

# SUPPLIER AND BUSINESS PARTNER CODE OF CONDUCT

Gruner Automation Asia Pacific Limited | Version 2.0 | March 2026

**Note:** *This document supersedes V1.0 (September 2025).  
Key changes: proportionality preamble added; Clauses 3, 5, 6, 8, 10, and 12 revised for practicality.*

## 1. Purpose and Scope

This Code defines minimum standards for suppliers and business partners to GRUNER Automation Asia Pacific Limited (GRUNER AP), registered in Hong Kong under BRN 61424536. It applies to all tiers of the supply chain and must be flowed down to sub-suppliers.

Where local laws are stricter, suppliers must comply with those laws. Where the law is silent, apply internationally recognized good practice referenced in this Code.

These standards reflect our commitment to responsible business conduct and sustainable growth, ensuring that our supply chain operates with the same integrity and reliability that define our products and services.

**Note:** *Proportionality; GRUNER AP recognizes that suppliers vary significantly in size, structure, and capacity. Certain requirements in this Code admit no flexibility regardless of supplier size — these include the prohibition of child labour, forced labour, and human trafficking; all bribery and corruption prohibitions; sanctions and trade compliance obligations; and product substance regulations. These apply in full to every supplier without exception. Where proportionality applies, it concerns how compliance is implemented and demonstrated — for example, the depth of management systems, documentation formats, or audit mechanisms. A smaller supplier acting in good faith and demonstrating genuine commitment to continuous improvement satisfies the procedural intent of this Code; it does not satisfy clauses where the conduct itself is the requirement.*

## 2. Legal Compliance & Business Integrity

Suppliers must comply with all applicable laws and regulations in the countries where they operate. All business dealings must be conducted with integrity, fairness, and transparency. Bribery, corruption, extortion, embezzlement, and any other improper payments or practices intended to influence decisions or gain an unfair advantage are strictly prohibited. Suppliers shall avoid conflicts of interest, respect fair competition and antitrust laws, and maintain accurate and transparent business records.

**Anti-Money Laundering and Counter-Terrorist Financing (AML/CTF).** Suppliers must maintain AML/CTF controls commensurate with their risk profile, perform customer and transaction due diligence where required, and comply with applicable AML/CTF laws and regulations. Transactions that conceal or misrepresent the origin, ownership, or purpose of funds are prohibited. Suppliers must keep documentation sufficient to evidence compliance and provide it to GRUNER AP on request.

Reference: [UN Convention against Corruption \(UNCAC\)](#) | [Financial Action Task Force \(FATF\)](#)

### 3. Human Rights, Labour & Decent Work

Respect internationally proclaimed human rights. Prohibit any form of forced labour, human trafficking, and child labour. Suppliers shall not charge workers recruitment or placement fees. Where such fees are identified, suppliers must take prompt corrective action, which may include reimbursement, and report the matter to GRUNER AP. Child labour refers to work performed by anyone under the minimum age of employment as defined by ILO Convention 138, and in all cases suppliers must ensure no hazardous work is undertaken by persons under 18 years of age.

Ensure non-discrimination, freedom of association, and the right to collective bargaining; prohibit harassment, intimidation, or abuse. Provide fair wages and comply with applicable working-time laws. Where the law is absent, follow International Labour Organization (ILO) guidance: provide at least one rest day every seven days, and weekly working hours including overtime shall not exceed 60 hours under normal operating conditions.

**Note:** *The 60-hour weekly cap serves as an absolute ceiling. Temporary peaks in seasonal or project-driven businesses are recognized; sustained breach of this limit during normal operations is not acceptable.*

Reference: [UN Guiding Principles on Business & Human Rights](#) | [ILO Convention 138](#)

### 4. Occupational Health & Safety (OHS)

Provide a safe and healthy workplace by identifying and controlling hazards, conducting regular risk assessments, and implementing preventive measures. Train workers to perform their tasks safely and ensure they have the right to refuse unsafe work without retaliation.

Reference: [ISO 45001 – Occupational Health and Safety Management Systems](#)

### 5. Environment & Climate

**Minimum requirements (mandatory):** Comply with all applicable environmental laws and regulations.

Minimize pollution, emissions, and waste, and strive for continuous improvement in the efficient use of energy, water, and materials. Take measures to avoid deforestation and protect biodiversity in operations and supply chains.

**Best-efforts expectations:** Work toward quantifying and managing your direct greenhouse gas (GHG) emissions (Scope 1 and 2). Where GRUNER AP requests emissions data to support its own climate reporting, suppliers should provide available information on a reasonable-efforts basis. Suppliers are encouraged to apply principles of eco-design and circular economy — such as reducing material use, extending product life, or improving recyclability — in line with internationally recognized practices.

**Note:** *GRUNER AP does not require smaller suppliers to produce independently verified Scope 3 carbon inventories at this stage. Suppliers that operate management systems aligned with GHG Protocol or ISO 14001 are encouraged to share relevant data voluntarily.*

Reference: [GHG Protocol – Corporate Standard](#) | [EU Ecodesign for Sustainable Products Regulation \(ESPR\)](#)

### 6. Responsible Sourcing of Minerals & Materials

Exercise due diligence on so-called 3TG minerals — Tin, Tantalum, Tungsten and Gold — as well as other minerals of concern such as cobalt, lithium, and mica. Suppliers shall complete a Conflict Minerals Reporting Template (CMRT) or equivalent recognized declaration form on an annual basis, or upon GRUNER AP's written request. Suppliers must maintain their own due diligence records for a minimum of five years and provide documentation to GRUNER AP on request.

