



**Supplier Code of Conduct**  
WI-11-03, Rev. 1  
Release Date: 07/25/2023  
Approved By: Jordan Lubenstein

## Purpose

To describe the Sperry supplier code of conduct.

## Requirements

### **Introduction:**

At Sperry Rail Services, we are committed to conducting our business in a manner that upholds the highest ethical standards, promotes sustainability, and ensures the well-being of people and the planet. We recognize that our suppliers play a critical role in our success, and we expect them to share our commitment to ethical practices and social responsibility. This Supplier Code of Conduct outlines the principles and expectations that all suppliers must adhere to when doing business with us.

### **Compliance with Laws and Regulations:**

Suppliers must comply with all applicable laws, regulations, and industry standards in the countries where they operate. This includes, but is not limited to, labor laws, environmental regulations, health and safety standards, and product quality requirements.

### **Labor and Human Rights:**

- a. Forced Labor: Suppliers must not use any form of forced or compulsory labor, including prison labor or bonded labor.
- b. Child Labor: Suppliers must not employ workers who are below the legal working age as defined by the country's laws or the International Labor Organization (ILO) standards.
- c. Non-Discrimination: Suppliers must treat their employees with respect and dignity, ensuring equal opportunities for all, regardless of race, gender, religion, age, disability, nationality, or any other protected characteristic.

### **Working Conditions:**

Suppliers are expected to provide safe and healthy working conditions for their employees. This includes compliance with occupational health and safety laws, access to clean drinking water, proper sanitation facilities, and adequate working hours in accordance with local laws.

### **Environmental Responsibility:**

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Suppliers should strive to minimize their environmental impact by implementing environmentally responsible practices. This includes waste reduction, energy efficiency, responsible water usage, and compliance with environmental regulations.

#### **Business Ethics:**

Suppliers must conduct their business with integrity, honesty, and transparency. They should avoid any form of bribery, corruption, or unethical business practices.

#### **Supply Chain Transparency:**

Suppliers must provide accurate and transparent information about their supply chain upon request. This includes the origin of raw materials, labor practices at subcontractors' facilities, and other relevant details.

#### **Conflict Minerals:**

Suppliers must comply with regulations regarding the sourcing of conflict minerals. They should not source minerals from conflict-affected regions without appropriate due diligence.

#### **Intellectual Property and Confidentiality:**

Suppliers must respect the intellectual property rights of others and maintain the confidentiality of any proprietary or sensitive information shared by our company.

#### **Continuous Improvement:**

Suppliers should strive for continuous improvement in their operations, making efforts to enhance their sustainability practices and aligning with best industry practices.

#### **Reporting and Remediation:**

Suppliers are encouraged to promptly report any violations of this code or any concerns related to ethical practices or social responsibility. We will work collaboratively to address any issues and implement appropriate remedies.

#### **Failure to Comply:**

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Non-compliance with this Supplier Code of Conduct may result in various actions, including, but not limited to, audits, corrective action plans, termination of the business relationship, or legal action as deemed necessary.

By doing business with Sperry Rail Services, suppliers agree to abide by this Supplier Code of Conduct and actively uphold its principles. This policy represents our commitment to responsible and sustainable business practices, and we look forward to collaborating with suppliers who share this vision.

**Related Documentation**[SOP-11 Purchasing and Receiving](#)

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