Supplier Code of Conduct
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1. Introduction

To ensure that Leviton can continue to meet the high standards that our customers expect, we have developed this “Code of Conduct” which sets out many of the expectations and requirements that Leviton has of its suppliers.

The foundation of the relationship between Leviton and its suppliers will be based around these requirements as well as the specific Supply Contract or Terms and Conditions of Purchase which are agreed between each party. If there is any inconsistency between the requirement set forth and the specific Supply Contract or Leviton’s Terms and Conditions of Purchase, the Supply Contract or Purchase Order Contract will control.

The key objectives of the Code of Conduct are:

- Provide a consistent set of processes for working with all our suppliers
- Ensure that all supplied product meets our requirements and those of our customers
- Clear and transparent approach to our supplier relationship management
- Ensuring that Leviton and its suppliers have an ethical and sustainable philosophy

2. General Principles

Leviton’s primary commitment is to provide to its customers the right products, on time and to be 100% defect-free.

In order to support this, the mission of the Procurement team is:

‘To build a flexible, competitive and sustainable Supply Chain model that anticipates our customers’ needs.’

We rely on our supply partners to help us achieve this and we require each supplier to be committed to:

- Delivery accuracy
- 100% right first-time principles
- Zero defects
- Delivery of product at the right price
- Adopt a principle of continuous improvement in all areas including pricing

3. Quality Management System Requirements

Suppliers shall be certified to a minimum of ISO9001 level by an accredited certification body. If Leviton deems it necessary to award business to a supplier who is not certified to this level, or with an unrecognized certification body. The supplier may be subject to a higher level of assessment and/or monitoring.

Suppliers will be required to supply copies of valid certificates to Leviton to validate the above. The certificates should be re-issued pro-actively by the suppliers on recertification and/or change of business details, e.g. acquisition.
4. Approvals / Performance / Development

4.1 Approvals

Dependant on the nature of parts to be supplied to Leviton the supplier will be subject to a level of formal assessment (Tier 1, 2 or 3). That level will be determined based on a risk assessment of a number of factors including (but not exhaustive): -

- Impact to product quality in terms of fit, form and function
- Impact to processes, safety or compliance to regulations e.g. conflict minerals, RoSH, REACH, etc.
- Financial assessment
- Knowledge and previous experience of market and/or products to be supplied
- Geographical location in relation to Leviton for supplier development/monitoring

Assessment activities include (but not exhaustive): -

- Supplier completed questionnaires
- Full site assessment
- Request for financial reports

Leviton expects full support of its suppliers during this important phase, all information supplied will be under the terms of a confidentiality agreement previously signed between parties.

4.2. Performance Monitoring

Leviton conducts quarterly reviews of its Tier 1 suppliers as defined as part of the risk assessment above and previous assessments. These reviews will be based on: -

- Performance data, e.g. on-time delivery, stock-outs
- Business risk assessment
- Other factors e.g. responsiveness, pro-active approach to relationship, environmental / sustainability

We will aim to communicate the outcome of this assessment in a reasonable timeframe and work with the supplier to identify areas of improvement required as well as acknowledgment of positive improvements made since last review.

Leviton or its designated auditors (internal, agent or third party) shall have the right to monitor and assess compliance with these principles. A violation of any of the points in this manual – code of conduct may result in a required corrective action, cancellation of purchase order(s) and/or termination of the business relationship.

4.3. Development

Where the above has highlighted a concern we may move a supplier into a more formal development phase. This is where we would communicate particular areas of concern and ask that the supplier issues an action plan to address these concerns. Leviton will provide support and/or guidance this action plan would then be implemented and monitored to ensure the required standard was achieved.
5. Minimum Quality Requirements

It is expected that the supplier complies with the industry standards and practice.

Listed below are some of the requirements we may be looking for from approved suppliers to Leviton of production goods and services.

- **Design Phase**
  - Change Control System
  - DFMEA

- **Supply Chain Management**
  - Sub Supplier Quality Plan (if applicable)
  - Inventory management systems including FIFO
  - Material Performance Test Results for purchased components
  - Records of compliance with specifications
    (Certificate of Conformity or equivalent)

- **Manufacturing**
  - Process flow diagram
  - Control Plans
  - PFMEA or similar risk assessment tool
  - Appearance Approval Report / Cosmetic Standards

- **Quality Controls**
  - First Article Inspection report including initial process studies (CPK)
  - Calibration system / Qualified Laboratory Documentation
  - Sample Products as part of FAI
  - Training and Competence Matrix
  - Formal Problem Solving tool e.g. 8D
  - Contingency Planning e.g. labor shortages, key equipment failure

6. Health and Safety

There should be clear evidence of a commitment to Health and Safety within the suppliers organization ideally with an appointed member of staff with defined Health and Safety responsibility.

The supplier must be able to provide evidence, if requested, that it complies with all applicable regulations with regards to Health and Safety.

The supplier must ensure that it provides a safe working environment with a documented risk assessment program in place. Including the appropriate Personal Protective Equipment and equipment guards.

The supplier must provide, if requested, full details of its accident statistics.
7. Environmental Standards and Sustainability

The supplier should have a formal compliance program that ensures it meets all applicable environmental laws and regulations that apply to their business. The program should also drive initiatives to minimize environmental impact and continual improvement. Ideally the supplier will use the ISO14001 platform or a comparable standard.

Our suppliers are strongly encouraged to protect the environment by: operating in a sustainable manner, where possible; conserving and protecting resources, such as water and energy; and taking into consideration environmental issues that may impact local communities.

The supplier will provide, if requested, its Green House Gas emissions as part of Leviton’s carbon disclosure project.

8. Compliance with Applicable Laws and Regulations

Our suppliers and the factories in which they manufacture the parts/components/services that are supplied to us, must comply with all applicable laws and regulations, to include but not limited to, all environmental laws and regulations, trade laws and all laws that affect the days to day running of the company, including all laws, regulations and internationally adopted restrictions concerning the bribery and corruption act.

9. Corporate and Social Responsibility

We expect our suppliers to:

9.1 Child labor

Our suppliers must not use child labor. Definition of ‘Child’ is anyone that is younger than 15 years of age (or the legal age for completing compulsory education in the country of manufacture).

9.2 Forced labor

Our suppliers must not use any involuntary or forced labor, including but not limited to: labor acquired through slavery or human trafficking, bonded labor or labor in the form of prison or any other manner where the employee is deprived of their liberty.

9.3 Working hours

Our suppliers must not require their employees, on a regular scheduled basis to work in an excess of 60 hours per week (or fewer hours if this is written in local applicable laws and regulations). All overtime must be voluntary and must be fully compensated in accordance with the requirement of local law. All employees must be entitled to at least one day of rest in a 7 day period.

9.4 Human Rights

Our suppliers must respect the rights of their employees, must treat them with dignity and respect. Leviton will not tolerate any abuse of human rights, including physical, sexual, psychological or verbal harassment.

9.5 Discrimination

All workers of our suppliers must be employed and compensated based on their ability to perform their jobs, and must not be discriminated against because of gender, race, color, age, religious, ethnic and cultural beliefs or any other factors.

9.6 Subcontractors

All our suppliers must ensure that all their subcontractors and any other third party involved in the production or distribution of goods offered to us comply with all the principles described in this code of conducts.

Additionally, our suppliers must disclose to Leviton third-party auditors the names of all subcontractors and third parties before any compliance are scheduled (if applicable).