

Revised: November 27, 2025

Version: 2

Scope: Global

Data Classification: Public

# Supplier Code of Conduct



DONCASTERS

# VISION - TO BE A GLOBAL LEADER IN TURNING METALS INTO MOTION

## MISSION STATEMENT

We supply our global customers with complex, high quality, competitive products for the aerospace, automotive and industrial gas turbine industries. Employing cutting edge technology and processes our highly skilled and experienced team will deliver these products on time every time.

## OUR VALUES

### EXCELLENCE

We strive to deliver high-quality, precision work, by continuously improving our systems, processes, and training. We learn from our mistakes. We acknowledge and celebrate success.

### COMMITMENT

We are passionate about providing the best possible service to customers and each other. We will go the extra mile to deliver our promises. We understand and hold ourselves accountable for our actions and the impact of what we do - on the business, on our customers, communities, and the wider environment. We positively drive action and accountability.

### INTEGRITY

We are honest and transparent in dealings with our colleagues, customers, suppliers and partners. It means always doing the ethical thing and respecting the environment at every level of our organisation and within the communities where we operate. It also means holding each other to account for doing things the Doncasters way. We are known for our trustworthiness and courage.

### TEAMWORK

We build and value strong partnerships with colleagues, customers, and suppliers, by working hard to break down any barriers, respecting differences and valuing different viewpoints. We act as one team and all pull together in the same direction.



## MESSAGE FROM OUR CHIEF EXECUTIVE

We are proud of what we are building at Doncasters. Since its formation in 1778, the company has gone through a number of changes, as has the world in which it operates. Behaviours that were once customary are no longer acceptable.

As a key supplier to Doncasters we need to ensure that you share a common code of behaviour and that you also recognise our values. We appreciate our relationship with you, as you play an essential part in helping create a more environmentally and socially responsible supply chain.

This Supplier Code of Conduct (Code) sets out the principles and behaviours that we expect you to adhere to, and extend into your own supply chain. We expect you not only to act in accordance with all relevant laws, regulations, and licenses but to operate with the highest ethical standards when doing business..

All suppliers must familiarise themselves with this Code and with the supporting policies underpinning it. Illegal acts or breaches of the Code will not be tolerated. Consequences may include termination of our relationship with you.

We are committed to developing a culture where everyone within our organisation and supply chain feels comfortable to raise any concern, no matter how small. If you have a question, please raise it with your account manager. Alternatively, you can email [report@doncasters.com](mailto:report@doncasters.com). If you would prefer to raise a concern anonymously



you can do so via our Speak Up service, you can find the contact details of this independent service on page 4 and also on our website.

The Board and I fully endorse the Code and we expect all of our supply chain partners to do the same.

**Mike Quinn**  
Chief Executive Officer  
Doncasters Group

# CONTENTS

- 3 Introduction**
- 4 How to Report Concerns**
- 5 Health & Safety**
- 6 Respect for Each Other**
- 7 Bribery & Corruption**
- 8 Fair competition**
- 9 Conflict of Interest**
- 10 Conflict minerals**
- 11 Human rights**
- 12 Money Laundering and Tax Evasion**
- 13 Export Controls and Sanctions**
- 14 Working with our customers, suppliers and partners**
- 15 Respecting data privacy and confidentiality**
- 16 Accuracy and integrity in business records**
- 17 Quality**
- 18 Safeguarding our assets**
- 19 Media and Communication**
- 20 The environment**
- 21 Appendices**
- 22 Making ethical decisions using the code**
- 23 Q&A**
- 24 Pause and think**

# INTRODUCTION

## 1. WHY IS THE CODE IMPORTANT?

This Code defines the basic requirements for doing business with Doncasters. We require full commitment to the Code from all our suppliers and third-party intermediaries. Confirmation of compliance with the Code and related policies are an integral part of our procurement process. All suppliers are required to adhere to the principles of this Code.

## 2. WHO DOES THE CODE APPLY TO?

Please raise any breaches of the Code with us, we are here to help. In the event of a breach of the Code we will work with you to try to fix any issues. However, if you disregard or act in a manner that is incompatible with the Code this may lead to termination of our relationship. If a breach of the Code leads to criminal prosecution, we will support the relevant authorities in their action.

