THE FACTORY AUTOMATION COMPANY

# **FANUC**

# **FANUC EUROPE**

# SUPPLIER CODE OF CONDUCT



Last revision: July 2025

# FANUC Europe Supplier Code of Conduct

## Our mission

The success of FANUC has been built on the foundation of **our corporate core principles: integrity, transparency, and a deep sense of responsibility** towards the world we live in and the communities we serve.

We firmly believe that our suppliers are our partners in this collective journey towards a more responsible, sustainable, and ethical world. We have established our Supplier Code of Conduct ("Code") to promote this Corporate Social Responsibility throughout our entire supply chain.

We expect our partners to share our vision and foster together a culture of responsible business conduct, sustainability, and ethical excellence.

The success of our mission relies on collective efforts, and we look forward to preserving long-term relationships built on trust, respect and shared values.

Thank you for joining us on this journey.

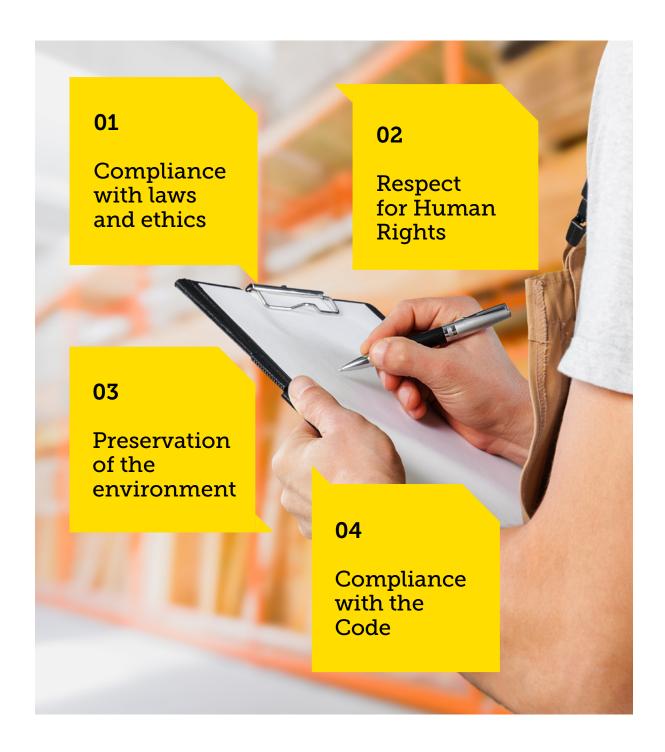
Marco Ghirardello

President & CEO European Management

Frank Baur

Head of Purchasing Europe

# As a Supplier, You hereby declare as follows:



# Compliance with laws and ethics

FANUC is committed to a strict compliance with all applicable laws, rules and regulations and believes that this compliance is the cornerstone of any trustworthy business.





# FANUC expects You to adhere to the following standards:

**1.1** 

# Laws and Regulations

Always abide and respect all laws and regulations.

1.2

# **Integrity**

Fully comply with requirements of all applicable bribery and anticorruption legislation. Do not offer or accept any gift aiming to obtain any unfair advantage or that could be considered inappropriate or lavish.

1.3

# Financial Responsibility

Maintain clear, accurate and transparent financial records in accordance with applicable law and standards. Operate with financial integrity, avoid fraudulent practices, and ensure timely payments to their employees, partners and authorities.

**1.4** 

# **Conflict of Interest**

Take all necessary steps to avoid potential or apparent conflict of interest and promote transparent and impartial business decisions. **1.5** 

# **Fair Competition**

Adhere to applicable antitrust and competition laws. Maintain fairness and competitiveness in business dealings and avoid any behaviour that could lead to any form of agreements, dealings or discussions that could attempt against such rules.

1.6

# Data Protection and Privacy

Have or deploy robust measures to ensure the security and integrity of all forms of data, including intellectual property, confidential information, and personal data.

1.7

# **Trade Compliance**

Know and understand all obligations related to Export Control and Trade Compliance regulations that affect your business and put in place all internal measures required to ensure You strictly adhere to them.

1.8

# Product Authenticity and Anti-counterfeiting

Ensure the authenticity of all goods, parts, and materials supplied to FANUC.



# Respect for Human Rights

FANUC believes that creating an environment that provides equal opportunities, embraces diversity and inclusivity, while adopting a zero-tolerance policy towards discrimination, harassment, or any form of abuse are essential.





# FANUC expects You to share those values, especially observe the following:

## 2.1

# **Employment Laws**

Comply with all applicable laws and international labour standards, including regulated working hours, overtime and hiring practices. Respect internationally recognised human rights standards and comply with all applicable laws prohibiting modern slavery, forced labour, child labour and human trafficking in their operations and supply chains.

## 2.2

# **Child Labour**

Have a zero-tolerance approach towards any form of child labour and act in compliance with all laws regulating minimum working age for each position.

# 2.3

# **Fair Remuneration**

Ensure that compensation is based on performance, equitable and compliant with locally applicable minimum wage laws and regulations.

# 2.4

# **Collective Labour Rights**

Respect freedom of association and the right to collective bargaining.



### 2.5

# Health and Safety

Comply with all applicable health and safety laws and regulations. Ensure a safe workplace for all workers, providing required personal protective equipment as well as adequate training and instructions.

## 2.6

# **Diversity and Inclusion**

Create a diverse and inclusive working environment in which individuals can make best use of their skills and bring ideas and innovations. This working environment must be free from any kind of discrimination based on, but not limited to, race, colour, gender, religion, nationality, sexual orientation, age, or disability.

