# ARFESAN ARKAN FREN ELEMANLARI SANAYİ VE TİCARET A.Ş.

## SUPPLIER SUSTAINABILITY POLICY



***04.07.2024***
***REVISION.4***

**Gebze Organize Sanayi Bölgesi 300. Sokak No:304 Gebze/KOCAELİ**

| Quality Approval | Purchasing Approval | Managing Director |
|---|---|---|
| Mrs. Devrim TEZCAN | Mr. Cem DURUM | Mr. Murat ULUTAŞ |

| Rev. No | Revizyon Date | Revision Detail | Revision by |
|---|---|---|---|
| 1 | 14.10.2019 | Released. | Taner SİPAHİOĞLU |
| 2 | 05.06.2023 | Updated. | Taner SİPAHİOĞLU |
| 3 | 27.06.2023 | Updated | Taner SİPAHİOĞLU |
| *4* | *04.07.2024* | *Updated* | *Taner SİPAHİOĞLU* |

**Arfesan A.Ş. Company Profile**

| | |
|---|---|
| Founded | Unlimited Company - 1969<br>Incorporated company - 1984 |
| Plant | Closed Area 15.000 m² / Total Area 18.000 m² |
| Managing Director | Mr. Murat ULUTAŞ |
| Quality Manager | Mrs. Devrim TEZCAN |
| Supply Chain Manager | Mr. Cem DURUM |
| Working Hours | 45 hours/ week |
| Major Customers | Truck, Trailer and Bus OE's |
| Products | Service Brake Chambers<br>Double Diaphragm Brake Chambers<br>Piston Brake Chambers<br>Valves,<br>Other automotive components or equipment |
| Production Area | Press Shop, Welding Shop, Powder Coating Line, Mold Shop, Assembly |

Management Systems

| Management System | Date | Company |
|---|---|---|
| ISO 9001 | 1996 | Dansk Standard |
| ISO 14001 | 2003 | DNV |
| ISO/TS 16949 | 2003 | DNV |
| ISO 14001 | 2006 | DNV |
| ISO/TS 16949 | 2006 | TÜV-NORD |
| ISO 14001 | 2009 | LRQA |
| ISO/TS 16949 | 2009 | LRQA |
| ISO 14001 | 2012 | TÜV-SÜD |
| ISO/TS 16949 | 2012 | TÜV-SÜD |
| ISO 14001 | 2015 | TÜV-SÜD |
| ISO/TS 16949 | 2015 | TÜV-SÜD |
| ISO 9001 | 2015 | TÜV-SÜD |
| IATF 16949 | 2018 | TÜV-SÜD |
| ISO 9001 | 2018 | TÜV-SÜD |
| ISO 14001 | 2018 | TÜV-SÜD |

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|---|---|
| Other Certification | TÜV Cert. 2015 / TSE 9746 ve TSE 9747 |

**Scope:**

ARFESAN A.S. is leader in Turkey and takes place among the leader organizations, which operate internationally, in manufacture of the brake chamber for heavy commercial vehicles. Since 1969, it manufactures any products in a high technology and services the domestic and international automotive industry.
Since its establishment, "ARFESAN A.S." has carried out and continues to carry out its activities in accordance with the principles of being a pioneer, leader and example.

The reputation and quality standards that we gain and submit with ARFESAN trademark arouse in our applications built on our principles. The "ARFESAN SUPPLIER SUSTAINABILTY POLICY" contains the determinative methods and basic principles and our framework of values defined by us "Five Ds ARFESAN" during execution of the activities of ARFESAN A.S.

**ARFESAN'S BASIC PRINCIPLES:**

To be a pioneer, leader and example.

**ARFESAN's FIVE Ds:**

(DOĞRU) Be Right! This is the tenth village.

(DÜRÜST) Be honest! Then you cannot fool yourself.

(DÜZENLİ) Be Regular! Then you will not make mistakes.

(DENGELİ) Be Balanced! Respect and love are earned in this way.