## 3. BREACHES OF THE CODE

During the supplier onboarding process, you will be required to confirm that you have read, understood, and are committed to upholding the principles of the Code.

# HOW TO REPORT CONCERNS

## SPEAK UP

It is the responsibility of us all to uphold relevant laws.

If you become aware that a law may have been broken or that anyone in your organisation or supply chain or in our group of companies is breaching the principles set out in this Code, then please Speak Up.

Ignorance of the law is no excuse, so if you have any concerns and would like to discuss them you may seek

guidance from either your own legal team (if you have one) or from Doncasters Legal team by emailing us at [report@doncasters.com](mailto:report@doncasters.com)

We hope you will feel comfortable raising issues with your account manager or via email at [report@doncasters.com](mailto:report@doncasters.com). Doncasters also has an external, independent reporting service available to you to raise issues anonymously.

However, you choose to report we will treat every issue seriously and will follow up.

Our confidential reporting service is run by an independent company called Navex.

## REPORT ONLINE

[www.doncasters.navexone.eu](http://www.doncasters.navexone.eu)

If using a smartphone, scan:



## REPORT BY PHONE

From the UK:  
Call: **0800 890 011**  
(when prompted, dial: **833 537 0829**)

From the USA:  
Call: **833-537-0829**

From Germany:  
Call: **0800 225 5288**  
(when prompted, dial: **833 537 0829**)

From India:  
Call: **000 800 050 3406**

From Mexico:  
For outside calls, dial your local access code followed by **800-288-2872**.  
Por Cobrar Spanish: **800-112-2020**  
(when prompted, dial: **833 537 0829**)

From China:  
Call: **400 120 8504**

# HEALTH & SAFETY

## OUR PRINCIPLE:

We expect everyone to help maintain a safe and healthy work environment with no injuries or work-related ill health. We believe through commitment, robust management and compliance with legislation/industry best practice, we can eliminate or reduce these risks to a safe level. We expect you to support us in this whilst working on our sites and to implement equivalent standards in your workplace.

## WHAT WE EXPECT OF YOU:

- We set high standards for HS&E behaviour and expect you to do the same in your workplace
- Make sure you understand and follow the HS&E requirements when on any of our sites. Please familiarise yourself with our Global Health and Safety Policy which is available from your account manager and complete a health and safety induction when attending any of our sites for the first time
- Seek support from the HS&E team if required
- Stop work if you think it is unsafe to you or others
- Intervene if you are concerned that health or safety is being compromised and escalate concerns to the site Health and Safety manager as required
- Ensure you understand the risks associated with your work and take all necessary precautions for as long as the job lasts
- Act responsibly at all times – we do not tolerate the possession, distribution or use of drugs or alcohol in the workplace
- Report and actively learn from incidents, including near misses

## DO NOT:

- Put yourself or others at risk from your behaviour
- Wait for someone else to report safety concerns
- Compromise our safety standards to meet deadlines or to save money

# RESPECT FOR EACH OTHER

## OUR PRINCIPLE:

We treat each other with respect, valuing diversity. We promote an inclusive workplace in which we help each other develop and grow. We have established internal rules for the fair treatment of others, our employees are free to lodge complaints without fear of reprisal. We expect you to have adopted and embedded similar principles and standards in your workplace operations.

## WHAT WE EXPECT OF YOU:

- Be open, honest, and courteous to everyone you meet in the course of business
- Recruit, select, develop, and promote people on merit, using objective criteria based on qualifications, skills, and experience
- Value diversity and promote equal opportunities in the workplace
- Support and encourage people to achieve the right balance between work and home life
- Speak up if you see or hear of behaviour, you consider to be inappropriate
- Value colleagues' opinions, listen to what they have to say and seek feedback from them to develop and improve how you work

## DO NOT:

- Tolerate bullying, harassment, or any form of discrimination
- Engage in sexual harassment including unwanted physical contact, expressions gestures, comments, or invitations
- Behave in a disrespectful, intimidating, offensive or malicious way or make jokes which may offend others
- Exclude others from projects, discussions, and opportunities due to their race, colour, gender, religion, age, sexual orientation, marital status, disability, or any other characteristic that is protected by law

# BRIBERY AND CORRUPTION

## OUR PRINCIPLE:

We have a zero tolerance approach to bribery and corruption. We do not offer, promise, give, or accept bribes or kickbacks in any form whether directly or through a third party. We expect you to have a program in place to prevent bribery, fraud and corruption and to have procedures in place in accordance with all applicable laws. This includes without limitation, the UK Bribery Act 2010, UK Finance Act 2017 (Criminal Facilitation of Tax Evasion) and the US Foreign Corrupt Practices Act 1977.

