



Supplier Code of Conduct

Environmental, Social & Governance (ESG) and Health & Safety Requirements for Suppliers

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1. Introduction & Purpose

Uni Abex (“Uni Abex,” “the Company,” “we,” or “our”) is committed to conducting business responsibly and to working only with suppliers, vendors, contractors, and subcontractors (collectively “Suppliers”) who share that commitment. This Supplier Code of Conduct (“the Code”) sets out the minimum Environmental, Social, Governance (ESG), and Health & Safety (H&S) standards that all Suppliers operating in, or supplying to, our foundry and fabrication supply chain must meet.

Foundry and fabrication operations — including melting, casting, molding, forging, welding, cutting, grinding, machining, and surface treatment — present distinct environmental and occupational hazards, from molten metal handling and furnace emissions to noise, heat stress, and heavy manual handling. This Code has been developed specifically to address these industry realities, in addition to the universal labor, ethics, and environmental expectations applicable across our supply chain.

This Code does not replace but supplements applicable laws, regulations, industry standards, and any specific contractual terms agreed between Uni Abex and the Supplier. Where this Code sets a higher standard than local law, the higher standard shall apply, unless doing so would require the Supplier to violate local law.

2. Scope & Applicability

This Code applies to all Suppliers providing goods, materials, equipment, or services to Uni Abex, including but not limited to:

- Raw material suppliers (pig iron, scrap metal, alloys, resins, binders, refractories, sand, coke, and other foundry inputs);
- Pattern-making, tooling, and die suppliers;
- Casting, forging, and fabrication subcontractors;
- Surface treatment, heat treatment, and finishing service providers (shot-blasting, painting, electroplating, galvanizing);
- Logistics, warehousing, and transportation providers; and
- Any subcontractor or labor agency engaged by a Supplier to fulfil an obligation to Uni Abex.

Suppliers are required to cascade the principles of this Code to their own supply chains, including subcontractors and labor providers, and remain accountable for the compliance of those parties to the extent they act on the Supplier's behalf.

3. Environmental Standards

Foundry and fabrication processes are resource- and emissions-intensive. Suppliers must operate in a manner that minimizes environmental impact, complies with all applicable environmental law, and continuously works toward improved environmental performance.

3.1 Environmental Management & Legal Compliance

- Maintain all environmental permits, licenses, and consents required for melting, casting, molding, welding, surface treatment, and waste-handling operations, and keep them current and available for inspection.
- Implement a documented environmental management system (an ISO 14001-aligned system is strongly encouraged) proportionate to the scale and risk of operations.
- Designate accountable personnel for environmental compliance and maintain records of monitoring, incidents, and corrective actions.

3.2 Air Emissions & Dust Control

- Install and maintain effective emission-control equipment (baghouses, scrubbers, cyclones, fume extraction) on melting furnaces, cupolas, induction furnaces, sand-handling systems, shot-blasting booths, and welding/grinding stations.
- Monitor and control particulate matter, metal fumes (including lead, cadmium, chromium, manganese, and nickel compounds where relevant), volatile organic compounds (VOCs) from resins and coatings, and combustion gases, in line with applicable emission limits.
- Prevent fugitive dust from sand reclamation, shakeout, and shot-blasting operations from escaping into surrounding communities.

3.3 Energy Use & Greenhouse Gas Management

- Track energy consumption by process (melting, holding, heat treatment, compressed air, ventilation) and pursue energy-efficiency measures, given the high energy intensity of melting and holding furnaces.
- Where feasible, disclose Scope 1 and Scope 2 greenhouse gas emissions to Uni Abex upon request and support the Company's supply-chain decarbonization objectives.

3.4 Water Management

- Manage water used in quenching, cooling, scrubbing, and cleaning operations responsibly; minimize withdrawal and maximize recirculation where practicable.
- Treat process effluent (including quench water, scrubber blowdown, and plating/finishing rinse water) to applicable discharge standards before release, and never discharge untreated wastewater to soil, drains, or waterways.