(DİNAMİK) Be Dynamic! Life is short and there are more works to do.

Our principles have a binding nature on all employees, Shareholders, Members of Board of Directors, suppliers, and briefly all our stakeholders. Arfesan respects and accepts the following UN Global Compact – 10 Principles;

Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
Principle 2: make sure that they are not complicit in human rights abuses.

Labour

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
Principle 4: the elimination of all forms of forced and compulsory labour;
Principle 5: the effective abolition of child labour; and
Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment
Principle 7: Businesses should support a precautionary approach to environmental challenges;
Principle 8: undertake initiatives to promote greater environmental responsibility; and
Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

The supplier sustainability policy *declares* sustainability requirements for all direct suppliers, all indirect suppliers and their sub-suppliers;

1- Labor Rights *Declaration*
2- Health and Safety *Declaration*
3- Environmental *Declaration*
4- Ethics *Declaration*
5- Management Systems Requirements *Declaration*

*Arfesan Supplier Sustainability Policy also declared and published in www.arfesan.com.tr official web site and shared with all suppliers through B2B system.*

**Purpose:**

Arfesan sets out the standards and the ethic behaviors we require from our suppliers and their suppliers to improve conditions for workers and to promote a cleaner environment for a better world.

We expect all Arfesan suppliers and providing products, components, parts, sub-assemblies, materials, packaging, services or solutions to comply with this Supplier Sustainability Policy.

We expect all suppliers to force their own suppliers to build their own definition and implementation of similar standards.

## 1- LABOR RIGHTS *DECLARATION*

Suppliers are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker.

The labor standards are:

### 1.1- Freely Chosen Employment

Forced, bonded (including debt bondage) or indentured labor, involuntary or exploitative prison labor, slavery or trafficking of persons (human trafficking) shall not be used. This includes transporting, harboring, recruiting, transferring or receiving persons by means of threat, force, coercion, abduction or fraud for labor or services. There shall be no unreasonable restrictions on workers' freedom of movement in the facility in addition to unreasonable restrictions on entering or exiting company-provided facilities. As part of the hiring process, workers must be provided with a written employment agreement in their native language that contains a description of terms and conditions of employment prior to the worker departing from his or her country of origin and there shall be no substitution or change(s) allowed in the employment agreement upon arrival in the receiving country unless these changes are made to meet local law and provide equal or better terms. All work must be voluntary and workers shall be free to leave work at any time or terminate their employment. Employers and agents may not hold or otherwise destroy, conceal, confiscate or deny access by employees to their identity or immigration documents, such as government issued identification, passports or work permits, unless such holdings are required by law. Workers shall not be required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees shall be repaid to the worker.

### 1.2- Young Workers

Child labor is not to be used in any stage of manufacturing. The term "child" refers to any person under the age of 15, or under the age for completing compulsory education, or under the minimum age for employment in the country, whichever is greatest. The use of legitimate workplace learning programs, which comply with all laws and regulations, is supported. Workers under the age of 18 (Young Workers) shall not perform work

that is likely to jeopardize their health or safety, including night shifts and overtime. Supplier shall ensure proper management of student workers through proper maintenance of student records, rigorous due diligence of educational partners, and protection of students' rights in accordance with applicable law and regulations.

Supplier shall provide appropriate support and training to all student workers. In the absence of local law, the wage rate for student workers, interns and apprentices shall be at least the same wage rate as other entry-level workers performing equal or similar tasks.

**1.3-** Working Hours

Working hours are not to exceed the maximum set by local law. Further, a workweek should not be more than 60 hours per week, including overtime, except in emergency or unusual situations. Workers shall be allowed at least one day off every seven days.

**1.4-** Wages and Benefits

Compensation paid to workers shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. In compliance with local laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Deductions from wages as a disciplinary measure shall not be permitted. For each pay period, workers shall be provided with a timely and understandable wage statement that includes sufficient information to verify accurate compensation for work performed. All use of temporary, dispatch and outsourced labor will be within the limits of the local law.