## WHAT WE EXPECT OF YOU:

- Tolerate no form of bribery
- Understand and help us enforce our rules on gifts and hospitality
- Cooperate with any investigation required
- Report all incidents and/or suspicions of bribery

## DO NOT:

- Grant, offer or promise anything in return for favorable treatment or to gain an advantage
- Engage directly or indirectly in any form of bribery
- Offer or accept gifts, hospitality or entertainment which might affect our employees' judgement when dealing with you
- Make illegal facilitation payments

# FAIR COMPETITION

## OUR PRINCIPLES:

We believe in open and fair competition, we conduct business in an honest and transparent manner and we comply with competition and antitrust laws and regulations. We expect you to do the same..

## WHAT WE EXPECT OF YOU:

- Act in accordance with national and international competition laws
- Respect trade secrets and the intellectual property rights of others

## DO NOT:

- Participate in price fixing with competitors
- Discuss bids for a contract with competitors
- Agree to share markets or customers
- Share information which reduces competition in the market
- Abuse any market dominance that we may hold

# CONFLICT OF INTEREST

## OUR PRINCIPLE:

We avoid conflicts of interest in our business dealings, but if they occur, we manage them transparently. We expect you to do the same and to notify us of any potential conflict of interest in your dealings with us.

## WHAT WE EXPECT OF YOU:

- Report any potential conflict of interest to your account manager as soon as you become aware of it
- Avoid and/or disclose to Doncasters all conflicts of interest that may influence business relationships
- Ensure that you have your own processes and procedures in place to record and manage conflicts of interest and potential conflicts of interest
- Comply with any applicable laws or regulations in relation to the employment or engagement of current or former military and civilian government personnel

## DO NOT:

- Encourage, engage in, or facilitate insider dealing
- Use any non- public information about our business or other companies in the buying or selling of shares, other securities, or financial instruments for personal gain

# CONFLICT MINERALS

## OUR PRINCIPLE:

We do everything we can to ensure that we do not use products containing conflict minerals. We have a policy and controls in place to monitor and prevent the use of minerals sourced illegally or unethically. We expect you to implement equivalent standards and controls in your operations and supply chains.

## WHAT WE EXPECT OF YOU:

- Consider the risks within your supply chain as part of your procurement process
- Complete appropriate due diligence on your suppliers to eliminate the risk of conflict minerals within your supply chain
- Ethically source your supplies, including minerals from reputable organisations

## DO NOT:

- Engage if you feel there is any risk around conflict minerals
- Look the other way or think someone else will raise the concern.
- Knowingly procure conflict minerals
- Supply products to us which consist of materials that have not been procured in a responsible manner and are “conflict affected” as set out in the OECD Guidance

# HUMAN RIGHTS

## OUR PRINCIPLES:

We require all businesses in our supply chain to share our commitment to respecting, protecting, and promoting human rights. This includes alignment to the United Nations, Guiding Principles on Business and Human Rights. We do everything we can to prevent modern slavery, child labour or forced labour within our own organisation and that of our supply chain. We expect you to do the same.

## WHAT WE EXPECT OF YOU:

- Be aware of the risks around modern slavery, child labour or forced labour within your own business and your supply chain
- Report any suspected incidents or concerns
- Ensure employment is freely chosen and respect the right of collective bargaining
- Provide safe and hygienic working conditions
- Adhere to all applicable working-hours regulations globally
- Pay fair wages for labour and adhere to all applicable wage and compensation laws globally.
- Observe country specific legislation concerning the minimum age for employees for both hazardous and non-hazardous work and verify and document the date of birth of all new employees
- Publish an annual statement on our website setting out the steps we are taking to ensure modern slavery is not taking place in our business or supply chain

## DO NOT:

- Look the other way or think someone else will raise the concern
- Employ workers under the relevant legal age
- Pay wages which are below the applicable wage laws
- Require employees to work excessive hours
- Harshly or inhumanely treat employees competitors

# MONEY LAUNDERING AND TAX EVASION

## OUR PRINCIPLE:

We are committed to conducting all of our business in an honest and ethical manner. We act professionally, fairly and with integrity in all of our operations, business dealings and relationships worldwide and we implement and enforce effective systems to demonstrate our zero-tolerance approach and the importance we attach to preventing money laundering, tax evasion, potential tax evasion and corporate criminal offences of any nature. We expect you to implement equivalent control systems in your business and throughout your supply chain.

