

Middlecon Supplier Code of Conduct

Introduction

At Middlecon, we are committed to building strong and sustainable relationships with our suppliers. We expect our suppliers to share our values and adhere to the highest standards of ethical business practices, environmental responsibility, and human rights. This Supplier Code of Conduct sets out the principles and minimum standards that we require our suppliers, and their subcontractors, to uphold in their business operations.

Suppliers must ensure compliance with this Code throughout their supply chains. Failure to comply may result in the termination of business relationships. Regular audits may be conducted to verify adherence to these standards.

1. Compliance with Laws and Regulations

Suppliers shall comply with all applicable laws, regulations, and industry standards in the countries where they operate. This includes, but is not limited to, laws concerning labor, health and safety, environmental protection, and fair trade. Suppliers must maintain all required permits and licenses and act in full compliance with local and international laws.

2. Human Rights and Labor Standards

Suppliers must respect and protect human rights as outlined in the Universal Declaration of Human Rights and the International Labour Organization (ILO) standards. This includes:

2.1 Prohibition of Forced Labor:

All forms of forced, bonded, or compulsory labor are prohibited. Workers must have the freedom to leave their employment after giving reasonable notice, and their movements or documents must not be restricted.

2.2 Child Labor:

Suppliers must comply with the minimum working age laws in each country where they operate. No child under the age of 15, or higher where mandated by local law, shall be employed. For hazardous work, the minimum age should be 18.

2.3 Wages and Benefits:

Suppliers must provide wages that meet or exceed the legal minimum standards. Workers must be provided with clear information about their compensation, and unlawful deductions are strictly prohibited.

2.4 Working Hours:

Suppliers must comply with national laws governing working hours and ensure that overtime is voluntary, paid in accordance with legal requirements, and does not replace regular employment.

2.5 Freedom of Association and Collective Bargaining:

Suppliers must respect the rights of employees to form and join trade unions and to bargain collectively, without fear of retaliation or harassment.

2.6 No Discrimination:

Suppliers must ensure that employees are hired, compensated, trained, and promoted based on their abilities and performance, without discrimination based on race, color, gender, religion, nationality, sexual orientation, disability, or any other characteristic protected by law.

2.7 Safe Working Conditions:

Suppliers must provide a safe and hygienic working environment. This includes regular risk assessments, the provision of appropriate personal protective equipment (PPE), and training on occupational health and safety. Suppliers should also implement measures to prevent accidents and injuries related to workplace hazards.

3. Environmental Responsibility

We expect our suppliers to recognize the importance of environmental sustainability and to act in accordance with international environmental standards. This includes:

3.1 Environmental Management System:

Suppliers should have an effective environmental management system in place to continuously assess and mitigate environmental risks and impacts.

3.2 Resource Efficiency:

Suppliers must make efforts to minimize resource consumption, particularly energy, water, and raw materials. Where possible, renewable resources and sustainably sourced materials should be used.

3.3 Emissions and Waste Management:

Suppliers must control and minimize emissions to air, water, and soil, as well as manage waste responsibly. Hazardous waste must be handled, stored, and disposed of in compliance with all relevant regulations.

3.4 Climate Change Mitigation:

Suppliers should take steps to reduce greenhouse gas emissions and actively contribute to climate change mitigation through sustainable practices and innovation.

3.5 Supplier Accountability:

Suppliers should evaluate the environmental performance of their own supply chain and ensure that their vendors also comply with minimum environmental standards.

4. Business Integrity and Ethics

Middlecon requires the highest standards of business integrity and ethical conduct. Suppliers must:

4.1 Anti-Corruption and Bribery:

Suppliers shall not engage in any form of corruption, extortion, embezzlement, or bribery, including the offering or receiving of improper benefits to secure a business advantage.

4.2 Fair Competition:

Suppliers must comply with all applicable antitrust and competition laws. They must not engage in price-fixing, market allocation, or other unfair trade practices.

4.3 Confidentiality:

Suppliers must protect confidential information relating to Middlecon and its business partners. Such information should only be used for the purpose it was provided with and should not be shared with third parties without proper authorization.

4.4 Conflicts of Interest:

Suppliers must avoid situations where personal, financial, or other interests conflict with the best interests of Middlecon. Any potential conflicts must be disclosed promptly.

4.5 Intellectual Property:

Suppliers shall respect the intellectual property rights of Middlecon and third parties. All products and services must be provided without infringing upon these rights.

5. Diversity and Inclusion

We believe in fostering diversity and inclusion within our supply chain. Suppliers must:

5.1 Non-Discrimination:

Suppliers shall provide equal opportunities to all employees, regardless of gender, race, ethnicity, age, disability, religion, sexual orientation, or other protected characteristics.

5.2 Inclusive Workforce:

Suppliers are encouraged to actively promote diversity in their workforce and ensure that all employees are treated with respect and dignity.

5.3 Supplier Diversity:

Suppliers should make efforts to engage diverse subcontractors and vendors, including those owned by minorities, women, veterans, or individuals with disabilities.

6. Monitoring and Compliance

6.1 Audits:

Middlecon reserves the right to conduct audits, either directly or through third parties, to ensure compliance with this Supplier Code of Conduct. Suppliers must provide access to relevant documents and facilities as part of this process.

6.2 Corrective Action:

In the event of non-compliance, suppliers will be required to take corrective actions. Repeated or serious violations may result in the termination of the business relationship.

6.3 Reporting Violations:

Suppliers and their employees should feel empowered to report any suspected violations of this Code without fear of retaliation. Middlecon provides a confidential hotline and reporting mechanism to address ethical concerns.

7. Continuous Improvement

Middlecon expects its suppliers to continuously improve their social, environmental, and ethical performance. This includes implementing best practices and participating in initiatives that support long-term sustainability.

Conclusion

We are committed to building mutually beneficial relationships with our suppliers, based on trust, respect, and shared values. Compliance with this Supplier Code of Conduct is a critical element of this relationship, and we look forward to working with suppliers who are equally committed to responsible business practices.

