


ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021



Enerpac Tool Group Supplier Code of Conduct

Procedure

Intellectual Property Category:				
	1	2	3	4

4 - UNRESTRICTED - Free distribution to all parties

2.0	Jan 2021	Mark Boardman	Mark Boardman	Quality Steering Committee
1.0	Aug 2020	Mark Boardman	Mark Boardman	Quality Steering Committee
Rev No	Rev Date Month/Year (MM/YYYY)	Prepared (Initial, surname and department)	Approved (Doc Owner(s)) (Initials, surnames and departments)	Approved HSSEQ (Initial, surname, dept)

©2019 Enerpac. Copyright in this document belongs to Enerpac national legal entity (Ltd, Pte, GmbH etc...) and all rights are reserved. No reproduction of all or part of this document shall be made without the prior written consent of Enerpac.



ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

Table of content

1	Purpose and Scope	3
2	Our Commitment to Our Suppliers	3
3	Our Expectations of Enerpac Suppliers.....	3
	3.1 Terms of Engagement	3
	3.2 Laws, Regulations and Contractual Obligations.....	3
	3.3 Labor Practices and Human Rights	4
	3.3.1 Freely Chosen Employment	4
	3.3.2 No Child Labor.....	4
	3.3.3 Non-Discrimination	4
	3.3.4 Respect and Dignity	4
	3.3.5 Labor Laws	4
	3.4 Health, Safety and Environmental (HSE) Practices.....	5
	3.4.1 Safety Standards	5
	3.4.2 Safety Training.....	5
	3.4.3 Environmental Laws and Sustainability	5
	3.4.4 Health Safety & Environmental (HSE) Management Systems.....	5
	3.5 Fair Business Practices	6
	3.5.1 Conflicts of Interest.....	6
	3.5.2 Bribes and Corruption.....	6
	3.5.3 Gifts and Entertainment.....	7
	3.5.4 Insider Trading.....	7
	3.5.5 Fair Competition	7
	3.5.6 Export/Import Controls and Trade Regulation	7
	3.5.7 Business Records.....	7
	3.5.8 Confidentiality, Information Security & Intellectual Property.....	7
	3.6 Conflict Minerals and Raw Material Procurement	8
	3.6.1 Raw Materials	8
	3.6.2 Conflict Minerals	8
4	RIGHT TO AUDIT, MONITOR AND TERMINATE	8
5	REPORTING CONCERNS.....	9
6	Revision History.....	10

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

1 Purpose and Scope

At Enerpac Tool Group Corp. (“Enerpac”), our actions and achievements are guided by our core values, which we aim to exemplify every day; we believe our values are the source of our long-term success. Safety and integrity, customer focus, collaborative relationships, meeting our commitments and supporting our employees and communities are at the heart what we do, what we stand for, and what we expect in our business relationships.

Because our values are fundamental to the way we operate, we expect our suppliers and their employees, agents and subcontractors (which we collectively refer to as “Suppliers”) to adhere to this Enerpac Tool Group Supplier Code of Conduct. This Supplier Code of Conduct highlights the basic principles of conduct Enerpac requires its Suppliers to meet throughout our business relationships. Enerpac’s senior management has adopted this Supplier Code of Conduct to cascade and reinforce our company values and operating principles throughout our supply chain.

2 Our Commitment to Our Suppliers

At Enerpac Tool Group our goal is to partner with Suppliers to deliver value-for-cost procurement for the Group and our customers, and to demonstrate responsible supply chain management. To this end, we have set out our expectations of our Suppliers in this Supplier Code of Conduct and will work with them to ensure that these expectations are met. Questions regarding these expectations should be directed to the Global Procurement team at (920) 623-7049.


3 Our Expectations of Enerpac Suppliers

3.1 Terms of Engagement

All Enerpac Suppliers must undergo a rigorous qualification process prior to engagement with Enerpac. This qualification process includes an assessment of the Supplier’s current compliance with the requirements of this Supplier Code of Conduct and their commitment to maintaining compliance with it. Existing Suppliers may be audited for compliance with this Supplier Code of Conduct as a condition of continuing to do business with Enerpac.