## WHAT WE EXPECT OF YOU:

- Comply with all applicable multi-jurisdictional laws and regulations related to the prevention of money laundering and all relevant local anti-money laundering regulations in the countries in which you operate
- Take appropriate, risk-based measures to verify the identify and economy background of your business partners and other third parties and the origin of payments to ensure they come from legitimate sources
- Follow up on suspicious business relationships, activities and transactions immediately and report them to law enforcement authorities, when necessary

## DO NOT:

- Ask us to do anything which helps you to evade tax
- Help others to evade tax
- Raise invoices or other contractual documents which do not reflect the agreed commercial situation, and which include false information
- Accept payments in cash
- Make a payment to, or accept a payment from, an entity that is not a party to a transaction
- Ship orders in a manner inconsistent with standard procedures
- Conduct foreign exchange operations with unauthorised institutions

# EXPORT CONTROLS AND SANCTIONS

## OUR PRINCIPLE:

We respect and follow all applicable trade sanctions, export controls, and import laws, knowing that some of our goods are subject to legal restrictions. We expect you to do the same.

## WHAT WE EXPECT OF YOU:

- Comply with applicable export and import laws and regulations
- Check for national and international sanctions and embargoes when doing business with individuals and companies overseas
- Ensure you understand what the rules are
- Be alert for suspicious enquiries from individuals or organisations attempting to gain access to our products which may be denied to them sanctions or embargoes
- Make sure all duties, levies and tax obligations are satisfied, and that terms and conditions of any import or export authorisations are complied with and that any necessary import or export declarations are made including those to the custom authority and the point of exit/entry

## DO NOT:

- Turn a blind eye to sanctions or export controls

# WORKING WITH OUR CUSTOMERS, SUPPLIERS AND PARTNERS

## OUR PRINCIPLE:

We act with integrity and are trustworthy in all our dealings with customers, suppliers and other third parties. We seek to build mutually beneficial relationships based on integrity and transparency. We expect you to do the same.

## WHAT WE EXPECT OF YOU:

- Build and maintain high levels of customer satisfaction by continuously seeking to improve quality, delivery, responsiveness, and reliability
- Communicate clearly and honestly; however, take care not to breach confidential obligations
- Make sure information you disclose is accurate and current
- Ensure you pick your suppliers based on merit
- Follow appropriate quality and safety management procedures to ensure our products are of excellent quality
- Deal with concerns or complaints, quickly and with courtesy, finding mutually acceptable practical solutions where possible
- Take appropriate steps if the actions of your suppliers or partners are not in line with this Code

## DO NOT:

- Leave customers waiting or try to pass their complaints on to others
- Ignore feedback

# RESPECTING DATA PRIVACY AND CONFIDENTIALITY

## OUR PRINCIPLE

We respect the data privacy, proprietary information, and confidentiality of others, including our employees, customers, suppliers, partners, and anyone else we come across during our business and we expect you to do the same.

We act with integrity, following applicable laws, regulations, and company policies in protecting confidential information including commercial, personal, and sensitive data.

## WHAT WE EXPECT OF YOU:

- Make sure you have the right permissions before you use or share data
- Think twice before you save, share, or destroy data
- Ask yourselves whether you would want that data known about you
- Talk to your manager or the relevant person in your company if you have concerns about how information is secured, processed, or shared

## DO NOT:

- Obtain competitive intelligence by illegal or unethical means
- Try to access information that is not required for your legitimate business purposes
- Ask for or accept confidential, proprietary or trade secret information that a person is not authorised to share

# ACCURACY AND INTEGRITY IN BUSINESS RECORDS

## OUR PRINCIPLE

We are committed to keeping accurate, and complete records and ensuring integrity in our business records. We expect you to do the same.