3.5 Waste & By-Product Management

- Manage foundry sand, slag, dross, refractory waste, and scale in accordance with applicable waste regulations; pursue reuse, reclamation, or recycling of spent sand and metal by-products ahead of landfill disposal.
- Classify, store, label, and dispose of hazardous wastes (spent abrasives, oils, solvents, plating sludge, baghouse dust) only through licensed waste handlers, and retain manifests/records of disposal.
- Segregate scrap metal for recycling and avoid open burning of waste materials.

3.6 Chemicals & Hazardous Substances

- Maintain an inventory and Safety Data Sheets (SDS) for all chemicals used, including binders, resins, mold-release agents, fluxes, degreasers, and coatings.

- Comply with restrictions on substances of concern (e.g., heavy metals, asbestos-containing materials, ozone-depleting substances, and any restricted substances specified in customer material specifications).
- Store and handle chemicals in designated, bunded, and properly ventilated areas with appropriate spill-containment measures.

3.7 Resource Efficiency & Circularity

- Favor recycled or secondary metal inputs where quality and specification permit.
- Design processes to reduce scrap generation, rework, and material loss.

Suppliers engaged in high-risk processes (cupola/induction melting, plating, or solvent-based coating) may be asked to provide emissions monitoring data, effluent test results, or waste-manifest records as part of ongoing due diligence.

4. Social Standards

4.1 Human Rights & Labor Practices

- No child labor: Suppliers shall not employ any person below the applicable legal minimum working age, and in no case below 15 years (or 14 where permitted under ILO Convention 138 exceptions), and shall implement age-verification procedures.
- No forced, bonded, or involuntary labor, including debt bondage, indentured labor, or human trafficking in any form; Suppliers shall not withhold identity documents or charge recruitment fees to workers.
- Freedom of association: workers' rights to freely associate, organize, and bargain collectively shall be respected, in accordance with applicable law.
- Non-discrimination: no discrimination in hiring, compensation, training, promotion, or termination on the basis of race, caste, religion, gender, age, disability, marital status, sexual orientation, union membership, or political opinion.
- Humane treatment: no harsh or inhumane treatment, including harassment, verbal or physical abuse, or threats of such treatment.

4.2 Wages, Benefits & Working Hours

- Wages and benefits paid shall meet or exceed the applicable legal minimum and comply with all legally mandated benefits.
- Overtime shall be voluntary where possible, compensated at the legally required premium rate, and working hours shall comply with applicable law, generally not exceeding 60 hours per week including overtime, with at least one rest day in seven.
- Wages and hours shall be clearly documented, with workers provided timely and understandable wage statements.

4.3 Diversity, Equity & Community

- Suppliers are encouraged to promote diverse and inclusive workplaces, particularly given the traditionally male-dominated demographics of foundry and heavy-fabrication trades.
- Suppliers should engage constructively with surrounding communities and address legitimate community concerns relating to noise, dust, traffic, or emissions from operations.

4.4 Migrant & Contract Labor

- Where migrant or contract labor (common in foundry and fabrication operations) is engaged, Suppliers must ensure equal treatment, fair recruitment practices, and full compliance with this Code for all such workers, whether employed directly or through labor agencies.

5. Occupational Health & Safety Standards

Foundry and fabrication activities involve some of the highest-severity occupational hazards in manufacturing, including molten-metal burns, furnace explosions, silicosis, noise-induced hearing loss, and traumatic injury from heavy equipment. Suppliers must implement robust, proactive H&S management appropriate to these risks.

5.1 Health & Safety Management System

- Maintain a documented H&S management system (an ISO 45001-aligned system is strongly encouraged), with a named responsible manager, risk assessments for all processes, and a program of internal audits.
- Conduct and document job-specific risk assessments for melting, pouring, molding, shakeout, fettling, welding, cutting, grinding, and material handling activities before work begins and after any process change.

