



**ACCURIDE™**

MOVING THE WORLD



# Our Commitment to Ethical Partnership

At Accuride, our success is built upon a foundation of strong ethical principles, responsible business practices, and unwavering commitment to social responsibility and sustainability. As we extend our hand in collaboration to suppliers and partners around the world, we do so with a shared purpose: to uphold the highest standards of integrity, respect, and accountability.

This Supplier Code of Conduct is a reflection of our values, aspirations, and dedication to making a positive impact on the global community. Through this document, we outline the fundamental expectations we have for our suppliers – expectations that mirror our own commitment to ethical conduct, environmental stewardship, and the well-being of all individuals involved in our supply chain.

As we embark on this journey together, we emphasize the importance of our collective efforts in driving meaningful change.





Our Code of Conduct is more than just a set of guidelines, it is a policy that AccuSUSTAIN 2039 Roadmap is committed to creating a sustainable future, promoting fair labor practices, preserving our planet and upholding the highest standards of business ethics. Our suppliers are key partners in achieving these shared goals, and we look forward to working together based on trust, transparency and a mutual commitment to excellence. By adhering to the principles set out in this Code of Conduct, together we can contribute to a world in which economic success is harmoniously combined with social progress and environmental protection.

**Thank you for joining us on this journey towards a greener, more responsible and resource-efficient future.**

With the publication of this Code of Conduct, it comes into force for all suppliers.



# Our General Requirements and Requirements for our Supply Partners

Accuride is dedicated to upholding the highest ethical standards in all aspects of our business operations. This commitment extends to our supply chain, where we work collaboratively with our supply partners to ensure that our shared values of integrity, responsibility, and sustainability are upheld. This Supplier Code of Conduct outlines the expectations we have for both ourselves and our supply partners to maintain legal compliance, engage in due diligence, implement effective management systems, and drive continuous improvement.



## Legal Compliance

We are committed to conducting business in full compliance with all applicable laws, regulations, and standards. This includes local, national, and international laws that pertain to labor practices, environmental protection, product safety, and more. We expect our supply partners to demonstrate the same commitment by adhering to all relevant legal requirements in their operations.

## Due Diligence

Understanding the potential impacts of our actions and decisions is paramount to our commitment to ethical conduct. We undertake thorough due diligence processes to identify and mitigate any risks associated with our business activities. We expect our supply partners to engage in a similar due diligence process, assessing potential risks and taking proactive measures to prevent or address them.





# ACCURIDE™

MOVING THE WORLD

## Management Systems

Effective management systems are crucial for maintaining accountability, transparency, and the ability to drive positive change. We have established robust management systems to ensure that our ethical and environmental standards are met. We encourage our supply partners to implement their own management systems that align with our shared values, enabling them to effectively manage compliance, risks, and opportunities.

## Continuous Improvement

We are dedicated to continuous improvement in all aspects of our business. This includes not only enhancing our products and services but also advancing our ethical, social, and environmental performance. We expect our supply partners to adopt a similar mindset, consistently seeking opportunities to enhance their operations, minimize negative impacts, and contribute positively to society and the environment.





**By adhering to this Supplier Code of Conduct, we collectively commit to fostering a responsible, sustainable, and ethical business environment. We recognize that our success is intertwined with the success of our supply partners, and together, we can create a brighter future for our stakeholders, communities, and the world at large.**





## The Four Pillars of Sustainability

1. *People, Conditions, and Safety*
2. Environment and Resources
3. Climate and AccuSUSTAIN 2039 Roadmap
4. Business Ethic and Data Safety

## People, Conditions, and Safety

At Accuride, we hold the well-being of people, the quality of working conditions, and the highest standards of safety in the highest regard. These topics are integral to our core values and are non-negotiable aspects of our operations. The success of our business is inseparable from the welfare of our employees, partners, and the communities we engage with. We support, among other things, the United Nations ("UN") Declaration on Human Rights and the Declaration the International Labor Organization (ILO) Declaration on Fundamental Principles and Rights at Work.







## Children's Rights

At Accuride, we steadfastly uphold the rights and well-being of children as a foundational principle within our operations and supply chain. We categorically reject child labor in all forms and are dedicated to supporting access to education and nurturing environments that enable the healthy development of children. Our supply partners are expected to share this commitment, ensuring that their practices align with international labor standards that protect children from exploitation and harm.

## Wages and Benefits

We believe in fair compensation as a cornerstone of ethical business. Our commitment to providing fair wages and benefits extends to our supply partners. Workers should receive compensation that meets or exceeds legal minimums, enabling them to maintain a decent standard of living for themselves and their families. We encourage our partners to foster environments where workers are treated with dignity and fairly rewarded for their contributions.



## What is Modern Slavery?

Modern slavery refers to the practice of exploiting individuals through various forms of forced labor, human trafficking, debt bondage, and other coercive tactics. It is a grave violation of human rights, where individuals are subjected to labor against their will, often under deplorable conditions and with little or no remuneration.



## Modern Slavery and Forced Labor

We vehemently oppose modern slavery and forced labor. Our supply chain is dedicated to remaining free from such practices. We demand that our supply partners share in this stance, ensuring that every individual engaged in the production of goods and services is treated with respect and works in conditions that are voluntary, safe, and humane.