## WHAT WE EXPECT OF YOU:

- Maintain accurate and complete records in your business dealings, especially when they relate to our products, our accounts or maintaining our inventory
- Act in accordance with the law and applicable technical and professional rules and standards
- Prepare your financial records in a timely manner, representing the facts accurately and completely
- Maintain a rigorous system of financial, operational and compliance controls
- Maintain an effective system of risk management, understanding that we all own risk
- Report any suspicions of fraud you have to the relevant person within your company and to your account manager at Doncasters

## DO NOT:

- Look the other way if you think a colleague is not behaving as they should. Fraud is a criminal offence which will not be tolerated by us
- Over report the hours you have worked, under report breaks, or falsify records to make yourself look good
- Falsify data or deliberately mislead

# QUALITY

## OUR PRINCIPLE

We recognise that the quality and efficiency of our products and services are essential to us retaining our reputation and growing as a business. Our suppliers play a key role in ensuring the quality of our products. We expect you to comply with all quality requirements as set out in our contract with you.

## WHAT WE EXPECT OF YOU:

- Take responsibility for your part in delivering high quality products that meet our customers' requirements
- Follow quality management procedures to ensure the integrity of our products and services
- Take action to address any concerns about quality issues
- Report any potential product safety or quality issues so that they can be addressed

## DO NOT:

- Take risks or become complacent when working; do not cut corners to save time or costs
- Ignore potential or actual product safety risks or wait for someone else to speak up

# SAFEGUARDING OUR ASSETS

## OUR PRINCIPLE

We protect our company property and use it responsibly. We expect you to do the same.

## WHAT WE EXPECT OF YOU:

- Protect our company assets and property and ensure that our intellectual property is kept securely
- Use all company assets appropriately for our business
- Use technology and internet appropriately to ensure these systems are protected from external threats

## DO NOT:

- Use company assets for personal benefit
- Share company assets, including intellectual property with a third party without prior authorisation
- Never improperly obtain or use third party assets or third-party intellectual property without proper license or approval
- Offer or supply information which Doncasters should not have

# MEDIA AND COMMUNICATION

## OUR PRINCIPLE

We protect our brand and look to build our reputation. We expect you to do the same.

## WHAT WE EXPECT OF YOU:

- Use care and good judgement when speaking about our business or people, even when not in the workplace

## DO NOT:

- Make any statements abouts us without the prior approval of Doncasters
- Make misleading statements
- Talk to the media without involving our Communications team
- Make vulgar, obscene, threatening, intimidating, harassing, libellous, discriminatory, or derogative comments about Doncasters, our colleagues, suppliers, customers or any third party ever but especially not on social media

# THE ENVIRONMENT

---

## OUR PRINCIPLE

We act responsibly towards the environment, minimising any negative impact and working for a sustainable future. We act in accordance with the applicable statutory and international standards regarding environmental protection, in order to minimise adverse environmental impacts and make continual improvements in environmental protection. We expect you to do the same.

## WHAT WE EXPECT OF YOU:

- Measure your environmental impact relating to energy, water, and natural resources
- Manage your resources and disposal of waste responsibly, controlling your emissions
- Comply with environmental regulations and monitor your performance
- Encourage all employees, contractors, and suppliers to support our efforts to work sustainably and protect the environment

## DO NOT:

- Ignore the environmental impact of your operations
- Exceed legal or regulatory emission targets
- Act irresponsibly when disposing of waste