5.2 Foundry-Specific Hazard Controls

- Molten metal handling:
 - Ladles, launders, and pouring equipment shall be maintained, pre-heated/dried to prevent moisture-induced explosions, and operated only by trained personnel.
 - Exclusion zones shall be maintained around pouring and casting areas; moisture must be controlled in molds, sand, and tools to prevent steam explosions.
- Furnace operations: cupolas, induction, and electric arc furnaces shall have interlocks, over-temperature protection, and emergency shutdown procedures; charge materials shall be inspected to exclude sealed containers or explosive contaminants.
- Sand and dust exposure: engineering controls (local exhaust ventilation, wet suppression) and respiratory protection shall be provided to control exposure to respirable crystalline silica and prevent silicosis.
- Shot-blasting and fettling: enclosed or well-ventilated booths, hearing and respiratory protection, and machine guarding shall be provided for grinding, chipping, and fettling operations.

5.3 Fabrication-Specific Hazard Controls

- Welding & cutting: fume extraction at source, eye/face protection appropriate to the process (arc welding, plasma, oxy-fuel), fire watches for hot work, and permit-to-work systems for confined spaces or elevated work.
- Machine guarding: all presses, shears, rolls, saws, and CNC machinery shall have appropriate guarding, interlocks, emergency stops, and lock-out/tag-out (LOTO) procedures for maintenance.
- Material handling: cranes, hoists, and lifting equipment shall be inspected, load-rated, and operated only by certified personnel; safe rigging practices shall be enforced for heavy castings and steel sections.
- Confined space entry: permit-based entry procedures, atmospheric testing, and rescue provisions for pits, tanks, and enclosed furnace areas.

5.4 Physical Hazards: Heat, Noise & Vibration

- Implement heat-stress management (hydration, rest breaks, acclimatization, cooling stations) for workers exposed to radiant heat from furnaces and casting operations.
- Conduct noise monitoring and provide hearing protection and hearing-conservation programs in high-noise areas (shot-blasting, grinding, fettling, forging).

- Control exposure to hand-arm and whole-body vibration from grinding tools, chipping hammers, and heavy machinery.

5.5 Personal Protective Equipment (PPE)

- Provide, at no cost to workers, PPE appropriate to task-specific hazards, including heat-resistant clothing, face shields, safety footwear with metatarsal protection, respiratory protection, hearing protection, and cut-resistant gloves.
- Ensure PPE is properly fitted, maintained, and that workers are trained in its correct use and limitations.

5.6 Training, Emergency Preparedness & Incident Management

- Provide role-specific safety induction and ongoing training, including for molten-metal handling, hot work, confined-space entry, and lifting operations, before workers are permitted to perform these tasks unsupervised.
- Maintain emergency response plans covering fire, molten-metal spills/explosions, chemical spills, and medical emergencies, with trained first-aiders and accessible emergency equipment (fire suppression, eyewash stations, spill kits).
- Investigate all incidents, near-misses, and occupational illnesses; maintain injury/illness records (e.g., Lost Time Injury Frequency Rate) and implement corrective actions.
- Report fatalities, serious injuries, and major process incidents (fire, explosion, significant chemical release) to Uni Abex within 24 hours of occurrence.

5.7 Workplace Conditions

- Provide adequate lighting, ventilation, sanitation facilities, and clean drinking water at all work locations, including for any worker housing provided or arranged by the Supplier.

6. Governance & Business Ethics

6.1 Anti-Corruption & Anti-Bribery

- Suppliers shall not offer, promise, give, request, or accept any bribe, kickback, or other improper payment or benefit to or from any person, including government officials, to obtain or retain business or any improper advantage.
- Gifts, entertainment, and hospitality offered to Uni Abex personnel shall be modest, infrequent, and compliant with Uni Abex's gift and entertainment policy upon request.

6.2 Fair Dealing & Competition

- Suppliers shall compete fairly and comply with applicable antitrust and competition laws, and shall not engage in bid-rigging, price-fixing, or market allocation.
- Suppliers shall accurately represent their products, certifications, capabilities, and pricing to Uni Abex.

6.3 Conflicts of Interest

- Suppliers shall disclose to Uni Abex any actual or potential conflict of interest, including relationships between Supplier personnel and Uni Abex employees involved in procurement decisions.

6.4 Confidentiality, Data Protection & Intellectual Property

- Suppliers shall protect Uni Abex's confidential information, drawings, specifications, and intellectual property, and use them solely for the purpose of fulfilling the Supplier's obligations.
- Suppliers shall implement reasonable safeguards to protect any personal data processed on behalf of Uni Abex in accordance with applicable data protection law.