## How do we deal with modern slavery at Accuride?

*We have a zero tolerance policy regarding modern slavery and forced labor.*





## **Non-Discrimination and Fair Treatment**

Diversity and inclusion are integral to our identity. Discrimination based on race, gender, religion, age, or any other protected characteristic has no place within our business practices. We implore our supply partners to adopt a similar commitment, fostering environments where all individuals are treated fairly, with respect and dignity.

## **Freedom of Association and Collective Bargaining**

Worker rights, including the freedom to form associations and engage in collective bargaining, are sacrosanct. We respect these rights within our own workforce and extend this respect to our supply partners. Our suppliers are expected to allow their employees to freely associate, collectively bargain, and voice their concerns without fear of reprisal.



## **Diversity, Equity, and Inclusion**

Accuride recognizes that the strength of our business lies in the diversity of our workforce and partners. Our commitment to diversity, equity, and inclusion is unwavering. We value and respect the unique perspectives, backgrounds, and identities that every individual brings to the table. We expect our supply partners to share in this commitment, fostering inclusive environments that celebrate differences and promote equality.



### **What is the meaning of Diversity, Equity, and Inclusion?**

Diversity, Equity, and Inclusion (DEI) form the pillars of a transformative movement dedicated to reshaping our societies and workplaces into spaces that embrace everyone, irrespective of their backgrounds or identities.



## Working Hours and Leave

A healthy work-life balance is crucial to the well-being of workers. At Accuride, we uphold reasonable working hours and the provision of adequate leave, allowing individuals to maintain their personal lives and responsibilities. We encourage our supply partners to ensure that their employees are not subjected to excessive working hours and have access to appropriate leave benefits.

## Emergency Preparedness

Preparedness for emergencies is integral to our commitment to worker safety and well-being. We have comprehensive emergency response plans in place to safeguard our employees. We expect our supply partners to establish similar protocols, ensuring that their workers are trained and equipped to respond effectively to emergencies, prioritizing their safety above all.

## What is Emergency Preparedness?

Emergency preparedness refers to the proactive planning, organizing, and readiness measures taken by individuals, organizations, and communities to effectively respond to and manage various types of emergencies, disasters, or crises. It involves developing strategies, protocols, and resources to mitigate potential risks, ensure the safety of people and assets, and facilitate a swift and coordinated response in times of unexpected events.



## Rights of Minorities and Indigenous Peoples

Our commitment to ethical and responsible business practices extends to the fundamental principles of respecting the rights and cultures of minorities and indigenous peoples. This commitment is not just a policy; it's an integral part of our corporate identity and a reflection of our core values.

We firmly believe in the importance of upholding the rights and dignity of all individuals, irrespective of their ethnic, cultural, or indigenous background. This principle extends throughout our entire supply chain. We expect our supply partners to share and uphold these values. By fostering an environment of respect, inclusivity, and cultural sensitivity, we aim to not only meet our ethical obligations but also to set a higher standard for social responsibility in our industry. We believe that by respecting the rights and cultures of minorities and indigenous peoples, we contribute to a more harmonious and equitable world where every individual is empowered to thrive.



The concept of "Rights of Minorities and Indigenous Peoples" refers to the fundamental principles and protections that are designed to ensure the rights, dignity, and well-being of groups within a society that might be smaller in number or have distinct cultural, ethnic, or historical characteristics. Minorities can include groups based on factors such as ethnicity, religion, language, or other shared characteristics that set them apart from the majority population. Indigenous peoples, on the other hand, are often the original inhabitants of a particular region or territory, with their own unique cultural practices, traditions, and ways of life.

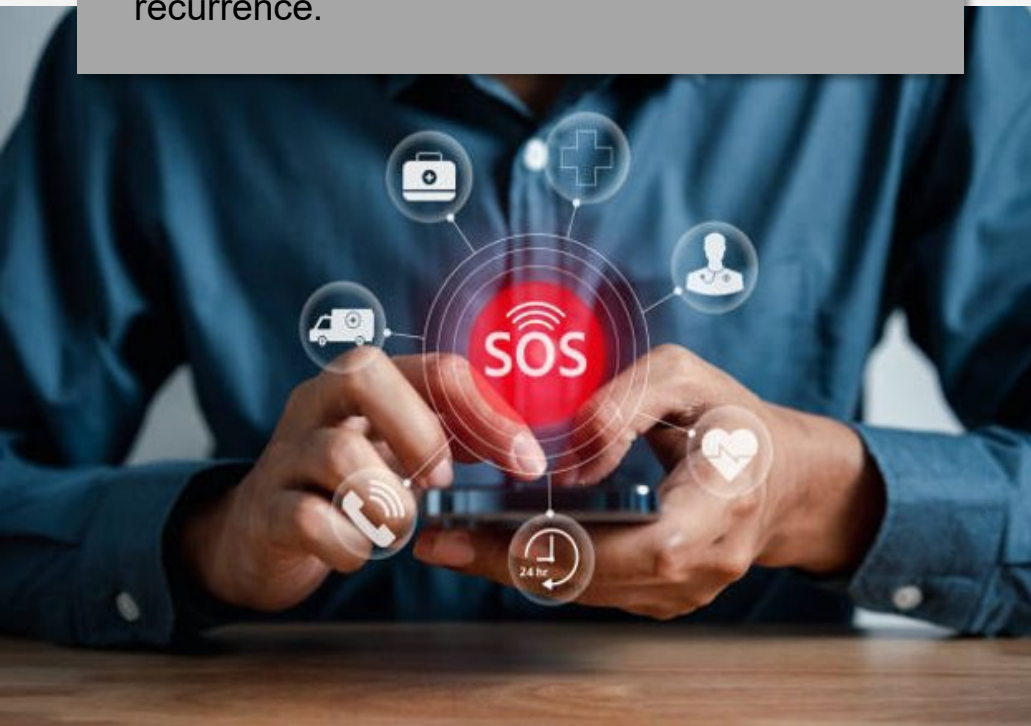


## What is Incident and Accident Management?

Incident and accident management involves the systematic approach of identifying, assessing, responding to, and mitigating unexpected events and incidents within an organization. Incidents can range from minor disruptions to serious accidents that pose risks to people, property, and operations. The primary goal of incident and accident management is to ensure the safety of individuals, minimize disruptions, and prevent recurrence.