**1.5-** Humane Treatment;

There is to be no harsh and inhumane treatment including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers; nor is there to be the threat of any such treatment. Disciplinary policies and procedures in support of these requirements shall be clearly defined and communicated to workers.

**1.6-** Non-Discrimination- Diversity, Equity and Inclusion

Supplier should encourage a diverse and inclusive working environment in the supply chain where everyone is accepted, valued and receives fair treatment according to their different needs and situations without discrimination or prejudice.

Suppliers should be committed to a workforce free of harassment and unlawful discrimination. Companies shall not engage in discrimination based on race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, political affiliation, union membership, protected genetic information or marital status in hiring and employment practices such as wages, promotions, rewards, and access to training. Workers shall be provided with reasonable accommodation for religious practices. In addition, workers or potential workers should not be subjected to medical tests or physical exams that could be used in a discriminatory way.

**1.7-** Freedom of Association

In conformance with local law, Suppliers shall respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respect the right of workers to refrain from such activities. Workers and/or their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.

**1.8-**Women Rights

Safe Work: The supplier will provide appropriate and reasonable accommodations for women workers in connection with pregnancy, childbirth, and nursing. The supplier will comply with any working hour limits or other work restrictions for pregnant and nursing workers required by local law and take other reasonable measures to protect pregnant women from hazardous work including restricted work hours as recommended by a licensed physician.

Pregnancy Testing: Pregnancy tests will not be a condition of employment, nor will they be demanded of workers, unless required by local law. Voluntary pregnancy tests may be provided, but only at the request of the worker, and each such request will be documented.

Contraception: Workers will not be forced or pressured by the supplier to use contraception.

Maternity Leave: Women workers are entitled to maternity leave in accordance with the requirements of local law. Workers who take maternity leave will not face dismissal nor threat of dismissal, loss of seniority or deduction of wages, and will be able to return to their former employment at the same rate of pay and benefits after the maternity leave has ended.

**1.9-**Rights Of Minorities And Indigenous Peoples

Suppliers should respect the rights of local communities to decent living conditions; education, employment, social activities and the lands on which they live, with consideration for the presence of vulnerable groups.

**1.10-**Ethical Recruiting

Suppliers must not mislead or defraud potential workers about the nature of work, ask workers to pay recruitment fees and/or confiscate, destroy, conceal and/or deny access to worker passports and other government-issued identity documents. Workers should receive a written contract or employment notification at the start of their recruitment in a language well understood by them, stating in a truthful, clear manner their rights and responsibilities.

**1.11-**Use of Private or Public Security Forces

Supplier should prioritize the safety and protection of their workers by taking steps to help prevent incidents of violence from occurring in the workplace. Prompt and remedial action should be taken against anyone who engages in any inappropriate and/or unlawful act or behaviour.

## 2- HEALTH AND SAFETY *DECLARATION*

Suppliers recognize that in addition to minimizing the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers also recognize that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace. Recognized management systems such as OHSAS 18001 and ILO Guidelines on Occupational Safety and Health were used as references in preparing the policy and may be a useful source of additional information.

The health and safety standards are:

**2.1**- Occupational Safety

Worker potential for exposure to safety hazards (e.g., chemical, electrical and other energy sources, fire, vehicles, and fall hazards) are to be identified and assessed, and controlled through proper design, engineering and administrative controls, preventative maintenance and safe work procedures (including lockout/tagout), and ongoing safety training. Where hazards cannot be adequately controlled by these means, workers are to be provided with appropriate, well-maintained, personal protective equipment and educational materials about risks to them associated with these hazards. Reasonable steps must also be taken to remove pregnant women/nursing mothers from working condition with high hazards, remove or reduce any workplace health and safety risks to pregnant women and nursing mothers including those associated with their work assignments, as well as include reasonable accommodations for nursing mothers.

