



HAGUE FASTENERS LIMITED

HIGH INTEGRITY SPECIAL FASTENERS IN CRITICAL ALLOYS

Monmer Close, Willenhall, West Midlands, WV13 1JR, United Kingdom

Registered in England No: 3292586 VAT GB346974609

Hague Fasteners Supplier Code of Conduct

1. 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 is an ethical document, not a legal contract, but certain sections require legal compliance under the laws of England and Wales.

2. 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.

3. 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.

4. 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.

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.

5. 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.

6. 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.

7. 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.

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.

8. Data Protection, Cybersecurity, and Confidentiality

8.1 Data Protection

Suppliers must comply with GDPR 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.

9. 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:

Purchasing@HagueFasteners.co.uk (general reporting)
JonHague@HagueFasteners.co.uk (confidential disclosures)

A third-party anonymous reporting channel will be introduced in the future and communicated to all suppliers.

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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