3.2 Laws, Regulations and Contractual Obligations

At a minimum, Suppliers must perform all duties, services and contractual obligations in compliance with all local, national and international laws and regulations applicable to their business. Further, Suppliers must comply with the terms, conditions and other provisions specified in their contract or agreement with Enerpac, or in the Enerpac purchase order. This Supplier Code of Conduct forms part of, and is incorporated in, the contracts and agreements with Enerpac and its purchase orders.

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

3.3 Labor Practices and Human Rights

At Enerpac, we believe everyone should be treated with dignity and respect. This belief applies not only to our employees but to our Suppliers' employees as well. Accordingly, we require our Suppliers to adhere to all appropriate labor laws and regulations, as well as the conventions of the International Labor Organization (ILO), the Universal Declaration of Human Rights, and the United Nations Guiding Principles on Business and Human Rights, in order to preserve and safeguard human rights. Suppliers must implement and maintain policies, procedures and systems that ensure the following requirements are met within their operations and throughout their supply chains:

3.3.1 Freely Chosen Employment

All Supplier employment must be freely chosen. Forced or bonded labor, human trafficking, forced prison labor, or involuntary labor through threat, force, coercion, confiscation of government identification, or fraudulent claims are all strictly prohibited.

3.3.2 No Child Labor

Suppliers must not use child labor (as defined by local law). Suppliers must only use employees that are at or above the minimum legal age for employment in each country where they operate. Suppliers will avoid employment that may be mentally, physically, socially, or morally dangerous to children, or that interferes with their schooling. Work which by its nature or as a result of the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons may not be entrusted to anyone under the legal minimum age of the country in question.

3.3.3 Non-Discrimination


Enerpac requires that Suppliers treat their existing and prospective employees fairly, and prohibit discrimination, harassment or intimidation on the basis of race, color, descent, religion or belief, political opinion, national or ethnic origin, nationality, sex, pregnancy, age, disability, health, physical or genetic characteristic, sexual orientation, gender identity, marital status, military service, membership in a union or any other status protected by law.

3.3.4 Respect and Dignity

Suppliers must treat all employees with respect and dignity and should actively deter and prohibit any form of corporal punishment, threats of violence, verbal, physical, or visual abuse, or other form of mental, sexual, or physical coercion or harassment.

3.3.5 Labor Laws

Providing a decent wage and appropriate work hours is vital to respecting employees. Suppliers must comply with all applicable labor laws (including any applicable collective bargaining agreements), particularly those related to wage, vacation and working hour regulations, as well as those in relation to the occupation of foreign workers, the use of such workers or providing workers to third parties. Suppliers must honor their employees' rights to freedom of association and respect their rights to collectively bargain within the confines of national laws and regulation.

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

3.4 Health, Safety and Environmental (HSE) Practices

At Enerpac, we take responsibility for keeping our employees and co-workers safe and secure in the workplace and for applying the same standard of care to contractors and visitors on our sites. We expect that Suppliers also implement safe work practices and take reasonable precautions to promote the safety of their employees, contractors and visitors and, at a minimum, comply with all applicable HSE regulatory requirements.

3.4.1 Safety Standards

Suppliers must make efforts to institute best practices with respect to safe working environments. These environments will fully comply with all safety and health laws, regulations, and practices, including those applicable to the areas of occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding and sanitation. Appropriate steps must be taken to eliminate hazardous conditions in the workplace.

3.4.2 Safety Training


Suppliers should provide adequate training for employees and contractors on applicable local workplace safety practices. Such practices should be designed to help prevent accidents and injuries and comply with the requirements outlined in the previous section.

3.4.3 Environmental Laws and Sustainability

- 3.4.3.1 Suppliers must comply with all applicable environmental laws and regulations regarding hazardous materials, waste and wastewater discharges, air emissions and other environmental matters.
- 3.4.3.2 Enerpac is committed to minimizing the environmental impact of our operations. We expect our Suppliers to share this commitment through continuous improvement in impact measurement and monitoring, and implementation of environmentally sound processes and procedures.