## Incident and Accident Management

In the unfortunate event of incidents or accidents, the ability to respond swiftly and effectively is paramount. At Accuride, we have instituted robust procedures to manage and report such incidents, with an unwavering commitment to safeguarding the health and safety of all those affected. We understand that proactive incident and accident management is not only a legal obligation but a moral responsibility. Our commitment to incident and accident management reflects our core values of responsibility, accountability, and empathy. We understand that incidents and accidents can have a profound impact on individuals and communities, and we are resolute in our dedication to minimizing these impacts to the greatest extent possible and we expect our suppliers to do the same.



## Ethical recruiting

Suppliers must adhere to ethical recruiting practices, ensuring fairness, transparency, and respect for all individuals. Recruiting processes must be free from discrimination based on race, gender, age, religion, nationality, disability, or any other protected characteristic. All candidates must be treated with dignity and respect throughout the recruitment process, ensuring equal opportunities for all. Job descriptions, requirements, and terms of employment must be clearly communicated to all candidates. Suppliers must not engage in or support any form of forced, bonded, or involuntary labor, and recruitment fees must not be charged to workers. Additionally, all recruiting practices must comply with applicable local and international labor laws and standards. By following these principles, suppliers contribute to a fair and ethical work environment.





## Expectation from our Suppliers:

Accuride holds the highest standards of ethical conduct and responsibility. These principles apply to our internal operations and extend to our relationships with suppliers. We believe that promoting fair treatment, excellent working conditions, and uncompromising safety measures within our supply chain is not just a choice, but a fundamental obligation. As such, we outline our clear expectations for suppliers in terms of people, working conditions, and safety.

### 1. Respect for People:

We expect our suppliers to treat all individuals involved in their operations with respect, dignity, and fairness. This includes their employees, contractors, and any other stakeholders. Discrimination, harassment, child labor, forced labor, and any form of abuse or exploitation will not be tolerated under any circumstances.

### 2. Fair Working Conditions:

Suppliers are required to provide a safe, clean, and healthy working environment for all employees. Adequate facilities, including clean restrooms, proper ventilation, and suitable accommodations, must be available. Working hours, wages, and benefits should meet or exceed legal standards and industry norms.



### 3. Labor Laws and Regulations:

All suppliers must comply with local and international labor laws and regulations. This includes adhering to minimum wage laws, working hour restrictions, and providing legally mandated benefits. We expect our suppliers to keep comprehensive records of employment and make them available for audit when necessary.

### 4. Health and Safety Measures:

Safety is paramount in all aspects of our operations. Suppliers must implement and maintain rigorous health and safety measures to prevent accidents, injuries, and exposure to harmful substances. Regular training programs and safety protocols should be in place to ensure that employees are well-prepared to handle any situations that may arise.





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## Environment and Resources

Accuride—our commitment to excellence extends beyond business operations. It extends to our profound responsibility to the environment and the conscientious management of valuable resources. We understand that the choices and actions we make today have far-reaching implications for the world we pass on to future generations. Armed with this awareness, we have embraced the role of environmental stewards and diligent custodians of our planet's finite resources. Our commitment to the environment and resource management is more than a corporate responsibility; it is a moral imperative. By embracing this responsibility, we aim to be leaders in our industry, setting the standard for sustainable and responsible business practices.





## Conflict Minerals

In alignment with our unwavering commitment to ethical and responsible business practices, we proudly affirm that our company is resolute in its stance against the use of conflict minerals – specifically tin, tantalum, tungsten, and gold – within our operations. These minerals, often sourced from regions associated with human rights violations and environmental degradation, do not find a place in our supply chain.

Our dedication to transparency and social responsibility drives us to diligently trace the origin of our materials, ensuring that they are sourced from conflict-free regions and do not contribute to the funding of armed conflicts or human rights abuses. By conscientiously opting out of these minerals, we are taking a stand against the perpetuation of harm and actively contributing to the betterment of communities and the preservation of our planet.

Our commitment to a conflict-free supply chain reflects our larger mission to foster positive change, uphold human rights, and champion sustainability. We believe that ethical choices not only define our company's identity but also influence the greater landscape of responsible business practices.





## **Why Responsible Sourcing of Minerals and Materials Matters:**

Ethical sourcing of minerals and materials is of great significance due to its profound impact on people, the environment, and communities. By ensuring that the procurement of our raw materials is ethically responsible. Overall, ethical sourcing of minerals and materials contributes to creating a fairer, environmentally friendly, and more sustainable world where all stakeholders benefit in the long run.