6.5 Whistleblower Protection & Non-Retaliation

- Suppliers shall provide workers with a means to raise grievances or report concerns (including anonymously, where feasible) without fear of retaliation, dismissal, or discrimination.
- Uni Abex maintains its own confidential reporting channel (see Section 8) through which Supplier workers and stakeholders may also raise concerns directly.

6.6 Responsible Sourcing & Conflict Minerals

- Suppliers using tin, tantalum, tungsten, gold, or cobalt in alloys, solders, or components shall exercise due diligence in accordance with the OECD Due Diligence Guidance and shall not knowingly source such minerals from conflict-affected or high-risk areas in a manner that contributes to human rights abuses.
- Suppliers shall provide conflict-minerals declarations to Uni Abex upon request.

7. Compliance Monitoring, Audits & Corrective Action

Uni Abex verifies Supplier compliance with this Code through a combination of self-assessment, documentation review, and on-site audit, proportionate to the risk profile of the Supplier's operations.

7.1 Self-Assessment

- Suppliers shall complete a Uni Abex ESG & H&S self-assessment questionnaire prior to onboarding and periodically thereafter (at least annually for high-risk processes such as melting, casting, and surface treatment).
- Suppliers shall promptly notify Uni Abex of any material change in ownership, location, process, or compliance status that may affect their risk profile.

7.2 Right to Audit

- Uni Abex, or a third party appointed on its behalf, reserves the right to conduct announced or unannounced audits of Supplier facilities, records, and management systems relevant to this Code.
- Suppliers shall provide reasonable access to facilities, relevant documentation, and worker interviews (conducted confidentially where required) to support audit activities.

7.3 Corrective Action

- Where non-conformances are identified, the Supplier shall develop and implement a Corrective Action Plan (CAP) with defined timelines, agreed with Uni Abex, addressing root causes rather than symptoms alone.
- Uni Abex will support Suppliers, where appropriate, through capability-building and follow-up verification of corrective actions.

7.4 Non-Compliance & Escalation

- Minor or first-time non-conformances will generally be addressed through a CAP with an agreed remediation period.
- Zero-tolerance violations — including child labor, forced labor, imminent life-threatening safety hazards left unremediated, or serious environmental non-compliance — may result in immediate suspension of orders and, where remediation is not achieved within the agreed timeframe, termination of the business relationship.
- Repeated or unresolved non-conformances may result in removal from Uni Abex's Approved Supplier List.

Table 1 — Risk-Based Monitoring Tiers

Risk Tier	Typical Process / Activity	Minimum Assessment Frequency
High	Melting/casting, electroplating, solvent-based coating, chemical formulation	Annual on-site audit + annual self-assessment
Medium	Fabrication, welding, machining, heat treatment, finishing	Self-assessment annually; audit every 2 years or risk-triggered
Standard	Logistics, packaging, indirect materials, office-based services	Self-assessment every 2 years

8. Reporting Concerns & Grievance Mechanism

Uni Abex encourages Suppliers, their workers, and other stakeholders to report suspected violations of this Code in good faith. Reports may be made through:

- A Supplier's own designated point of contact within Uni Abex Procurement; or
- Uni Abex's confidential Ethics & Compliance reporting channel, details of which are provided in the Supplier onboarding pack and posted at Supplier facilities where required.

All reports will be treated confidentially to the extent possible and investigated promptly. Uni Abex strictly prohibits retaliation against any individual who raises a concern in good faith.

9. Acknowledgment

By signing below, or by continuing to supply goods or services to Uni Abex, the Supplier confirms that it has read, understood, and agrees to comply with this Supplier Code of Conduct, and to cascade its principles to relevant subcontractors and labor providers within its control.

Supplier / Company Name:	
Authorized Signatory (Name & Title):	
Signature:	
Date:	

Document Control

Version 1.0 — Effective 22 July 2025 — Owner: Group Procurement & Sustainability, Uni Abex. This Code is subject to periodic review and update; Suppliers will be notified of material revisions.

	
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