all workers, and strictly prohibiting forced or child labour.
- **Health, Safety, and Environmental Stewardship:** Maintaining safe working conditions and implementing proactive measures to minimise environmental impact.
- **Ethical Business Conduct:** Enforcing a zero-tolerance policy towards corruption, bribery, and fraudulent activities.
- **Compliance and Transparency:** Ensuring full compliance with all relevant legal requirements and providing accurate and timely information upon request.

Compliance with the Code is a fundamental requirement for any supplier conducting business with AESSEAL, including our all branches listed on our “Branch Permissions Policy”. We reserve the right to perform audits or assessments to verify adherence to these standards. If necessary, appropriate measures will be taken with respect to our relationship with a supplier, which may include immediate termination for violations of international principles, unresolved breaches, or persistent non-compliance with this Code.

The subsequent sections of this document detail our expectations for suppliers, including core values, sustainability practices, and additional criteria necessary for conducting business with AESSEAL®.

Learn more about our Governance, Social position, Human Rights, Climate, and more by reading [here](#).

## Human Rights and Labour Practices.

AESSEAL® provides the world with reliability solutions that allow industry to thrive sustainably. We are committed to empowering all people within our ecosystem to thrive. This commitment aims to be an aspiring business for people to join, and be associated with our company, treating people with professionalism, dignity, and respect.

### Human Rights

AESSEAL® is committed to the protection and advancement of human rights wherever we operate. The use of forced labour, slavery, child labour, or human trafficking in any of our global operations or facilities including those operated by our suppliers, subcontractors, or distributors is strictly prohibited. Should we identify violations of these principles, AESSEAL® reserves the right, at its sole discretion, to discontinue the business relationship.

Read our Human Rights Policy for more information [here](#).

## Child Labour, Forced Labour & Fair Treatment

**AESSEAL® will not tolerate the use of child labour.** A “child” is defined as any individual under 15, regardless of local laws allowing younger employment.

Individuals aged 15–18 are considered “young persons” and may only undertake safe, supervised roles that do not interfere with their education or expose them to hazardous environments.

Suppliers must not withhold identification documents, passports, or travel papers.

Any form of forced labour—including modern slavery, involuntary overtime, or debt bondage—is strictly prohibited.

Mandatory overtime may only occur in accordance with local law and must never be used as punishment or coercion.

Visit our Modern Slavery Statement for more information [here](#).

## Diversity, Equity & Inclusion

AESSEAL® is a committed **Equal Opportunity Employer** and is dedicated to eliminating inequality and all forms of discrimination which include Age, Race, Ethnicity or National origin, Colour, Marital status, Sexual orientation, Disability, Sex & Religious beliefs.

Consequently, we require our suppliers to uphold **Zero Tolerance for Discrimination**. Suppliers must ensure that all employment decisions—including recruitment, hiring, placement, promotion, reward, and access to training—are based solely on an individual’s ability and performance.

We also encourage our partners to foster a diverse supply base by engaging with small businesses, as well as minority-owned and women-owned enterprises, to ensure that our supply chain mirrors the diversity of the communities in which we operate.

Read more about our Equal Opportunity Policy [here](#).



## Health, Safety & Environmental Stewardship

AESSEAL<sup>®</sup> is steadfast in its commitment to protecting the planet and is committed to maintaining a healthy and safe working environment and safeguarding the health, safety and welfare of its employees and those affected by its objectives and activities. This includes compliance with all legal and other requirements.

### Environmental Stewardship

Our core business function is inherently environmental: we design mechanical seals that help customers meet their environmental obligations by preventing hazardous fluid and gas leakage from rotating equipment. We require our suppliers to take a similarly holistic view of their environmental impact and align with our stringent environmental management system standards.

Suppliers are required to implement their own effective **environmental management system**. We strongly encourage adherence to internationally recognised standards such as BS EN ISO 14001 and ISO 50001 (Energy Management System), demonstrating a commitment to identifying and addressing main environmental impacts.

All suppliers must meet all applicable **environmental laws, regulations, permits, and international agreements** in the jurisdictions where they operate and must actively work to prevent pollution arising from their activities, products, and services.

In alignment with our “**Beyond Net Zero**” commitment and a target of **£29 million** invested in environmental projects by 2029, we require suppliers to measure and manage their carbon footprints.