## **Responsible Sourcing of Minerals and Materials**

At Accuride, our commitment to responsible sourcing is unwavering. We prioritize the ethical acquisition of minerals and materials that go into our products. We are dedicated to ensuring that the sourcing process upholds human rights, minimizes environmental impact, and supports the well-being of communities. We expect our supply partners to share in this commitment, adhering to the same principles of responsible sourcing and transparency.



# Circular Economy and Responsible Waste Management

We champion the principles of a circular economy and responsible waste management. We are committed to minimizing waste, maximizing resource efficiency, and creating a sustainable loop where materials are repurposed and reused. We expect our supply partners to share in this commitment, embracing practices that contribute to a greener and more responsible future. We encourage our suppliers, just as we do, to adhere to the following principles:

1. Prevention
2. Reduction
3. Reuse
4. Recycling
5. Energy recovery
6. Thermal disposal without energy recovery
7. Landfilling in a safe and environmentally sound manner



## What is Waste Management?

Waste management is the organized process of collecting, transporting, treating, and disposing of various types of waste materials in a responsible and environmentally sustainable manner.





# Land, Forest, and Water Rights, Forced Eviction Policy

Suppliers must respect and uphold the land, forest, and water rights of local and indigenous communities. This includes:

## **Land Rights:**

Ensuring that all land acquisitions and usage are conducted legally, ethically, and with the free, prior, and informed consent of affected communities.

## **Forest Rights:**

Protecting forest ecosystems by preventing deforestation and degradation, and promoting sustainable forest management practices.

## **Water Rights:**

Guaranteeing access to clean and safe water for all communities, avoiding pollution, and ensuring sustainable water management.

## **Forced Eviction:**

Prohibiting any form of forced eviction and displacement of communities. Suppliers must engage in fair and transparent negotiations, providing adequate compensation and resettlement support when necessary.

By adhering to these principles, suppliers contribute to the sustainable and ethical management of natural resources and the protection of human rights.



**Accuride is proud to be a member of Circular Valley and to help shape the future of the circular economy.**



**Circular Valley**

<https://circular-valley.org/>

## **About Circular Valley**

Circular Valley® was launched by industry, science, politics and society as an international hotspot of the Circular Economy. It is funded by the North-Rhine-Westphalian Ministry of Economy to leverage and further develop the unique strengths of the region by trendsetting, innovative Circular Economy concepts, products and business models.

### **THE SILICON VALLEY OF THE CIRCULAR ECONOMY**

1. Region with global leaders from all industries
2. Established and new 'Circular' companies
3. Leading scientific institutions in 'Circular'
4. Cosmopolitan European metropolis
5. Birthplace of the industrial revolution.



# Nurturing Sustainable Water Management

## Our Approach:

### Efficient Consumption:

We prioritize water-efficient practices within our operations, aiming to minimize consumption and reduce our water footprint.

### Pollution Prevention:

We uphold strict guidelines to prevent water pollution, emphasizing the responsible disposal of waste and hazardous substances.

### Ecosystem Protection:

We are committed to safeguarding aquatic ecosystems by adhering to water conservation measures that minimize our impact on local habitats.

### Stakeholder Engagement:

We actively engage with stakeholders to foster awareness and collaboration in promoting water conservation efforts.

At Accuride, the importance of responsible water management is reflected in our values. We understand that water is a limited resource essential for life and ecosystems. Our commitment to minimizing water waste, preventing contamination, and safeguarding aquatic environments is unwavering. We extend this commitment to our supply partners and invite them to collaborate with us in ensuring the responsible and sustainable use of water resources. This is why we also have an Environmental Management system according to ISO 14001 in place.





## Soil quality

Suppliers must implement practices that protect soil quality. This includes adopting sustainable land management techniques to prevent soil degradation and contamination. By maintaining healthy soil, suppliers contribute to environmental sustainability and the long-term productivity of the land.