3.4.4 Health Safety & Environmental (HSE) Management Systems

Enerpac requires Suppliers to have an effective HSE management system in place at all times during their business relationship with Enerpac. Certification to ISO 14001 and ISO 45001 by a third party satisfies this requirement. In the absence of third-party certification, Suppliers must demonstrate effective implementation of the following minimum requirements outlined in our Supplier Quality Manual (SQM):

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

- 3.4.4.1 An HSE policy that includes a commitment to continuous improvement, hazard elimination, reducing occupational health and safety risks, compliance with environmental protection regulations and pollution prevention, that has been established and communicated to all employees;
- 3.4.4.2 Identification and documentation of the environmental aspects of the Supplier's operations and their associated environmental impacts;
- 3.4.4.3 Identification and documentation of the occupational hazards of the Supplier's operations and their associated risks;
- 3.4.4.4 Establishment of HSE goals and objectives directly related to reducing occupational hazards, risks and environmental impact;
- 3.4.4.5 Establishment of programs to achieve HSE goals and objectives; and
- 3.4.4.6 Establishment, monitoring and review of HSE metrics by business leaders to ensure HSE objective and goals are achieved.

Additional information on Enerpac's SQM and associated HSE Requirements is available upon request from Enerpac's Global Procurement team.

3.5 Fair Business Practices


At Enerpac, we compete energetically and honestly for business. We succeed on the strength of transformative ideas and technology that bring value to customers, and never through inappropriate conduct in the marketplace. We require our Suppliers to maintain the same ethical business standards of operation.

3.5.1 Conflicts of Interest

Suppliers should avoid conflicts of interest, or even the appearance of a conflict of interest. A conflict of interest occurs when an individual has a personal interest or is involved in an activity that could interfere with such person's ability to perform tasks in an objective, impartial and effective manner. Suppliers must report to Enerpac all actual, potential or apparent conflicts of interest with Enerpac or its employees or representatives prior to entering into any business transaction

3.5.2 Bribes and Corruption

Enerpac conducts its business free from extortion, bribery, and all unlawful, unethical or fraudulent activity. Enerpac employees will not directly or indirectly offer bribes, kickbacks or any similar payment, nor promise any other improper benefit to any customer, supplier, public official or any other person that could influence them in performing their duties properly and without bias. Enerpac employees will not accept bribes, kickbacks or any similar payment. In addition, our Suppliers must follow all applicable anti-corruption laws and regulations. All forms of bribery, kickbacks, corruption, extortion, or embezzlement are prohibited. Suppliers are also expected to institute adequate procedures to prevent bribery and corruption within their own operations at all global locations.

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

3.5.3 Gifts and Entertainment

Suppliers should be wary of attempting to give gifts to Enerpac employees and agents. Even well-intentioned gifts may constitute a bribe in certain circumstances or create conflicts of interest. Suppliers should not offer anything of value in order to obtain a benefit or advantage and must not offer anything that might appear to influence, compromise the judgment of, or obligate an Enerpac employee.

3.5.4 Insider Trading

Suppliers must ensure that non-public information obtained over the course of their relationship with Enerpac is not disclosed or used for the personal benefit of Supplier's business partners, their employees or others.

3.5.5 Fair Competition

Suppliers must not engage in collusive bidding, price fixing, price discrimination, or other unfair trade practices in violation of fair competition laws or antitrust laws that govern their jurisdiction. Suppliers must not share or exchange price, cost or other competitive information with respect to any proposed, pending or current procurement by Enerpac.

3.5.6 Export/Import Controls and Trade Regulation


Suppliers will comply with all applicable laws and regulations governing the import, export and re-export requirements and restrictions of domestic and foreign origin parts, components and related technical data. Suppliers must not do business with any person or entity restricted by applicable law or participate in any unlawful boycott.

3.5.7 Business Records

Suppliers must honestly and accurately keep records of all pertinent business information and comply with all applicable laws regarding their completion and accuracy. Accounting records must, in reasonable detail, accurately and fairly reflect transactions, assets, liabilities, revenues and expenses. Participation in money laundering or the financing of terrorists or criminal activities in any way is strictly prohibited.

3.5.8 Confidentiality, Information Security & Intellectual Property

3.5.8.1 Suppliers must respect the intellectual and other property rights of Enerpac and other third parties including all patents, trademarks, copyrights and trade secrets. In particular, Suppliers will protect and responsibly use the physical and intellectual assets of Enerpac when given permission to use said assets. Suppliers may only use Enerpac information for authorized purposes in accordance with any nondisclosure or other agreement and applicable law.