As detailed in our Q-SEAL Manual, AESSEAL<sup>®</sup> is committed to the continual improvement of environmental performance. Suppliers must demonstrate their own objectives for improving environmental performance regarding their activities, products, and services. This includes having processes in place for the safe handling and storage of hazardous substances.

Suppliers must maintain accurate documentation of all environmental compliance and performance data. We reserve the right to audit these records and facilities to confirm adherence to this Code and relevant legal requirements.

Learn more about our “Environmental Policy” [here](#).

## Health & Safety

AESSEAL<sup>®</sup> is committed to maintaining a healthy and safe working environment and safeguarding the welfare of its employees and all individuals affected by its activities. We believe that every person should be able to return home safe, healthy, and happy after every working day. In line with our core value of "Happiness at Work," we expect our suppliers and contractors to co-operate with all health and safety arrangements and uphold these same high standards within their own operations.

Suppliers are required to comply with the following health and safety standards:

- **Management Systems:** Suppliers are encouraged to implement an Occupational Health and Safety Management System, such as ISO 45001, to identify risks and proactively manage workplace safety.
- **Safe Working Environment:** Suppliers must provide a workplace that is free from hazards, ensuring that all plant, machinery, and equipment are maintained in a safe condition with clear written instructions for use.
- **Risk Assessment and Mitigation:** Suppliers must regularly assess risks associated with their activities and take necessary steps to mitigate those risks, including the provision of appropriate Personal Protective Equipment (PPE).
- **Competence and Training:** Suppliers must ensure that all employees are properly inducted and trained for their specific roles, so they have the necessary competence to perform their work safely.
- **Emergency Preparedness:** Suppliers must have adequate first aid facilities on-site and clear procedures for responding to medical emergencies or accidents.
- **Hazardous Substances:** For any products or components supplied, suppliers must provide accurate Material Safety Data Sheets (MSDS) to ensure safe handling, storage, and disposal throughout the supply chain.
- **Compliance with Legislation:** Suppliers must comply with all relevant health and safety legislation and guidance in the jurisdictions where they operate.

AESSEAL<sup>®</sup> reserves the right to audit supplier facilities and safety records to ensure compliance with these requirements. Failure to maintain a safe working environment may lead to the discontinuation of the business relationship.

Read our "Health & Safety Policy" [here](#).

## Ethical Business Conduct

At AESSEAL<sup>®</sup>, **Honesty and Fairness** are foundational core values. We conduct our business with uncompromising integrity and expect our suppliers, contractors, and business partners to demonstrate the highest standards of ethical behaviour. Our reputation is built not only on the quality of our sealing solutions but also on the trust we establish with our stakeholders.

AESSEAL<sup>®</sup> requires all suppliers to adhere to our **Anti-Corruption and Bribery policy**. Suppliers must have a zero-tolerance policy regarding all forms of corruption, bribery, extortion, embezzlement and criminal activities. No supplier shall offer, give, seek, or receive any form of bribe or improper advantage to influence business decisions or obtain unfair preferential treatment.

We are committed to promoting fair and open competition across our supply chain. All employees, suppliers, and business partners must avoid any behaviour that restricts competition, including price fixing, bid rigging, market or customer allocation, collusion, or the exchange of commercially sensitive information with competitors.

All suppliers must ensure responsible sourcing of tin, tungsten, tantalum, and gold (3TG) and comply with all applicable conflict minerals regulations. Suppliers are required to conduct due diligence on their upstream supply chain, identify smelters and refiners, and provide complete and accurate conflict minerals reporting using recognised industry templates (such as the Responsible Minerals Initiative CMRT). Suppliers must immediately disclose any identified risks related to conflict-affected or high-risk areas and work with us to implement corrective actions where necessary.

For more details about it, check our Criminal Corporate Offense Policy [here](#).

**Suppliers are required to follow all relevant local and international laws**, such as the UK Bribery Act and applicable anti-money laundering rules. During their work with AESSEAL<sup>®</sup>, suppliers must avoid any situations that could create real or perceived conflicts of interest. If a potential conflict involves an AESSEAL<sup>®</sup> employee or representative, it should be reported immediately to the AESSEAL Compliance Committee.

Our suppliers are required to protect the confidential information and intellectual property of AESSEAL<sup>®</sup> and its customers. In line with global standards like GDPR, suppliers must ensure that personal data is handled securely and used only for authorised business purposes.

