

## 1. Präambel

VAT Manufacturing Malaysia Sdn. Bhd, MY – 14100 Simpang Ampat, is an international company of excellent global repute that is proud of its long tradition and market leadership in vacuum valve technology. The present VAT Supplier Code of Conduct is fully aligned with the overarching “VAT Code of Conduct” and constitutes an integral part of responsible and sustainable management at VAT. Compliance with the VAT Supplier Code of Conduct is mandatory for all VAT suppliers worldwide. The VAT Supplier Code of Conduct reflects the principles of the EICC codex “Code of Conduct”. By complying with the rules and principles laid out in the EICC codex, we help ensure the long-term success of our company

All business is conducted in compliance with governing national and international laws and regulations. As a matter of principle, we honor agreements and obligations we have entered into voluntarily. All suppliers are obliged to carefully study the rules and regulations pertinent to their area of responsibility and ensure full compliance. In case of doubt or queries, they are obliged to seek additional information and guidance from the appropriate channels or persons in charge. VAT has a zero tolerance policy with regard to violations of its Supplier Code of Conduct. Violations may lead to appropriate action being taken against the supplier.

## 2. Fair competition

VAT expects all suppliers to fully comply with applicable statute so as to protect fair competition in the marketplace. As a matter of principle, applicable laws prohibit: the fixing of prices, terms and conditions among competitors; agreements between competitors on dividing up markets and customers among themselves; coordinated actions among competitors with a view to prices, terms, conditions, markets and customers; as well as any other illegal or unfair practices

## 3. No corruption

VAT firmly believes in the high quality of its products and the high performance of its suppliers. VAT is strictly against any form of direct or indirect bribery of business associates or public officials. It is strictly prohibited for VAT suppliers to request, ask for, or accept any form of personal gratification when procuring supplies or services. VAT suppliers are also prohibited from offering or granting any advantages or gratifications to any business associates.

## 4. Preventing conflicts of interest

VAT expects from its suppliers not to engage in any activities or accept any tasks that might be in conflict with the interests of VAT

## 5. Compliance with national and international foreign trade regulations

VAT fully complies with all national and international trade regulations. All VAT suppliers are requested to observe applicable export and import restrictions, public authorization requirements as well as governing customs and tax regulations.

VAT places utmost importance on compliance with national and international regulations prohibiting money laundering as well as responsible handling of critical raw materials (e.g., conflict minerals).

## 6. Protecting VAT assets

VAT expects from all its suppliers to handle the assets of VAT conscientiously and responsibly. All business decisions must be based on a transparent commercial assessment of risks and benefits. This also includes a diligent check of the integrity of all business associates of VAT suppliers

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VAT places utmost importance on the integrity of its suppliers. VAT reserves the right to check the financial situation and personal integrity of suppliers, based on the type of business transactions or activities they are engaged in, and on the locations where they conduct business.

## 7. Environmental protection and product safety

In the course of its regular business operations, VAT is committed to protecting the environment and handling natural resources responsibly. All VAT suppliers are therefore obliged to observe governing laws and regulations on environmental protection and to utilize resources such as electricity, water and heating energy economically, with care and diligence.

VAT has set highest standards for itself regarding the quality, reliability and safety of its products over the complete product life cycle. All VAT products must meet the requirements of the applicable product safety policies. Documentary evidence requirements apply.

## 8. No discrimination

VAT expects from its suppliers that they respect different ways of life, different cultures and country-specific custom when interacting with their employees, temporary staff, trainees and apprentices, former employees as well as external business partners and associates.

VAT suppliers are guided solely by objective and fully transparent criteria in all dealings with VAT and other business associates. VAT suppliers provide a working environment for their employees where there is zero tolerance for any form of discrimination, harassment or disadvantages due to race, ethnic background, gender, religion, belief system, disability, age or sexual identity.

## 9. Data protection

VAT respects the personal and privacy rights of its suppliers. VAT compiles, processes and uses personal data of its suppliers solely to the extent to which this is necessary for the business operations of VAT. All applicable data protection provisions are fully observed. Personal data are stored safely and are suitably protected against unauthorized access. VAT expects all its suppliers to strictly comply with applicable data protection laws and regulations as well.

## 10. Handling public media


In the interest of a strong global image, VAT is committed to transparent, consistent two-way communication with the public and public media. Official statements on behalf of VAT may only be made by specifically authorized VAT personnel.

## 11. Implementing the VAT Supplier Code of Conduct

The management of each individual entity within a supplier's organization is responsible for implementing the VAT Supplier Code of Conduct in their respective area of responsibility. They are obliged to take all appropriate action and provide the required structures and resources to ensure that all employees in the entity are familiar with the VAT Supplier Code of Conduct and that its principles are fully implemented.

All VAT suppliers are encouraged to direct any questions they might have with regard to the contents, interpretation or implementation of the VAT Supplier Code of Conduct to the VAT Strategic Procurement function.

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	<b>Strategic Procurement</b>	<b>BP01FO30E</b>
Vakuumventile AG	<b>Supplier Code of Conduct</b>	Page 3 of 3

We, the undersigned, hereby confirm and declare in the name and on behalf of our company that

1. we have received the VAT Supplier Code of Conduct;
2. by signing this declaration, we accept and commit to complying with all rules and requirements as laid out in the VAT Supplier Code of Conduct;
3. we accept that this declaration shall be exclusively governed by the material laws of Malaysia, excluding the UN Law of Sales (CISG).

Place/Date \_\_\_\_\_

Company \_\_\_\_\_

Street \_\_\_\_\_

Post code/city \_\_\_\_\_

Name of authorized signatory \_\_\_\_\_

Signature \_\_\_\_\_

1. **Please sign one (1) original copy of this document.**
2. *Please note that only duly authorized personnel of your company may sign this document.*
3. *Please send the duly signed original copy by conventional mail to:*  
**VAT Manufacturing Malaysia Sdn. Bhd, 720 Persiaran Cassia Selatan 1, MY – 14100 Simpang Ampat**

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