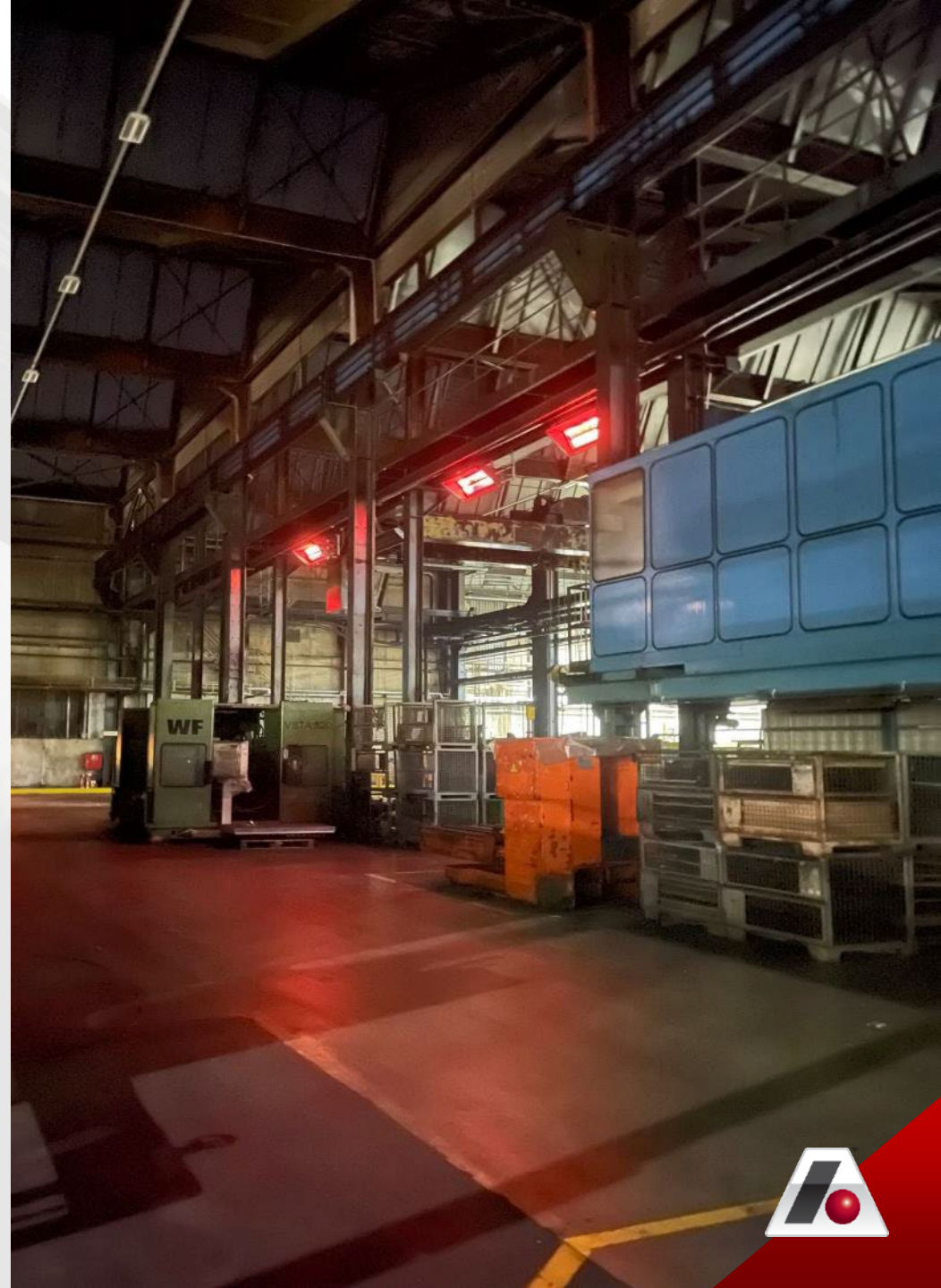
## Noise Emissions

Suppliers should monitor and control noise levels to ensure they do not exceed local regulations and do not negatively impact surrounding communities. Effective noise management practices help protect the well-being of local populations and contribute to a more harmonious environment.



# Responsible Chemical Management

In today's interconnected and environmentally conscious world, responsible chemical management has emerged as a critical pillar of sustainable business practices. It encompasses a comprehensive approach to handling, using, and disposing of chemicals in a manner that prioritizes safety, environmental protection, and human health. At our organization, we understand that the responsible management of chemicals is not merely a regulatory requirement but a moral and ethical obligation. It is a commitment to the well-being of our employees, customers, communities, and the broader environment.





## Supplier Expectations for Environment and Resources

Accuride considers ourselves as more than a business entity, we consider ourselves stewards of the environment and champions of sustainable practices. We are resolute in our commitment to conducting our operations in a manner that respects and preserves the delicate balance of our planet for current and future generations. As we embark on this journey towards a greener future, we extend these deeply ingrained commitments to you, our valued suppliers. We are acutely aware that the global challenges of environmental degradation and resource depletion require collaborative action from every facet of our society. Every touchpoint within the supply chain carries immense significance in collectively shaping a world that thrives sustainably. Thus, with unwavering conviction, we articulate our expectations for our suppliers in terms of environmental responsibility and resource management, which are integral components of our shared vision. Let's do this together and follow the above points:

- **Conflict Minerals**
- **Responsible Sourcing of Minerals and Materials**
- **Circular Economy and Responsible Waste Management**
- **Nurturing Sustainable Water Management**
- **Responsible Chemical Management**





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## Climate and AccuSUSTAIN 2039 Roadmap

