



Severn Group

Supplier Code of Conduct

OCTOBER 2024

The Severn Group Supplier Code of Conduct defines the behaviours and rules that our business expects our people and suppliers to adopt, which contributes to our success.

 **Bentley**

 **MCEGROUP**

 **SEVERN**

 **VALV TECHNOLOGIES**



Excellence

Message from the CEO

At Severn Group excellence is our benchmark. We are committed to doing business ethically, with integrity and in full compliance with our legal and regulatory obligations. Our Supplier Code of Conduct (later referred to as the Code) sets the standard and expectations that must be met by any company, partnership or individual that provides goods or services to any member of Severn Group (later referred to as "Supplier(s)").



We want to work collaboratively and be proud not only of who we are and what we achieve but also of how we achieve it, by doing the right things in the right way.

Broken down, the Code requires a few simple things. First, always follow the relevant laws and regulations. Second, embrace our Group values. Third, raise any concerns about compliance to this Supplier Code with us.

Compliance with the Supplier Code is mandatory for all our Suppliers. If you are unsure about the Code I encourage you to ask questions and raise your concerns.

Thank you for embracing our values and for your part in making Severn Group the leading valve specialist for critical service and demanding applications

Sincerely,

Perttu Louhiluoto
Chief Executive Officer



Excellence

Introduction

Severn Group (meaning, collectively, Contour Technologies Limited and its subsidiaries, including but not limited to Severn Glocon UK Valves Limited, LB Bentley Limited, MCE Group Limited, Severn Glocon Valves Private Limited, ValvTechnologies LLC) values its reputation and is committed to maintaining the highest possible ethical standards in all its business activities. We will apply these standards to all dealings with employees, customers, suppliers and other stakeholders. This Supplier Code of Conduct is not intended to address every situation so please contact us if you wish to report an incident, speak about an issue that may be causing concern, or simply have questions about the Supplier Code.

In carrying out its activities for, and performing its obligations to, Severn Group, each Supplier must comply with the standards set out in this Supplier Code.





Excellence

Our Vision

The leading valve specialist for critical service and demanding applications.

Severn Group aims to build a family of complementary, specialist, high-end valve engineering and manufacturing companies, establishing a leading global force in the energy and industrial valve market.

Our Values

At Severn Group, our business success flows from expertise – from technical knowledge and experience that position us as a leader in our field. Not everything, however, can be engineered. The Values which underpin that success stem instinctively from the culture we seek to sustain. Everything we do is tested against our Values, and our people are encouraged to apply them every day: they are the stewards of our brand, our reputation, our heritage, our ambitions.





Excellence

Legal & Employment Standards

Severn Group expects all Suppliers to comply fully with all relevant local and international laws and act in accordance with local guidelines and regulations, including those which are industry specific. We expect all Suppliers to co-operate fully with relevant public authorities and regulatory bodies as appropriate.

Severn Group requires all Suppliers to adhere to applicable labour laws. All workers must be able to work in a safe environment free from discrimination and harassment. Workers must be paid for their work at a rate that meets the standards set by applicable local laws and should be free to leave at any point.

If there is a conflict between any applicable laws or regulations, the agreement between the Supplier and the relevant member of Severn Group, and this Supplier Code, the Supplier shall meet the most stringent standard.

Freedom of Association

Suppliers must respect workers rights to form, not join or join a labour union or other organisation of their choice, and to bargain collectively in support of their mutual interests.

Modern Slavery & Human Trafficking

Severn Group is committed to preventing slavery and human trafficking from occurring in any of our corporate activities around the world as well as seeking to ensure our supply chains are also free from such practices.

All Suppliers must comply with all applicable anti-slavery and human trafficking laws, statutes, regulations in any part of its supply chain.

Health & Safety

Suppliers must provide safe and healthy working conditions for the prevention of work-related injury and ill health as appropriate to the purpose, size and context of the organisation, and to the specific nature of its risks and opportunities, and comply with all relevant Health, Safety and Environmental laws.

Any Supplier Representative or Subcontractor that comes onsite at any Severn Group facility is required to adhere to the Severn Group Health & Safety Policy at all times.



Integrity

Equality, Inclusion and Diversity

Severn Group operates in many different parts of the world each with its own unique cultural identity. We continually strive to understand and value our different backgrounds, perspectives and experiences and by leveraging these differences we encourage innovation. All Suppliers must embrace an inclusive, respectful environment which provides equal opportunities for all.

