	<b>Ethical sourcing policy</b>	VCOMP_ESP
Revision 2	Authorised by: C Whitehouse	Date: 05.10.21

The aim of this policy is to outline areas of ethical sourcing. The areas of ethical sourcing include the below subjects.

**Supply chain adherence.**

VSMPO-AVISMA Corporation is the parent company of VSMPO Tirus Ltd its wholly owned UK distribution and stockist center.

The products we supply are in accordance with compliance obligations for REACH and Conflict Minerals. We comply with the regulations and adhere to customer requirements as required.

**Safe and healthy environment.**

It is our duty as a business to apply safe practices and supply a safe working environment for employees and other interested parties when any activity is carried out on behalf of VSMPO Tirus Ltd. Risk management is an on-going continual process so that supply to customers is met without any employee or other interested party being introduced to any unethical working practices.

**Packaging sourcing.**

The packaging surrounding our products is predominantly wood. The wood is heat treated and ISPM stamped. Employees that source new packaging are trained to source locally and fairly. All products must be sourced from reputable companies and should carry the necessary certification / markings for transport.

**Equal opportunity and human rights.**

It is this organization’s policy to treat all job applicants and employees fairly and equally, regardless of their sex, gender status, sexual orientation, religion or belief, marital status, civil partnership status, age, race, colour, nationality, national origins, ethnic origin or disability.

**Code of conduct.**

We aim to provide a good working relationship with both employees and all interested parties by establishing and maintaining core business values.

**Social responsibility.**

VSMPO Tirus Ltd believes that it is important for the organisation and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace. Good ethics are important to ensure that the organisation meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, the organisation is committed to ensuring high ethical standards within the workplace.

**Bribery and corruption.**

VSMPO Tirus Limited recognises that an essential element of corporate social responsibility is honest and transparent trading. Bribery and corruption creates a disincentive to trade as well as uneven trading conditions that can damage economic systems and the individuals within them.


VSMPO Tirus Limited has a clear policy and we support our employees to make decisions in line with our stated position. Our conduct is based on our commitment to acting professionally, fairly and with integrity. VSMPO Tirus Limited does not tolerate any form of bribery and corruption.

**Slavery and human trafficking.**

Slavery and human trafficking remains a hidden blight on our global society. We all have a responsibly to be alert to the risks, however small, in our business and in the wider supply chain. Staff are expected to report concerns and management are expected to act upon them.

**Export and Import.**

VSMPO Tirus Limited is committed to complying with all applicable export, import, and trade compliance laws in all countries in which we do business. This includes laws and regulations pertaining to trade embargoes and economic sanctions, export control, anti-boycott, cargo security, import classification and valuation, product/country of origin marking, and free trade agreements. In conducting business across borders, all VSMPO Tirus Limited employees must

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be aware of and follow these laws. Should VSMPO Tirus Limited's policies conflict with local law, employees must always obey the law.

**GDPR.**

General Data Protection Regulation 2018 (GDPR) and all other data protection legislation is in force at VSMPO Tirus Ltd. All employees have been notified of the regulation and how we will protect their personal information. VSMPO Tirus does not engage in contacting new business for sale of goods through email or cold calling. There is a website available for customers to pursue products and services.

**Propriety information.**

Is, information or data whether oral or written rightfully possessed and kept private within the company, that is developed or acquired at company expense, that may be valuable to others is proprietary information. Examples of proprietary information are included in memos, engineering note books, sketches, drawings, specifications, reports, computer software and computer software documentation, manuals, models, and other articles relating to processes, designs, techniques or procedures that the company has developed or acquired on its own initiative. This definition includes not only company generated information, but also proprietary information accepted by the company from others including clients and company affiliated companies.

**IT Data protection.**

The Data Protection Act 1998 is concerned with the processing of computerised and manual information about living individuals (personal data) and gives rights of access to the individuals who are the subject of that information. Further to this, the Act places certain obligations on the organisation's data user, in respect of the personal information it processes or causes to be processed on its behalf by third parties. A data user must notify the Information Commissioner unless covered by the exclusions in the Act.

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