Reference: [OECD Due Diligence Guidance for Responsible Mineral Supply Chains](#) | [RMI Conflict Minerals Reporting Template](#)

## 7. Product & Chemical Compliance

Meet applicable product-substance regulations applicable to the markets where products are sold or used. Key frameworks include REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) and EU RoHS (Restriction of Hazardous Substances Directive 2011/65/EU). Suppliers manufacturing or supplying products into mainland China must also comply with China RoHS — the Administrative Measures for the Restriction of the Use of Hazardous Substances in Electrical and Electronic Products. Disclose all material information needed for compliance upon request.

China's first mandatory national RoHS standard, GB 26572-2025, was published on 1 August 2025 and takes full effect on 1 August 2027. It expands the restricted substance list from six to ten substances (adding four phthalates: DEHP, BBP, DBP, DIBP) and introduces mandatory labeling requirements. The phthalate restrictions under Amendment No. 1 to the previous standard are already in force as of 1 January 2026. Suppliers with products in scope should review compliance readiness ahead of the 2027 enforcement date.

Reference: [EU REACH Regulation](#) | [China GB 26572-2025](#)

## 8. Information Security & Data Protection

Protect all confidential information and personal data obtained or generated in the course of business with GRUNER AP, including data relating to GRUNER AP, our customers, employees, and third parties.

**Minimum controls (all suppliers):** Implement access controls and password policies; restrict access to GRUNER AP data to personnel who require it; use secure transmission methods for sensitive data; and maintain basic network security proportionate to the sensitivity of GRUNER AP data handled.

**Extended requirements (suppliers processing significant volumes of personal data on behalf of GRUNER AP):** Align technical and organizational measures with ISO/IEC 27001:2022 and, where personal data is processed, ISO/IEC 27701:2019. Ensure equivalent safeguards apply to any sub-processors engaged for GRUNER AP work.

Notify GRUNER AP without undue delay and no later than 72 hours after becoming aware of any security incident that affects GRUNER AP data or services, and cooperate on containment and remediation.

Reference: [ISO/IEC 27001:2022 - Information security, cybersecurity and privacy protection](#)

## 9. Trade Compliance & Sanctions

Comply with all applicable export, import, customs, and sanctions laws relevant to the jurisdictions where business is conducted. Screen counterparties and transactions against the UN Security Council Consolidated List and any other sanctions or trade restrictions legally applicable to the transaction. Classify items correctly, obtain required licenses or permits, and do not structure transactions to circumvent applicable laws. Where GRUNER AP specifies additional regimes or restricted-party lists in a contract or purchase order, suppliers must comply with those requirements for that engagement.

Reference: [UN Security Council – Consolidated Sanctions List](#)

## 10. Business Continuity (Resilience)

Maintain basic contingency arrangements to minimize supply disruptions and protect critical operations. At a minimum, suppliers should:

- Identify key production inputs and maintain awareness of alternative sources or buffer arrangements.
- Designate backup contacts and ensure GRUNER AP holds current escalation details.
- Notify GRUNER AP promptly — and no later than 48 hours after becoming aware — of any disruption that may affect contracted delivery timelines.

**Note:** Larger suppliers or those supplying sole-source components critical to GRUNER AP production are encouraged to maintain a documented business continuity plan aligned with ISO 22301. This remains a recommendation for most suppliers, not a mandatory requirement.

Reference: [ISO 22301 – Business Continuity Management Systems \(recommended reference\)](#)

## 11. Grievance, Reporting & Non-retaliation

Suppliers shall provide workers and stakeholders with practical and confidential ways to raise concerns, appropriate to the size and structure of their business. All reports must be treated seriously, without retaliation against the person raising the concern or anyone involved in an investigation. Concerns should be reviewed promptly and fairly, and outcomes communicated where possible. Suppliers are expected to cooperate with GRUNER AP in resolving cases that affect our partnership.

Concerns relating to this Code may be reported directly to GRUNER AP at [info@grunerasiapacific.com](mailto:info@grunerasiapacific.com). GRUNER AP prohibits retaliation against anyone who raises a concern in good faith or participates in an investigation.

Reference: [ISO 37002 – Whistleblowing Management Systems](#)

## 12. Management Systems, Audits & Corrective Action

Suppliers are expected to maintain basic management practices — such as clear policies, defined responsibilities, and worker training — that support compliance with this Code. Maintain records that demonstrate compliance.

**Audit access:** Suppliers shall allow GRUNER AP (or its designated representatives) reasonable access to facilities and documentation for verification purposes. GRUNER AP will provide at least 10 business days' written notice before any scheduled audit, except where specific circumstances require urgent access. Routine audits will not occur more than once per calendar year unless a specific concern is identified during a previous audit that warrants follow-up.

**Corrective action:** Where gaps are identified, GRUNER AP will work with the supplier to agree on a corrective action plan with realistic timelines before considering any effect on the sourcing relationship. Continued material non-conformance without good-faith effort to improve may ultimately affect sourcing decisions.

## 13. Cascading Requirements

Suppliers are expected to share the principles of this Code with their own suppliers and business partners. While we recognize that smaller companies may not have the same capacity as large multinationals, suppliers should take reasonable steps to promote these standards in their supply chains and address any serious issues that come to their attention. GRUNER AP encourages the use of recognized certifications or independent audits for sub-tier suppliers where practical. Where such formal mechanisms are not feasible, suppliers should apply proportionate measures — such as communicating expectations clearly and engaging directly with key partners. GRUNER AP may request information on how suppliers manage significant risks at sub-tier levels where relevant to our partnership.

## Acknowledgement

By supplying to GRUNER AP, the Supplier confirms it understands and will adhere to this Code and will support reasonable verification upon request.

Supplier/Business  
Partner Name:

*Company Stamp*

Authorized  
Signature:

Full Name of Signee:

Title / Function:

Date:

For questions regarding this Code, contact: [info@grunerasiapacific.com](mailto:info@grunerasiapacific.com)

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