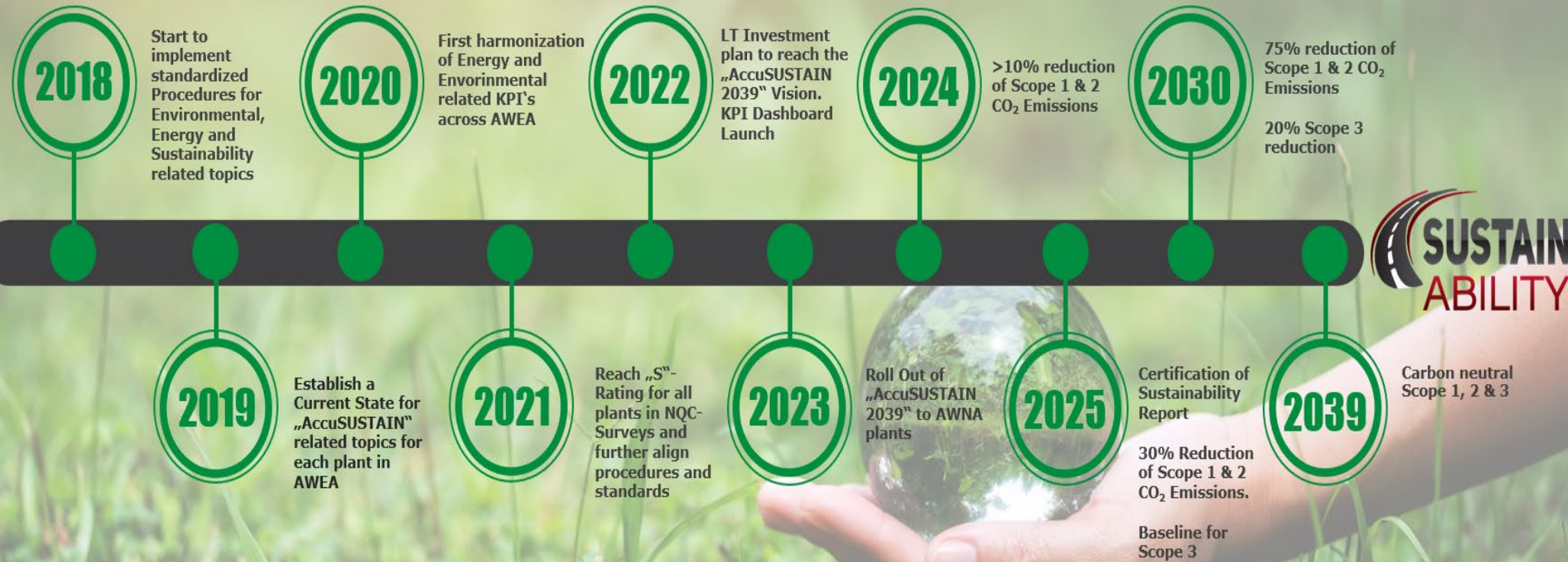
We acknowledge that addressing climate change is not just a moral obligation, it is an urgent and indispensable responsibility. We understand that the consequences of climate change are affecting ecosystems, economies, and communities worldwide. As a responsible organization, we are unwavering in our commitment to taking meaningful action to mitigate the impacts of climate change and pave the way for a sustainable and resilient future for everyone.

This commitment to environmental stewardship and sustainability is not a superficial promise but an integral part of how we operate and conduct business. We have integrated climate-conscious practices and principles into the very fabric of our company, from our daily operations to our long-term strategic planning.

Our vision is clear: We are dedicated to achieving carbon neutrality. We recognize that achieving this ambitious goal will demand concerted efforts, innovation, and collaboration from all stakeholders, including our employees, customers, and you, our valued supply partners.



# AccuSUSTAIN 2039



# AccuSustain 2039 Roadmap

Our AccuSustain 2039 Roadmap outlines our commitment to sustainable practices that transcend mere compliance. We are dedicated to making measurable progress towards environmental and social goals, and becoming the benchmark for responsible business conduct. We encourage our supply partners to align their operations with AccuSustain 2039, collectively working towards a brighter and more sustainable future.



## Increase in flood risk



Global warming increases the risk of more frequent—and heavier—rainfall, snowfall, and other precipitation. And as that risk increases, so too does the risk of flooding.

## Sea level rise by 2100



Rising sea levels could impact 1 billion people by the year 2050

## People exposed to extreme heat waves every 5 years



Heat waves will become more frequent and severe around the world, affecting hundreds of millions—or even billions—of people if we don't act.





## Net Zero Supply Chain

Our commitment to a net-zero future drives every facet of our operations, including our supply chain. We are resolute in our determination to achieve carbon neutrality, mitigating our greenhouse gas emissions and striving for a balance between emissions produced and removed from the atmosphere. We extend this ambition to our supply partners, urging them to collaborate with us in building a sustainable, climate-positive supply chain.

### What is Net Zero Supply Chain?

A net zero supply chain refers to the achievement of a balance between the greenhouse gas emissions produced within the supply chain and the amount of emissions removed from the atmosphere. In essence, it minimize the carbon footprint of the entire supply chain, from raw material extraction to product delivery and beyond.

**“Everything has a beginning, start the journey with us!”**

### Energy Consumption

Efficient energy use is at the heart of our sustainability efforts. We prioritize energy-saving practices and the adoption of renewable energy sources to minimize our environmental impact. Our supply partners are encouraged to take similar measures, optimizing energy consumption and actively seeking alternatives that contribute to the reduction of greenhouse gas emissions.



## Air Quality

A Breathable Environment for all, air quality directly affects human health and the environment. In Accuride we uphold stringent air quality standards within our operations. We seek supply partners who share in this commitment, ensuring that their practices contribute to improved air quality and the well-being of communities.



## Handling of Chemical and/or Biological Substances

The responsible management of chemicals and biological substances is essential to safeguarding health, safety, and the environment. We adhere to rigorous guidelines and expect our supply partners to exercise due diligence in the handling, storage, and disposal of such substances. Our collective efforts contribute to minimizing risks and promoting a safer working environment.







## **Animal welfare policy**

Suppliers must uphold high standards of animal welfare, ensuring humane treatment and adequate living conditions for animals. This includes providing proper nutrition, clean water, and sufficient space, while minimizing stress and suffering. Suppliers should comply with local and international animal welfare laws and continuously improve their practices. By adhering to these principles, suppliers promote ethical and humane treatment of animals in their supply chains.





## **Decarbonization:**

Decarbonization is the process of reducing or eliminating carbon dioxide (CO<sub>2</sub>) emissions from various activities, industries, and systems. It involves transitioning to low-carbon or carbon-neutral alternatives, such as renewable energy sources and sustainable technologies, to mitigate the impact of climate change. The goal of decarbonization is to significantly reduce the carbon footprint and dependence on fossil fuels, leading to a more sustainable and environmentally friendly future.

