HAGUE FASTENERS LIMITED

Supplier Code of Conduct

Code of conduct | Suppliers, subcontractors and service providers

DOCUMENT REF.	ISSUE	ISSUE DATE	REVIEW	OWNER
HF-SCC	3	13/10/2026	Annually	Managing Director

HAGUE FASTENERS LIMITED makes high-integrity fasteners for nuclear, defence, oil and gas and power generation customers. We expect every supplier to **act legally, ethically and responsibly**, to supply **genuine, accurately certified** material and services, and to **respect people and the environment**.

This Code forms part of every order we place, together with the Purchase Order and our Terms and Conditions of Purchase (HF-TCP).

Integrity
No bribery, no conflicts of interest, and genuine, accurate certificates.

People
Human rights respected; no forced or child labour; safe, fair workplaces.

Planet
Less waste, plastic and carbon; responsibly sourced minerals and materials.

Information
Our data and our customers' drawings kept secure and confidential.

01 Introduction

HAGUE FASTENERS LIMITED is committed to conducting business with integrity, fairness, and respect for people and the environment.

We expect our suppliers to share these values and to operate ethically, legally, and responsibly in all aspects of their business.

This Supplier Code of Conduct ("the Code") applies to all suppliers, subcontractors, and service providers, regardless of size, location, or frequency of supply.

By receiving this Code, suppliers are deemed to accept its principles unless they explicitly notify Hague Fasteners of any specific clauses they cannot comply with.

This Code sets out our ethical expectations. Where it refers to legal requirements, these must be met, and the Terms and Conditions of Purchase (HF-TCP) govern each contract under the laws of England and Wales.

02 Compliance with Laws and Regulations

Suppliers must:

- Comply with all applicable national and international laws, regulations, and industry standards in the jurisdictions where they operate.
- Ensure compliance is interpreted under the laws of England and Wales where legal requirements are specified.
- Observe requirements relating to wages, working hours, environmental protection, anti-bribery, anti-corruption, health and safety, competition, and fair trade.

03 Ethical Business Practices

3.1 Anti-Bribery and Corruption

Suppliers must have zero tolerance for bribery, corruption, facilitation payments, or kickbacks.

They must comply with laws such as the UK Bribery Act 2010 and ensure procedures prevent corrupt practices.

3.2 Fair Competition

Suppliers must comply with competition and antitrust laws, avoiding collusion, price-fixing, or any conduct that restricts fair trade.

3.3 Conflicts of Interest

Suppliers must avoid actual or perceived conflicts of interest and disclose any that arise during their engagement with Hague Fasteners.

3.4 Product Integrity

Suppliers must ensure that certificates, test reports and other records supplied to Hague Fasteners are accurate, complete and genuine. Falsified or misleading documentation, and counterfeit or suspect items, are serious breaches of this Code and must be reported immediately if discovered.

04 Human Rights, Labour Standards, and Harassment

4.1 Human Rights

Suppliers must respect internationally recognised human rights, including those in the Universal Declaration of Human Rights and ILO core conventions.

4.2 Forced and Child Labour

No forced, bonded, trafficked, or child labour is permitted. Minimum working age must meet local law and ILO standards. Suppliers must take steps to prevent modern slavery and human trafficking in their own business and supply chains, in line with the Modern Slavery Act 2015 and our Modern Slavery Act 2015 Policy.

4.3 Equality and Non-Discrimination

Suppliers must provide equal opportunity in employment and must not discriminate based on personal characteristics, beliefs, or union membership.

4.4 Harassment

Suppliers must comply with Hague Fasteners' Harassment Policy Statement for Third-Party Customers and Suppliers and ensure all interactions with Hague Fasteners' personnel are respectful, professional, and free from harassment, bullying, or intimidation.

05 Health and Safety

Suppliers must:

- Provide a safe and healthy working environment.
- Maintain protective equipment, safety training, and emergency procedures.
- Comply with all relevant health and safety legislation.

06 Environmental Responsibility

6.1 Environmental Management

Suppliers must follow robust environmental processes aligned with ISO 14001 principles and work to minimise waste, pollution, and emissions. They are encouraged to share Hague Fasteners' commitment to sustainability, as demonstrated through initiatives such as the Hague Forest tree-planting programme.