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

3.5.8.2 Suppliers are responsible to maintain adequate data protection controls and ensure that Enerpac data is not intentionally or unintentionally disclosed to unauthorized third parties. Sensitive, confidential and proprietary Enerpac data must be encrypted when stored on Suppliers' servers, desktops and laptops. The server areas where Enerpac data is stored must be restricted only to Supplier personnel with a need to know such data in order to fulfill Supplier's obligations to Enerpac. At a minimum, Suppliers' data protection controls must include the following: use of current, reputable anti-virus software for all servers, desktops and laptops; robust password controls; maintenance of Wi-Fi and network security protocols (i.e. strong encryption); and sufficient data recovery processes to recover from IT outages within a commercially reasonable timeframe. Further, it is the responsibility of all Suppliers to provide cyber security training to their employees on a recurrent basis and to maintain IT and information security logs for a minimum of 6 months.

3.6 Conflict Minerals and Raw Material Procurement

3.6.1 Raw Materials


Suppliers should ensure that their procurement of resources is lawful and responsible. To this end, Suppliers should avoid procurement and utilization of any raw materials that were obtained unethically or illegally.

3.6.2 Conflict Minerals

Our Suppliers must exercise reasonable and diligent efforts to determine if their products contain conflict minerals (tin, tantalum, tungsten and gold). If so, we expect all Suppliers to implement supply chain due diligence processes to identify the sources of these minerals, and to support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries. Further, Suppliers are obligated to disclose the origin or source of their material resources annually and upon request of Enerpac.

4 RIGHT TO AUDIT, MONITOR AND TERMINATE

Because we value these principals, Enerpac reserves the right to verify our Suppliers' compliance with this Supplier Code of Conduct through audits or other monitoring activity. In the event Enerpac becomes aware of any actions or conditions that violate our Supplier Code of Conduct, we will request that appropriate corrective actions be taken. If appropriate corrective actions are not taken within a reasonable time period, at Enerpac's sole discretion, Enerpac reserves the right to terminate any business relationship between it and the Supplier for breach, without judicial intervention and without any indemnity from Enerpac being due.

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

5 REPORTING CONCERNS

5.1 We encourage active reporting by our Suppliers of any ethical, legal or safety concerns or potential violations, whether related to this Supplier Code of Conduct or generally arising from Supplier relationships with Enerpac. Suppliers are responsible for promptly informing their Enerpac contact when any situation develops that causes the Supplier to operate in violation of the law or this Supplier Code of Conduct. And, because we hold ourselves to these principles as well, we encourage you to report any perceived violations involving Enerpac employees. Suppliers who believe that an Enerpac employee, or anyone acting on behalf of Enerpac, has engaged in illegal or improper conduct, should report the matter to Enerpac without fear of any negative impact on the business relationship.

5.2 Suppliers and any individual employee of a Supplier can confidentially report their concerns to Enerpac's hotline or its Legal and Compliance department via phone, web, or email 24 hours a day, seven days a week.

5.2.1 To Connect to the hotline by Phone: If calling from the United States or Canada dial 1-866-384-4277; from outside the United States the number is 1-503-478-0655.

5.2.2 To Connect to the hotline through the Web: www.ethicspoint.com

5.2.3 Other Ways to Connect:

Suppliers may also contact the Enerpac Legal and Compliance department in either of the following ways:

Phone: 1-262-293-1620 to reach the Legal and Compliance department's Chief Compliance Counsel


Email: compliance@enerpac.com

Mail:

**Enerpac Tool Group Corp.
Attention: Legal and Compliance Department
N86 W12500 Westbrook Crossing
Menomonee Falls, Wisconsin 53051
United States**

5.3 Subject to applicable law, Enerpac will maintain confidentiality of all reports to the extent possible. Enerpac will not tolerate any retribution or retaliation taken against any individual who has, in good faith, sought out advice or reported questionable behavior or a possible violation of this Supplier Code of Conduct.

5.4 Note to individuals covered by EU data protection laws: In the framework of reporting or investigating concerns under this Supplier Code of Conduct, personal data may be made available to service providers or other Enerpac entities or personnel based in other countries, which may not be part of the EEA. The Company will take appropriate measures to ensure that such transfers comply with the EU data protection requirements.

ENERPAC 	Title: Enerpac Tool Group Supplier Code of Conduct		Global
	Doc number: P-PUR-30591	Revision: 2.0	Date: Jan 2021

6 Revision History

Rev No	Reason for change
1.0	Created and released
2.0	Brand Image Change