# APPENDICES - USEFUL TOOLS

---

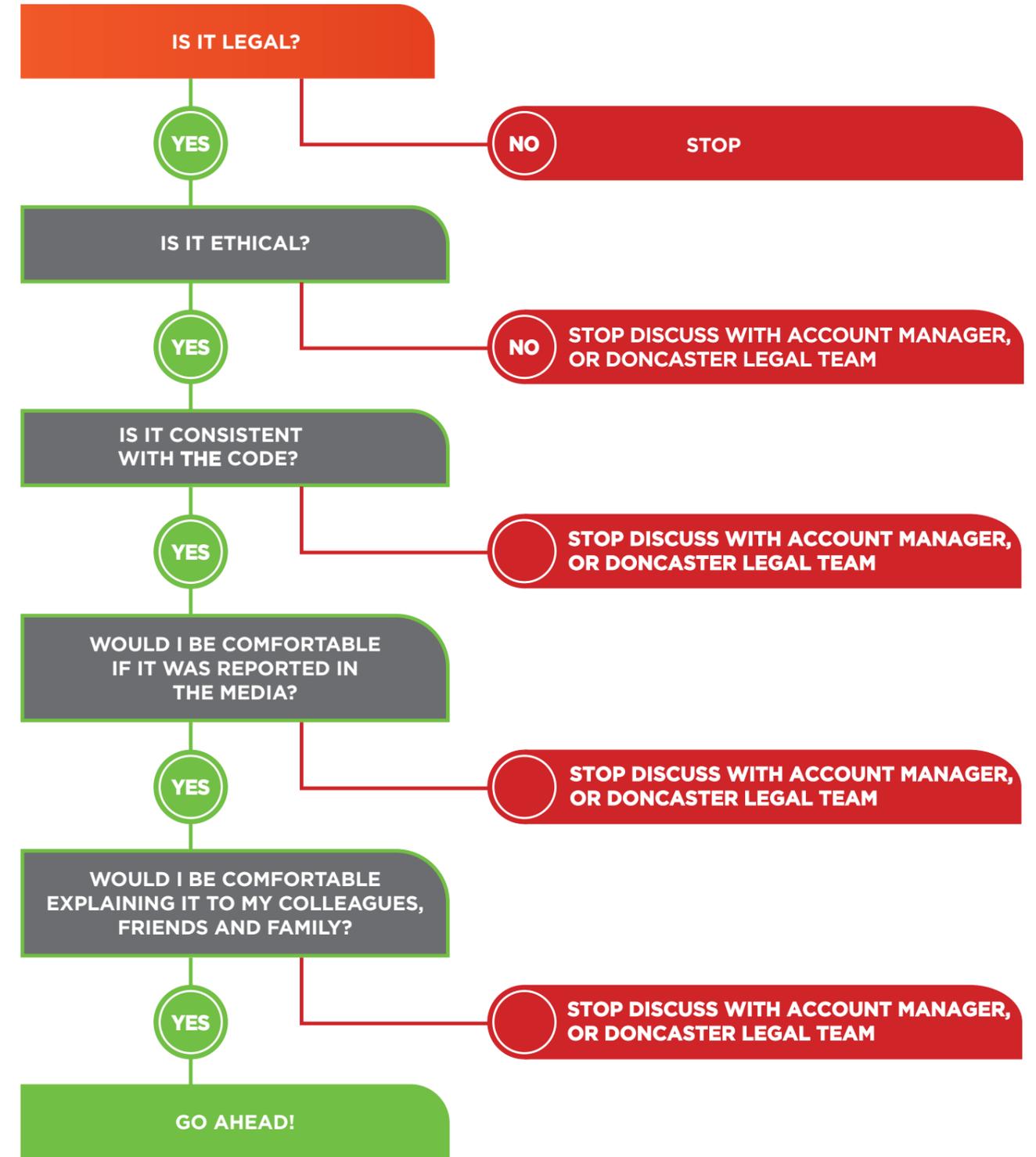
# MAKING ETHICAL DECISIONS USING THE CODE

Most of the time we will know what to do to ensure we do the right thing. However occasionally we may be faced with a new situation.

By following the decision tree, we can ensure we stay within the principles set out in our Code.



## When faced with a decision: **pause... think**



## Q&A

**I suspect that my company is using child labour – when I was in their factory the other week some of their workers looked really young – what should I do?**

You should raise this with your line manager in your organisation and with the account manager at Doncasters. We are committed to ensuring none of our suppliers unlawfully exploit their workforce.

**We supply to Doncasters' competitors. One of my colleagues has asked if I can let them know what prices we are selling to Doncasters at – can I tell him?**

No, a regulatory authority is likely to conclude that your colleague will use this information to inform their own pricing decisions. If you are unsure whether you should share pricing information across competitors, please raise this with the relevant member of your company, who will help you navigate this complex area.

**At a recent trade fair, I overheard two competitors sharing details of their profit margin on a particular product line. The information could be useful can I share it with my boss?**

No, a regulatory authority may conclude that that they shared this information to tacitly align prices, if you share this with your boss you are tempting him to do the same – even though he was not in the original conversation. If you are unsure whether you should share pricing information across competitors please speak to the relevant member of your company, who will help you navigate this complex area.





**DONCASTERS**