**2.2-** Emergency Preparedness

Potential emergency situations and events are to be identified and assessed, and their impact minimized by implementing emergency plans and response procedures including: emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, clear and unobstructed egress adequate exit facilities and recovery plans. Such plans and procedures shall focus on minimizing harm to life, the environment and property.

**2.3-** Occupational Injury and Illness

Procedures and systems are to be in place to prevent, manage, track and report occupational injury and illness including provisions to: encourage worker reporting; classify and record injury and illness cases; provide necessary medical treatment; investigate cases and implement corrective actions to eliminate their causes; and facilitate return of workers to work.

**2.4-** Industrial Hygiene

Worker exposure to chemical, biological and physical agents is to be identified, evaluated, and controlled according to the hierarchy of controls. Potential hazards are to be eliminated or controlled through proper design, engineering and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment. Protective programs shall include educational materials about the risks associated with these hazards.

**2.5-** Physically Demanding Work

Worker exposure to the hazards of physically demanding tasks, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks is to be identified, evaluated and controlled.

**2.6-** Machine Safeguarding

Production and other machinery shall be evaluated for safety hazards. Physical guards, interlocks and barriers are to be provided and properly maintained where machinery presents an injury hazard to workers.

**2.7**- Sanitation, Food, and Housing

Workers are to be provided with ready access to clean toilet facilities, potable water and sanitary food preparation, storage, and eating facilities. Worker dormitories provided by the Supplier or a labor agent are to be maintained to be clean and safe, and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting heat and ventilation, individually secured accommodations for storing personal and valuable items, and reasonable personal space along with reasonable entry and exit privileges.

**2.8-** Health and Safety Communication

Supplier shall provide workers with appropriate workplace health and safety information and training in the language of the worker or in a language the worker can understand for all identified workplace hazards that workers are exposed to, including but not limited to mechanical, electrical, chemical, fire, and physical hazards. Health and safety related information shall be clearly posted in the facility or placed in a location identifiable and accessible by workers. Training is provided to all workers prior to the beginning of work and regularly thereafter. Workers shall be encouraged to raise safety concerns.

## 3. ENVIRONMENTAL *DECLARATION*

Suppliers recognize that environmental responsibility is integral to producing world class products. In manufacturing operations, adverse effects on the community, environment and natural resources are to be minimized while safeguarding the health and safety of the public. Recognized management systems such as ISO 14001 and the Eco Management and Audit System (EMAS) were used as references in preparing the policy and may be a useful source of additional information.

The environmental standards are:

**3.1-** Environmental Permits and Reporting

All required environmental permits (e.g. discharge monitoring), approvals and registrations are to be obtained, maintained and kept current and their operational and reporting requirements are to be followed.

**3.2-** Pollution Prevention and Resource Reduction

Emissions and discharges of pollutants and generation of waste are to be minimized or eliminated at the source or by practices such as adding pollution control equipment; modifying production, maintenance and facility processes; or by other means. The use of natural resources, including water, fossil fuels, minerals and virgin forest products, is to be conserved or by practices such as modifying production, maintenance and facility processes, materials substitution, re-use, conservation, recycling or other means.

**3.3-** Hazardous Substances

Chemicals and other materials posing a hazard to humans or the environment are to be identified, labelled and managed to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.

**3.4-** Waste – Reuse/Recycle

Supplier shall implement a systematic approach to identify, manage, reduce, and responsibly dispose of or recycle waste (non-hazardous).

Supplier shall use reusable packaging material as well as the part design allows, if not the packaging solution must be a recyclable solution.

**3.5-** Emissions Air & Noise

Air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations are to be characterized, routinely monitored, controlled and treated as required prior to discharge. Supplier shall conduct routine monitoring of the performance of its air emission control systems.

The supplier to refrain harmful changes to the soil, water and air pollution, harmful noise emissions, and excess water consumption that significantly impair the natural foundations for the cultivation and the

production of food, prevent people from accessing safe drinking water, impair or inhibit access to sanitary facilities, or are harmful to health.