## **Decarbonization: Navigating a Sustainable Path**

Decarbonization is a multifaceted and critical endeavor aimed at reducing or eliminating carbon dioxide (CO<sub>2</sub>) and other greenhouse gas emissions from various sectors of the economy. This strategic effort is essential in addressing climate change, a global challenge with far-reaching consequences for our planet and future generations.

In the face of mounting evidence of climate change's impacts, decarbonization has emerged as a pressing imperative for governments, industries, and individuals alike. It involves a comprehensive rethinking of how we produce and consume energy, manufacture products, and conduct our daily lives.



## Supplier Expectations for Climate

In this pivotal era, where environmental concerns have transcended regional boundaries to become undeniable global imperatives, our reflection at Accuride is resolute and purposeful. We recognize that every entity, irrespective of its size or industry, bears a profound responsibility in shaping the world that will be inherited by future generations. This acknowledgment propels us forward with an unwavering commitment to not just embracing sustainability but fostering it as a guiding principle.

In this journey towards a greener and more conscientious future, we wholeheartedly extend our invitation to you, our valued suppliers. It is with great anticipation that we seek to join hands in constructing a foundation that's rooted in responsibility, resilience, and ethical progress. As we embark on this shared path, it is crucial to emphasize that our expectations for suppliers encompass a broad spectrum of critical areas, all harmoniously interwoven by a collective vision - a vision centered around the protection and preservation of our environment for the generations yet to come. We love by these goals are expect this from our suppliers in order to create a common future worth living.





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## Business Ethic and Data Safety

At Accuride, ethical business conduct is not merely a choice, it's at the core of who we are. We are deeply committed to cultivating a business environment that places a premium on transparency, fairness, and integrity. This commitment to ethical standards is not a mere slogan but an integral part of every decision we make. It forms the foundation of our corporate culture, fostering an atmosphere of trust and mutual respect among our team members.

In today's digital age, data safety is an essential component of ethical business conduct. We understand the significance of safeguarding personal and sensitive information. It's not just about legal compliance; it's about respecting the privacy and trust of our customers, employees, and stakeholders.






## **Business Integrity: The Essence of Our Collaboration**

Accuride's integrity is the cornerstone of how we conduct business. We embrace transparency, honesty, and fairness in all our interactions. Our commitment to business integrity extends to our supply partners, as we firmly believe that mutual success is rooted in a foundation of trust and ethical behavior.

## **Conflicts of Interest: Navigating Transparently**

Clear communication and transparency are our guides when addressing conflicts of interest. We avoid situations where personal interests compromise business decisions. Similarly, we expect our supply partners to disclose and manage potential conflicts openly, ensuring that our collaborations are free from bias and driven by shared goals.





## **Anti-Corruption: Zero Tolerance**

Corruption has no place in our business ethos. We rigorously adhere to anti-corruption laws and practices, prohibiting any form of bribery, extortion, or unethical influence. We entrust our supply partners to share our commitment to principled conduct, maintaining a corruption-free environment that safeguards the integrity of our partnerships.



# Use of private or public security forces

Suppliers must ensure that the use of private or public security forces is conducted in a manner that respects human rights and adheres to ethical standards. Security personnel must be properly trained to handle situations without resorting to excessive force or violating the rights of individuals. Suppliers are responsible for ensuring that security forces operate within the bounds of local and international laws, and that their actions are transparent and accountable.

The use of security forces should prioritize the safety and well-being of all individuals, including employees, local communities, and other stakeholders. Suppliers must implement measures to prevent and address any abuses or misconduct by security personnel. This includes establishing clear protocols for the use of force, conducting regular training on human rights and ethical behavior, and providing mechanisms for reporting and investigating incidents of abuse or misconduct.

Furthermore, suppliers must engage with local communities to understand their concerns and ensure that security measures do not negatively impact their rights or livelihoods. By adhering to these principles, suppliers contribute to a safe, respectful, and ethical working environment





## What is Fair Competition?

Fair competition refers to a market environment in which businesses and individuals compete based on their merits, without unfair advantages or unethical practices. It ensures that all participants have equal opportunities to succeed, and that competition is driven by innovation, quality, and efficiency rather than by unfair tactics such as monopolies, collusion, or deceptive practices. Fair competition fosters healthy economic growth, consumer choice, and encourages the best products and services to thrive.

## Confidentiality and Intellectual Property Rights

Respecting confidentiality and safeguarding intellectual property is paramount. We protect sensitive information with utmost diligence and uphold the rights of creators and innovators. We expect our supply partners to uphold a similar level of respect, ensuring the confidentiality of shared information and respecting intellectual property rights.

## Fair Competition: A Level Playing Field

Fair competition is the bedrock of our business ethos. We embrace competition that is ethical, respectful, and adheres to antitrust laws. Our commitment to fair competition extends to our supply partners, as we believe that an equitable marketplace benefits all. We encourage our partners to embrace competition that is rooted in integrity and compliance.





