SUPPLIER CODE OF CONDUCT
Vision

Regularly improving our proprietary technologies and know-how in order to increase the assessment and fulfillment of customer needs, by proposing tailored and leading solutions to meet their goals. Always respecting ethical standards, with a particular attention to territory and environment.
This Supplier Code of Conduct applies to all ATOP suppliers. Suppliers are also required to ensure that their sub-suppliers comply with this code. We wish to influence our suppliers to contribute to a responsible and sustainable development and to demonstrate responsible management of sub-suppliers, as we do. Therefore, we expect our suppliers to actively take responsibility not only for their own actions and activities, but also for their suppliers. It is expected that the suppliers monitor and constantly assess their sub-suppliers portfolio to ensure that standards are maintained. In ATOP, we wish to abstain from purchasing in conflict areas and from undertaking unethical purchasing strategies and we encourage our suppliers to do the same.

Suppliers must inform ATOP if there are conditions prevailing in their own or sub-suppliers’ activities that do not comply with this Supplier Code of Conduct.

We reserve the right to carry out audits, announced in advance, at the suppliers’ premises to verify that the supplier follows the Supplier Code of Conduct. These audits can be performed either by ATOP employees or by third party auditors, chosen by ATOP. In relation to an audit, suppliers shall be prepared to provide ATOP access to all relevant and reasonably required information and documents.
The supplier must protect workers from any form of harassment at the workplace, whether committed by managers or colleagues.
1. **CHILD LABOUR**

The supplier must not be involved in child labour. The minimum age for employment is 15 years (or 14 years where established by national laws).

If allowed by national laws, the supplier may employ children between 12 and 15 years to perform a few hours of light work per day. The work must not interfere with the children's education. Apprenticeship programmes for children below the minimum age of employment must be paid for and clearly aimed at training. The supplier must not hire young workers (below the age of 18) to perform any type of work that could jeopardize their health, safety or morals.

2. **FORCED LABOUR**

The supplier must not participate in, or benefit from, any form of forced or compulsory labour. The workers must have freedom of movement during the course of their employment. The supplier must not withhold the identity cards, travel documents and other important personal papers of its employees, thus preventing the employees from ending their employment.

3. **DISCRIMINATION**

The supplier shall treat everyone with respect and courtesy, not discriminating because of race, gender, language, religion, political or other opinions, caste, national or social origin, property, birth, union affiliation, sexual orientation, health status, family responsibilities, age or disability. The supplier undertakes to respect the basic human rights as set out, for example, in the “Universal Declaration of Human Rights” of the United Nations and in the ILO (International Labour Organization) Declaration of Principles. Hiring, payment, benefits, training, advancement, discipline, dismissals, retirement must be based on objective criteria. The supplier must protect workers from any form of harassment at the workplace, whether committed by managers or colleagues.

4. **RIGHT TO ORGANISE AND COLLECTIVE BARGAINING**

The supplier must recognize the workers’ right to form (where permitted by law) and join unions and to bargain collectively. The workers must be free to elect worker representatives or spokespersons who must have access to employees at the workplace. If only state-authorised organisations are allowed, the supplier should facilitate alternative measures to allow employees to gather independently to discuss work-related matters.

5. **WORKING HOURS, WAGES AND BENEFITS**

The supplier must ensure that the working week is limited to maximum 48 hours. Overtime must be voluntary, not frequent, and not exceed 12 hours per week. Employees are entitled to at least one day off per week, and must be given reasonable breaks during work hours.

The supplier must ensure that workers are paid a decent living wage and at least the minimum wage required under local law and regulations. Overtime should be paid for at a premium rate. Wages must be paid on a regular basis. Deductions from wages should be transparent and must never be used as a disciplinary measure. All workers should have a written, understandable, and legally binding labour contract. The supplier should not rely on part-time, short term or casual labourers, trainees, or false apprenticeships to pay lower wages and fewer benefits. The supplier should grant employees paid holidays and, if required, sick leave every year, as well as parental leave. Women on maternity leave must be free to return to their former employment at the same rate and benefits.
The supplier must ensure compliance with the applicable laws and regulations regarding the protection of the environment.
6. **COMMUNITY IMPACT**

The supplier is expected to take responsibility for its surrounding community. This for example means that the supplier should avoid involvement or complicity in human rights violations in interactions with state security forces. Furthermore, the supplier should not participate in or benefit from improper, forced relocations, and must adequately compensate for legitimate relocations.

The supplier must establish and maintain emergency procedures to prevent all health emergencies and industrial accidents affecting the surrounding community or the environment.

7. **WORK ENVIRONMENT**

The supplier must offer workers a safe and healthy working environment. Adequate health and safety policies and procedures, to support accidents prevention and risk exposure, must be established, implemented and followed.

The supplier must offer employees protective equipment and training necessary to perform their tasks safely.

8. **ANTI CORRUPTION**

The highest standards of integrity are expected in all business interactions and the supplier must comply with all applicable laws and regulations on bribery and corruption.

The supplier must never, directly or through intermediaries, propose, accept or tolerate any form of corruption or illegal payment, whether in the form of money or of products, services or entertainment, offered to any person, company or public official in order to influence the decision-making process in its favour.

The suppliers shall therefore refrain from offering expensive gifts and/or any form of entertainment to ATOP employees in an attempt to influence business decisions.

9. **ENVIRONMENT**

The supplier must ensure compliance with the applicable laws and regulations regarding the protection of the environment. Furthermore, the supplier is expected to actively limit the use of resources as much as possible, covering all activities from raw materials to the products’ end of life. This includes minimizing the use of raw materials, energy, water and chemicals, handling waste in an environmentally responsible way and recycling materials as much as possible.

The supplier is expected to constantly improve its environmental performance throughout the value chain using operational control and supervision and to focus on awareness and training.