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Supplier Code of Conduct

Preamble

Strattec Security Corporation hereinafter jointly referred to as Strattec strives to achieve growth based on a socially responsible conduct in all spheres in which they pursue their business activities and in all countries in which they operate.

Strattec expect its suppliers to support its effort by observing basic ethical principles and statutory provisions and by their responsible approach to their production processes. It is in this context that Strattec has developed this Supplier Code of Conduct and requires its supplier to comply with it.

General Principles, Laws and Statutes

The supplier commits to upholding its social responsibility in all business dealings. In all its business activities and decisions, the supplier shall respect the laws in effect and any other applicable provisions in the countries where it is active.

Prohibition of Corruption and Bribery

The supplier assures not to practice or tolerate any form of corruption, extortion or embezzlement. Unethical behavior may not be used to unlawfully influence others in business dealings by exchanging gifts or offering or granting other benefits either at home or abroad. The same applies to the unlawful acceptance of benefits.

Human Rights / Child Labor / Forced Labor / Working conditions / Discrimination

The supplier respects and supports compliance with the internationally recognized human rights and ensures not to participate in human rights violations.

Child labor as defined by the ILO conventions (International Labor Organization) as well as national provisions is prohibited and any form of exploitation of children and adolescents will not be tolerated. The supplier assures that the production and / or processing of the supplied goods is being carried out without exploitative child labor defined in the ILO conventions.

Any form of forced or compulsory labor including involuntary prison labor will be refrained from by the supplier.

Working hours are set according to the current laws, the industry standards or the applicable ILO conventions. Overtime shall be voluntary and employees are entitled to reasonable periods of rest and leave for illness and emergencies. Compensation and social benefits have to be granted in accordance with the basic principles of minimum wages, overtime and the statutory social security systems.

Health, Safety and Environmental Protection



In order to act in harmony with the environment and to avoid hazards to humans and the environment, the supplier observes all applicable health, employment and environment related laws and other specifications.

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Prohibited substances and materials

All the supplies, products or parts bought from the supplier by Strattec, whether they are standard or specifically developed by the supplier for the company, must not contain any product, material or substance prohibited by the legislations or regulations applicable in the supplier’s countries, the European Union and more generally, in all of the countries in which these supplies, products or parts are marketed and used. If applicable to the goods delivered to Strattec the supplier also complies with its obligations concerning the area of, conflict minerals.

Adherence to Antitrust law

The supplier will conduct its business in compliance with the principles of fair competition and in accordance with all applicable antitrust laws.

Comply with Trade Restrictions & Controls

You agree to comply with the applicable legal licensing requirements and restrictions on exports and trade dealings, including bans on exports to a prohibited country, bans on imports from, or dealings in property originating in a sanctioned country or financial transactions and dealings involving a sanctioned country or designated individuals and entities. In addition, you agree to comply with regulations that may apply to your business regarding the exploitation and trade of conflict minerals originating in the Democratic Republic of the Congo and adjoining countries.

Freedom of Association

The supplier respects the rights of employees to associate freely. Employees should be able to communicate openly with management regarding working conditions without threat of reprisal, intimidation or harassment.

Confirmation of the Strattec Supplier Code of Conduct

We acknowledge receipt of the Strattec Supplier Code of Conduct and confirm the compliance with the contents for all deliveries and services for the Strattec Company. We undertake to require our own suppliers to comply with the provisions pursuant to this Code of Conduct. We are perfectly aware that Strattec will consider any major infringement of the above obligations by us as a breach of contract and that Strattec will reserve the right to take appropriate measures.

_____	_____	_____
Date	Representative Name	Title
_____	_____	_____
Supplier Company Name	Representative Signature	

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DOCUMENT REVISION LOG

Revisions level may not contain the letters I, O, Q, S or Z.			
Rev.	Date	Section(s)	Description
-	03/12/19	N/A	Initial Release into VKMS
A			
B			
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