**3.6-** Materials Restrictions

Suppliers are to adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances in products and manufacturing, including labeling for recycling and disposal.

**3.7-** Water Management

Supplier shall implement a water management program that documents, characterizes, and monitors water sources, use and discharge; seeks opportunities to conserve water; and controls channels of contamination. All wastewater is to be characterized, monitored, controlled, and treated as required prior to discharge or disposal. Supplier shall conduct routine monitoring of the performance of its wastewater treatment and containment systems to ensure optimal performance and regulatory compliance.

**3.8-** Energy ,Greenhouse Gas Emissions and Decarbonisation

Supplier are expected to minimize the use of energy and, where available, to substitute renewable sources of energy for non-renewable sources. Supplier Partners are expected to have programs in place to support these initiatives related to greenhouse gas emissions and to work to reduce absolute energy consumption in their processes. Any required permits limiting the amount of emissions must be obtained and adhered to, and a system must be in place to monitor the emission controls.

Supplier undertakes to implement measures to reduce its direct and indirect CO2e emissions (including in its upstream value chain). This includes, for example, the use of green electricity and the use of secondary materials or biomaterials. Supplier is expected to ensure transparency with regard to their own emissions as well as those of the upstream supply chains (e.g. by using life cycle assessments (LCA)), and to set reduction targets, including targets that apply to their supply chain.

**3.9-** Animal Welfare

Suppliers should respect the five animal freedoms formalized by the World Organization for Animal Health (OIE) concerning animal welfare. No animal should be raised and killed for the single purpose of being used in an automotive product. Arfesan does not conduct or commission the use of animals in tests for research purposes or in the development of our products, directly or indirectly. Supplier will not supply any raw materials, components, parts or assemblies to Arfesan that involved testing on animals in its research or development.

**3.10-** Biodiversity, Land Use And Deforestation, Soil Quality

Supplier should protect ecosystems, especially key biodiversity areas, impacted by their operations, and avoid illegal deforestation in accordance with international biodiversity regulations, including the IUCN Resolutions and Recommendations on Biodiversity. All suppliers are expected to know and abide by applicable environmental laws and regulations and to manage their environmental impacts and aspects responsibly. Required permits and licenses must be obtained and their requirements adhered to. Suppliers should routinely monitor and control their impact on soil quality to prevent soil erosion, nutrient degradation, subsidence, and contamination. Supplier should commit to the avoidance of forced eviction and the deprivation of land, forests and waters in the acquisition, development or other use of land, forests and waters.

## 4. ETHICS *DECLARATION*

To meet social responsibilities and to achieve success in the marketplace, Suppliers and their agents are to uphold the highest standards of ethics including:

**4.1-** Business Integrity

The highest standards of integrity are to be upheld in all business interactions. Suppliers shall have a zero tolerance policy to prohibit any and all forms of bribery, corruption, extortion and embezzlement. Principal responsibility of the supplier should be to prevent the benefits of our business relation from conflicting with any direct and/or indirect personal benefits

**4.2-** No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value, either directly or indirectly through a third party, in order to obtain or retain business, direct business to any person, or otherwise gain an improper advantage. Monitoring and enforcement procedures shall be implemented to ensure compliance with anti-corruption laws.

**4.3-** Disclosure of Information

All business dealings should be transparently performed and accurately reflected on Supplier's business books and records. Information regarding Supplier labor, health and safety, environmental practices, business activities, structure, financial situation and performance is to be disclosed in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the supply chain are unacceptable.

**4.4-** Intellectual Property

Intellectual property rights are to be respected; transfer of technology and know- how is to be done in a manner that protects intellectual property rights; and, customer and supplier information is to be safeguarded.

**4.5-** Fair Business, Advertising, Competition and Counterfeit Parts

Standards of fair business, advertising and competition are to be upheld. On anti-trust business structure or counterfeit parts, the local laws should be upheld.

Supplier shall ensure the existence of methods and processes to: minimize the risk of introduction of counterfeit parts into final products; detect counterfeit parts and materials; provide notification to recipients of counterfeit products; and remove any counterfeit parts from the final products.