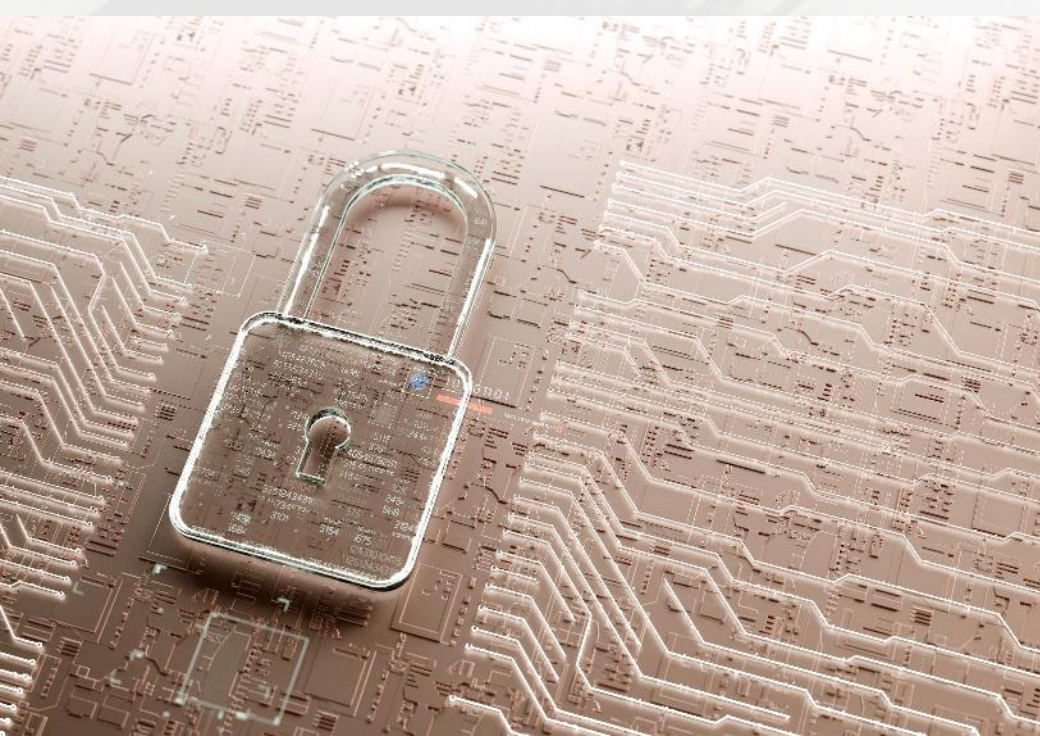
# Data Privacy: Safeguarding Personal Information

Data privacy is sacrosanct to us. We handle personal data with utmost care and adhere to rigorous data protection standards. We trust our supply partners to respect data privacy rights as well, ensuring that personal information is handled securely, transparently, and in accordance with applicable laws.



## What is Data Privacy?

Data privacy refers to the protection and management of individuals' personal information to ensure it is kept confidential, secure, and used only for authorized purposes. It involves measures and practices to safeguard data from unauthorized access, disclosure, alteration, or misuse. Data privacy is essential for maintaining individuals' trust and complying with legal and ethical standards regarding the handling of personal data. Organizations and individuals must take proactive steps to protect sensitive information and respect individuals' rights to control their own data.



## **Information Security: Fortifying Digital Boundaries**

Securing information in the digital age is paramount. We implement robust information security practices to safeguard sensitive data from breaches and cyber threats. We expect our supply partners to take similar precautions, fortifying their digital boundaries to protect both their operations and the data of all stakeholders.

## **Plagiarism: Upholding Originality and Innovation**

Originality and innovation drive progress. We are steadfast in our commitment to upholding intellectual property rights and preventing plagiarism. Our supply partners are urged to respect these principles, fostering a culture of creativity and integrity that enriches our collaborative efforts.





## **Supplier Expectations for Business Ethic and Data Safety**

In this dynamic era of shifting business landscapes, our interactions extend far beyond the tangible exchange of products and services. Rather, it is the very bedrock of principles and values that form the cornerstone of our collaborations. At Accuride, we hold a steadfast conviction that the essence of our partnership delves beyond mere transactions; it ventures into a realm where business ethics, data safety, and responsible practices seamlessly intersect. It is with a sense of deep privilege that we articulate our expectations, as we invite you, our esteemed suppliers, to join us on an inspiring journey towards crafting a business ecosystem characterized by integrity, transparency, and unwavering sustainability.

Part of us is about ethics and data security, so we can and must expect the same from our suppliers to ensure that we pursue a common goal. The above points are therefore essential and are lived and required by us.



# Export controls and economic sanctions

Compliance with all applicable export controls and economic sanctions laws and regulations is mandatory. This includes ensuring that products, services, and technologies are not used in violation of these laws. Robust compliance programs must be implemented to prevent unauthorized exports and transactions with sanctioned entities or individuals. Adhering to these requirements helps maintain global security and uphold international legal standards.



## Last words

Our Supplier Code of Conduct is a strategic roadmap that we extend to our valued suppliers. By embracing and adhering to this Code of Conduct , suppliers join us on a transformative journey towards a greener future.

It serves as a clear set of guidelines and expectations, harmonizing our collective efforts to drive sustainable practices throughout our supply chain. The Code of Conduct underscores our commitment to environmental stewardship, ethical conduct, and social responsibility.

By adopting and complying with the Code of Conduct , suppliers actively contribute to our mission of creating a positive impact on the environment and society. Through this mutual dedication to responsible practices, we pave the way for a more sustainable tomorrow. The Code of Conduct outlines the principles that guide our partnership and sets the tone for our shared journey towards a greener, more ethical, and socially conscious future.

Together, we can create meaningful change and forge a path into the era of responsible and sustainable business practices.

**“Let’s Shape  
the Future  
Today!”**