For more information, visit our AES Group Privacy Policy [here](#).

Suppliers must comply with all applicable international trade regulations, including export controls, economic sanctions, and customs requirements.

Our suppliers should provide a confidential mechanism for their employees to report unethical behaviour without fear of retaliation. We encourage any partner who becomes aware of a violation of this Code to report it directly to their AESSEAL<sup>®</sup> representative or the Compliance Committee.

AESSEAL<sup>®</sup> reserves the right to conduct assessments and investigations into ethical conduct. Non-compliance with these ethical standards is considered a material breach of our business agreement and may result in the immediate termination of the partnership.

Find our “Anti-Bribery & Corruption” policy [here](#).

Find our “Ethics” policy [here](#).

## Compliance and Transparency

At AESSEAL<sup>®</sup>, we believe that trust is built through visibility and accountability. As we navigate the complex global landscape, transparency is not optional; it is a fundamental requirement for maintaining a resilient and ethical supply chain. We expect our suppliers to be open, honest, and proactive in demonstrating their compliance with this Code and all applicable legal frameworks.

Suppliers must ensure full compliance with all relevant local, national, and international laws and regulations in the territories where they operate. This includes, but is not limited to, trade regulations, environmental mandates, and labour laws and maintain transparent and accurate business records, including financial statements, environmental reports, packaging material and waste regulation reporting, and labour documentation (such as payroll and working hour logs). These records must be kept in accordance with applicable laws and generally accepted accounting principles.



Suppliers are required to provide accurate and timely information upon request by AESSEAL<sup>®</sup>. This includes disclosing data related to carbon emissions for **CBAM** compliance, conflict minerals reporting, or evidence of fair labour practices. To ensure the integrity of our supply chain, AESSEAL<sup>®</sup> reserves the right to conduct audits, assessments, or site inspections. Suppliers must provide reasonable access to facilities, documents, and personnel during these evaluations to verify compliance with this Code. We expect our primary suppliers to exercise due diligence within their own supply chains. Suppliers must be able to identify and report on the origins of the materials and services provided to AESSEAL<sup>®</sup>, ensuring that our standards are upheld by subcontractors and secondary vendors.

We view compliance as a journey. Where gaps are identified, we expect suppliers to engage in corrective action plans. However, a failure to be transparent, or the intentional provision of false or misleading information, will be grounds for immediate termination of the business relationship.

## Partnership & Continuous Improvement

At AESSEAL<sup>®</sup>, we view our suppliers as true partners. Our suppliers have the right to have an open dialogue with us and to request clear and transparent feedback at any time. We will respond promptly sharing expectations, recognising good practice, and agreeing practical, time bound improvements where needed. Guided by our values of **Teamwork, Respect and Integrity**, we will always engage constructively and without retaliation when concerns are raised in good faith.

### Speak Out

AESSEAL<sup>®</sup> is committed to conducting business in accordance with the highest ethical and legal standards, failing to do so puts our name, reputation and business at risk. Whilst AESSEAL<sup>®</sup> strives to achieve market leadership and business success, achieving results through unethical business practices is not tolerated.

AESSEAL<sup>®</sup> encourages the reporting of any concerns or violations of this Code. Reports may be submitted anonymously via:

- **HOT LINE:** 0800 652 5087
- **Web:** [aesseal.ethicspoint.com](http://aesseal.ethicspoint.com)
- **Email:** [compliance.committee@aesseal.co.uk](mailto:compliance.committee@aesseal.co.uk)

By signing below, the undersigned acknowledges and agrees, on behalf of AESSEAL's supply chain entity, to comply fully with the AESSEAL® Supply Chain Code of Conduct as a condition of doing business. AESSEAL® reserves the right to review and, if necessary, terminate relationships where these standards are not met.

### Supply Chain Partner Acknowledgement and Signature

I, the undersigned, hereby acknowledge that I have read, understood, and agree to comply with the AESSEAL® Supply Chain Code of Conduct as outlined above.

## Version History

V	Date	Changes	Name
0	8 Jan 2026	Document release	Erika Marquez Padilla
1	19 Jan 2026	Document release	Emma Turner
2	23 Jan 2026	New paragraph added: Partnership & Continuous Improvement	Erika Marquez Padilla