Anti-Bribery and Corruption

Compliance with anti-bribery and corruption laws is critical to protecting Severn Group's reputation and business. Severn Group prohibits corrupt practices in any form, including bribery, kickbacks and other unlawful payments.

Any conflict of interest or potential conflict of interest must be disclosed prior to any business relationship being conducted.

All Suppliers must maintain the highest ethical standards and shall comply with all applicable laws, statutes, codes, and regulations relating to the prevention of bribery and corruption

Corporate Gifts and Hospitality

Gifts and entertainment can create perceptions of bribery or favouritism. Suppliers must not offer any gifts or invitations to Severn Group Employees that could be construed as bribes to obtain improper business advantages.

Unfair Business Practices

Suppliers must comply with all applicable competition laws including but not limited to those relating to teaming and information sharing with competitors, price fixing, and rigging bids.



Integrity

Materials

Severn Group recognises that there are serious human rights issues associated with the extraction, transportation and trade in certain minerals, often referred to as "Conflict Minerals".

Severn Group is committed to sourcing only Conflict Free Minerals and expects the same from its Suppliers. If a Direct Supplier is found to supply us with conflict minerals that have not been procured through a validated supply chain or that are otherwise found to have financed conflict, we will take action such as recommending that Supplier seek alternative means of sourcing, or we will reassess the Supplier relationship which may result in removing the Supplier from the approved vendor list.

Customers

At Severn Group our customers are our priority and we expect all Suppliers to consistently work towards meeting our customer needs and expectations. This includes but is not limited to, quality, lead time, costs, and innovation.

Data Protection

Suppliers must always comply with all applicable laws and regulations regarding data protection.

Each Supplier must protect the integrity and confidentiality of information (including information belonging to or supplied by Severn Group held on its systems (which include physical and online or electronic systems) and ensure that there is no unauthorised access of the information by third parties or its personnel.

Cybersecurity

It is essential that Suppliers safeguard the integrity and security of their systems and comply with the relevant standards and guidance. Suppliers must inform us at dpo@severnvalve.com if they become aware of any cyber security incident that affects or has the potential to affect Severn Group.



Accountability

Respecting the Environment

We aim to minimise the impact of our operations and our products on the environment and continue to improve our environmental performance. Our Suppliers must share that same commitment and have their own Environmental Policy or be prepared to adopt ours.

In any event, each Supplier must ensure that (a) its operations comply with all applicable environmental laws, including laws and international treaties relating to (but not limited to) climate change, waste disposal, emissions, discharges and hazardous and toxic material handling, (b) the goods it manufactures (including the inputs and components that it incorporates into its goods) comply with all environmental laws and treaties and (c) it will only use packaging materials that comply with all applicable environmental laws and treaties.

Tax evasion and Fraud

Suppliers must not engage or be involved (whether directly or indirectly) in any activity, practice or conduct which would constitute any tax evasion or tax evasion facilitation or fraud offence under any Applicable Laws.

Sanctions

Suppliers shall comply with all Applicable Laws relating to economic or financial, trade, immigration, aircraft, shipping or other sanctions, export controls, trade embargoes or restrictive measures from time to time imposed, administered or enforced by any other governmental authority, and in each case their respective governmental, judicial or regulatory institutions, agencies, departments and authorities.

Certification & Reporting

The Supplier shall monitor its compliance with this Code and shall immediately report any breaches (actual or suspected) of this Code to Severn Group.

The Supplier shall provide written confirmation to Severn Group that: it has appropriate systems in place to monitor its compliance with this Code; and it is able to comply with this Code for the duration of its relationship with Severn Group.



Accountability

Breach & Termination

Severn Group may immediately terminate its business relationship with the Supplier (including any contracts) where Severn Group becomes aware of, or has reason to believe of, any breach of this Code by the Supplier or its personnel.

Supplier's Confirmation

By signing this Code, the Supplier:

- confirms that it fulfils the requirements in, and will (at all times) comply with, this Code; and
- acknowledges that any breach of this Code will allow Severn Group to terminate its relationship with the Supplier with immediate effect.

Supplier Name	
Signed by	
Date	



Accountability





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Customer



Integrity



Excellence



Accountability



SEVERN
Superior Valve Engineering