



# THE WEST GROUP LIMITED

## Design & Supply of Fluid Control Solutions & Components

Aston Road, Waterlooville, Hants, England. PO7 7XJ

Tel: +44 (0)23 9226 6031 Fax: +44 (0)23 9224 0323  
Email: sales@westgroup.co.uk www.westgroup.co.uk  
Company Reg No. 127 39 71 VAT Reg No. GB 339 1517 53

### **The West Group Ltd Code of Conduct for the Attention of our Suppliers and Customers**

## **1. INTRODUCTION**

The West Group Ltd is committed to acting in the highest standards ethically and responsibly in all areas of its business practices.

We are confident that our Business Conduct Principles encompass and adhere to the 10 Principles of the UN Global Compact Incorporating Human Rights, Labour, Anti-Corruption and the Environment. In addition, the requirement to comply with Conflict Materials regulations and Employee Health & Safety are captured. (refer to Footnote 4.1. for a comprehensive list of referenced regulations).

## **2. BUSINESS CONDUCT PRINCIPLES**

- 2.1. Provide a workplace free from discrimination, harassment or abuse and treat employees fairly in line with employee legal requirements, regardless of race, age, religion, disability, age, sexual orientation or gender.
- 2.2. Forbid all form of forced, compulsory or child labour. Compliance to the UK legal minimum employment age limit and ILO fundamental conventions, including the employee rights to Freedom of association.
- 2.3. Anti-Slavery - Although The West Group is not legally bound by the commercial organisation requirements in Section 54 (transparency in Supply Chains) of The Modern Slavery Act 2015, we are committed to a work environment that is free from Human Trafficking and Slavery.
- 2.4. Be mindful of corruption in all its forms, including extortion and bribery and comply with applicable anti-bribery laws.
- 2.5. Compliant with all applicable laws and guidance in relation to Conflict Materials in our manufacturing process
- 2.6. Ensure, as is reasonably practical, the health, safety and welfare of all employees working for the company and other persons who may be affected by our undertakings.
- 2.7. Commit to preventing pollution and to complying with all relevant environmental legislation, regulations and other environmental requirements. We will regularly evaluate the environmental impact of our activities, products and services.
- 2.8. Ensure compliance with applicable export control regulations and consideration to the UK Trade & Investment published guidance.

## **3. GDPR PRIVACY NOTICE**

- 3.1. The West Group Seller holds personal data about employees, clients, suppliers and other individuals for a variety of business purposes and must process this data (including sensitive personal data) so that it can provide the required services for the Buyer. In doing so, the Seller acts as a data controller and processor.
- 3.2. The West Group will process personal data in compliance with all six data protection principles which can be found at <https://ico.org.uk/for-organisations/guide-to-data-protection/data-protection-principles/>
- 3.3. Any concerns should be addressed in writing to the Seller: The West Group Limited of 29 Aston Road, Waterlooville, Hampshire, UK. PO7 7XJ



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## 4. FOOTNOTES

- 4.1. As a UK company, we acknowledge the following in support of our Business Conduct Principles:
- 4.1.1. United Nations Universal Declaration of Human Rights
  - 4.1.2. The 10 principles of the UN Global Compact
  - 4.1.3. The UK Modern Slavery Act 2015
  - 4.1.4. The UK Equality Act 2010
  - 4.1.5. International Labour Organisation (ILO) Fundamental Conventions
  - 4.1.6. The UK Bribery Act 2010
  - 4.1.7. The International Chamber of Commerce (ICC) Trade Tools
  - 4.1.8. The Organisation for Economic Co-operation and Development (OECD) Responsible Supply Chains Guidance
  - 4.1.9. Section 1502 - Dodd-Frank Wall Street Reform and Consumer Protection Act 2010 (Conflict Minerals)
  - 4.1.10. UK Health and Safety at Work etc. Act 1974
  - 4.1.11. US Foreign Corrupt Practices Act
  - 4.1.12. The Employment Rights Act 1996; The Employment Acts 2002 and 2008
- 4.2. Whilst we expect that our associated Business Partners and their supply chain also share our commitment to these standards and comply with all applicable laws and regulations in the country(ies) in which they operate, The West Group is unable to exercise full diligence in verifying their full compliance.

**Signed By:**

Stuart Barnett  
Managing Director  
The West Group Ltd