**4.6-** Protection of Identity and Non-Retaliation

Programs that ensure the confidentiality, anonymity and protection of supplier and employee whistleblowers 2 are to be maintained, unless prohibited by law. Suppliers should have a communicated process for their personnel to be able to raise any concerns without fear of retaliation.

**4.7-** Responsible Sourcing of Minerals

Suppliers shall have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture does not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. Suppliers shall exercise due diligence on the source and chain of custody of these minerals and make their due diligence measures available to customers upon customer request.

**4.8-** Privacy

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

**4.9-** Business Records and Disclosure of Information

Supplier shall accurately record and disclose information (accurate records) regarding their business activities, structure, financial situation and performance in accordance with applicable laws and regulations as well as industry business standards.

Suppliers are to commit to protecting the reasonable privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared.

**4.10-** Export Controls & Economic Sanctions

Supplier shall accurately record and disclose information (accurate records) regarding their business activities, structure, financial situation and performance in accordance with applicable laws and regulations as well as industry business standards.

Supplier are expected to comply with all applicable export control laws, as well as laws that prohibit or restrict business relationships with sanctioned countries, entities, persons or industry sectors. Supplier Partners should conduct appropriate due diligence to comply with sanctions, export controls and anti-boycott requirements. Supplier are also expected to maintain accurate and complete records related to customs activities.

## 5. MANAGEMENT SYSTEMS *REQUIREMENT DECLARATION*

Suppliers shall adopt or establish a management system whose scope is related to the content of this policy. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the Supplier's operations and products; (b) conformance with this policy; and (c) identification and mitigation of operational risks related to this policy. It should also facilitate continual improvement.

The management system should contain the following elements:

**5.1-** Company Commitment

A corporate social and environmental responsibility policy statements affirming Supplier's commitment to compliance and continual improvement, endorsed by executive management and posted in the facility in the local language.

**5.2-** Management Accountability and Responsibility

The Supplier clearly identifies senior executive and company representative[s] responsible for ensuring implementation of the management systems and associated programs. Senior management reviews the status of the management system on a regular basis.

**5.3 -** Legal and Customer Requirements

A process to identify, monitor and understand applicable laws, regulations and customer requirements, including the requirements of this policy.

**5.4-** Risk Assessment and Risk Management

A process to identify the legal compliance, environmental, health and safety3 and labor practice and ethics risks associated with Supplier's operations. Determination of the relative significance for each risk and implementation of appropriate procedural and physical controls to control the identified risks and ensure regulatory compliance.

**5.5-** Improvement Objectives

Written performance objectives, targets and implementation plans to improve the Supplier's social and environmental performance, including a periodic assessment of Supplier's performance in achieving those objectives.

**5.6-** Training

Programs for training managers and workers to implement Supplier's policies, procedures and improvement objectives and to meet applicable legal and regulatory requirements.

**5.7-** Communication

A process for communicating clear and accurate information about Supplier's policies, practices, expectations and performance to workers, suppliers and customers.

**5.8-** Worker Feedback, Participation and Grievance

Ongoing processes, including an effective grievance mechanism, to assess employees' understanding of and obtain feedback on or violations against practices and conditions covered by this policy and to foster continuous improvement.

**5.9-** Audits and Assessments

Periodic self -evaluations to ensure conformity to legal and regulatory requirements, the content of the policy and customer contractual requirements related to social and environmental responsibility.

**5.10-** Corrective Action Process

A process for timely correction of deficiencies identified by internal or external assessments, inspections, investigations and reviews.

**5.11-**Documentation and Records

Creation and maintenance of documents and records to ensure regulatory compliance and conformity to company requirements along with appropriate confidentiality to protect privacy including export controls and economic sanctions and financial responsibilities.

**5.12**-Supplier Responsibility

A process to communicate the policy requirements to suppliers and to monitor supplier compliance to the policy.