6.2 Packaging and Waste

Suppliers must:

- Reduce single-use plastic packaging and comply with the UK Plastic Packaging Tax (PPT) where applicable.
- Use recyclable, reusable, or biodegradable packaging wherever possible.

6.3 Climate Impact

Suppliers are encouraged to measure their carbon footprint, reduce energy consumption, and set emissions-reduction targets.

07 Responsible Sourcing and Trade Compliance

7.1 Conflict Minerals

Suppliers must comply with Responsible Minerals Initiative (RMI) requirements and exercise due diligence to ensure that tin, tungsten, tantalum, and gold are sourced responsibly and are free from conflict-related origins, and provide a Conflict Minerals Reporting Template (CMRT) or equivalent on request.

7.2 CBAM and Material Origin

Suppliers must:

- Comply with Carbon Border Adjustment Mechanism (CBAM) reporting obligations where applicable.
- Provide accurate material origin documentation for raw materials and components.
- Supply supporting certification or sanctions compliance evidence where required. Generic compliance statements without evidence are not acceptable.

7.3 Import/Export Controls

Suppliers must comply with all import, export, sanctions, and trade regulations, including accurate customs declarations.

7.4 Restricted Substances

Suppliers must tell us if anything they supply contains a substance restricted or listed under UK or EU REACH, RoHS or PFAS restrictions, and provide declarations on request, so that we can meet our REACH Statement, RoHS Compliance Statement and Restricted Substances & Materials Compliance Assurance (PFAS).

7.5 Counterfeit, Fraudulent and Suspect Items

Suppliers must supply only genuine material and parts from legitimate sources, with traceable certification, and must never supply counterfeit, fraudulent or suspect items. Suspected items must be quarantined and reported to us immediately (CFSI Policy).

08 Data Protection, Cybersecurity, and Confidentiality

8.1 Data Protection

Suppliers must comply with the UK GDPR, the Data Protection Act 2018 and other applicable data protection laws when processing any Hague Fasteners data.

8.2 Cybersecurity

Suppliers must maintain appropriate security measures to prevent data breaches, ransomware, or unauthorised access.

Any suspected or confirmed data breach affecting Hague Fasteners' information must be reported immediately to JonHague@HagueFasteners.co.uk.

8.3 Confidentiality and Non-Disclosure

Where a formal Non-Disclosure Agreement (NDA) is not in place, suppliers must treat all information received from Hague Fasteners as confidential and use it solely for the purposes of fulfilling their obligations to Hague Fasteners.

Such information must not be disclosed to any third party without prior written consent from Hague Fasteners.

This includes, but is not limited to, technical drawings, specifications, pricing, business processes, and other commercially sensitive information. The obligation of confidentiality continues after the completion of any supply or business relationship.

09 Monitoring and Auditing

Hague Fasteners reserves the right to conduct audits of suppliers with reasonable prior notice.

Suppliers must ensure their own supply chain meets equivalent standards and must cooperate in any compliance reviews.

10 Reporting Concerns

Suppliers should report any suspected breaches of this Code to:

General reporting	Purchasing@HagueFasteners.co.uk
Confidential disclosures	JonHague@HagueFasteners.co.uk

Concerns can also be raised in confidence with our independent contact, **Lee Tidman, ISO Quality Support** (07764 235 133, isoquality@outlook.com), under our Speak Up (Whistleblowing) Policy (HF-POL-WB). We will not tolerate retaliation against anyone who raises a concern in good faith.

11 Non-Compliance

Hague Fasteners will work constructively with suppliers to resolve issues and implement corrective actions.

Termination of supply relationships will be considered only as a last resort if remediation is not possible or breaches are severe and ongoing.

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APPROVED AND SIGNED

SIGNATURE 

DATE 13 October 2026

NAME
Jon Hague

POSITION
Managing Director,
HAGUE FASTENERS LIMITED

REVISION HISTORY

Issue	Date	Details of change
3	13/10/2026	Summary and principles added; modern slavery, conflict minerals reporting (CMRT), restricted substances (REACH, RoHS, PFAS) and counterfeit items added; independent Speak Up contact replaces the planned reporting channel; data protection law updated to UK GDPR.
2	12/10/2026	Updated
1	Not recorded	First issue