## 2.7

# **Human Rights**

Prohibit any form of harassment, bullying, intimidation, violence, or abuse through robust internal and properly enforced policies. Provide mechanisms for employees to report any form of such violations without fear of retaliation.

# 2.8

# **Protection of Local Communities**

Respect the rights of individuals and communities related to land, forests and water. Engage in lawful and responsible land use, ensuring the protection of ecosystems that support local livelihoods.

# 2.9

# **Use of Security Forces**

When outsourcing premises security services, suppliers must ensure that the selected provider adheres to internationally recognised human rights standards.



# Preservation of the environment

Based on the company basic vision of "leaving nature and resources to posterity", FANUC is dedicated to minimising the environmental impact of its operations. This commitment includes reducing  $\mathrm{CO}_2$  emissions and energy consumption, using resources such as water and minerals efficiently, and ensuring the proper disposal and reduction of waste. FANUC also recognises the importance of biodiversity as well as animal welfare and encourages practices that protect ecosystems and ethical treatment of all animals.





# FANUC shares this ambition to achieve global environmental conservation together with its Suppliers and expects You to:

## **3.1**

# **Environmental Regulations**

Comply with all applicable environmental regulations and fulfil all standard requirements from international conventions.

### 3.2

# Sustainable Purchasing

Promote through robust purchasing methods the 4R concept (Refuse, Reduce, Reuse, and Recycle) when sourcing goods and services.

### **3.3**

# Water, soil and air

Do not cause or contribute to soil degradation or air and water pollution in violation of applicable environmental laws and regulations. Develop efficient and responsible use of water resources. Adopt best practices in waste management, chemical handling, land use, and noise control to minimise environmental impact.

### **3.4**

# Greenhouse Effect Gases

Actively pursue the reduction of greenhouse effect gases through energy conservation and the use of renewable energy.

## 3.5

# Chemical Substances

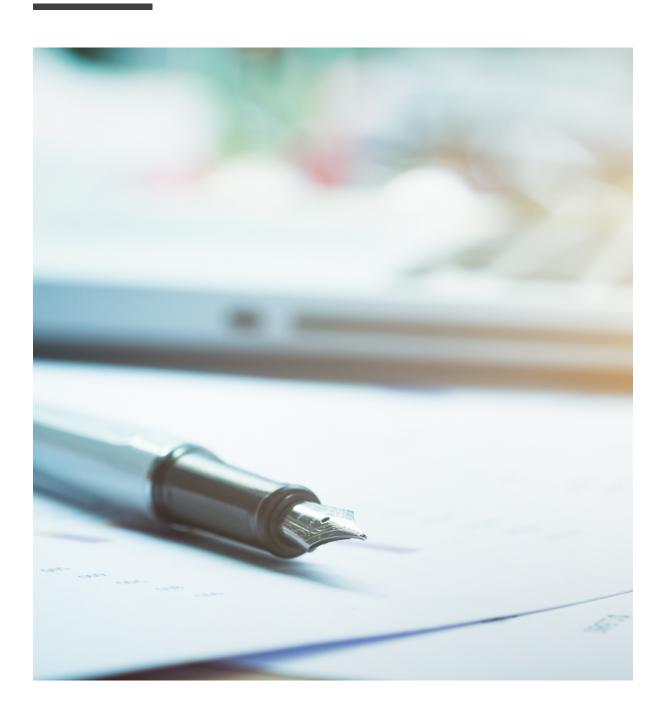
Enhance control over the use of chemical substances, minimising the use of hazardous substances to prevent environmental pollution.

## 3.6

# **Biodiversity**

Actively support the conservation of our natural environment and our biodiversity.

# Compliance with the Code





## 4.1

# **Applicability**

FANUC expects all employees, personnel, agents, and subcontractors of its Suppliers to comply with and respect the Code.

## 4.2

# **Awareness and Monitoring**

To ensure compliance with the Code, FANUC requires its Suppliers to implement certain key actions. These include regular training sessions to raise awareness and understanding of the Code's requirements among its employees, personnel, agents, and subcontractors, as well as regular monitoring of compliance, which helps to identify any potential issues and take prompt corrective action.

# 4.3

# Report

You are expected to report timely to FANUC any legal violations or breach of this Code, independently of the geographic location of the occurrence and/or its impact on any of the services or products provided to FANUC. You may report this to your FANUC person of contact, FANUC Europe Compliance department (compliance@fanuc.eu) or using the whistleblowing portal accessible here.

# 4.4

# **FANUC's Rights**

Although FANUC expects its Supplier to self-assess and continuously strengthen their adherence to the Code, FANUC reserves the right to request documents, policies, questionnaires or perform audits to verify such adherence. In general terms, the kind of evidence that FANUC may request from its suppliers is a proven record of training and awareness materials addressed to your employees, an effective Compliance monitoring system, the existence of internal reporting systems, interviews, surveys and other related documents and materials.



# 4.5

# **Breach**

This Code must be considered an integral part of the business relationship between FANUC and its Suppliers. Therefore, in case of a severe breach in the commitments contained herein, FANUC reserves the rights to take appropriate actions, including termination of the business relationship if appropriate.

# 4.6

# Hierarchy of the Code

The Code is not meant, and does not, supersede any applicable laws or regulations or any specific terms part of an agreement between FANUC and the Supplier.

## 4.7

# **Consideration of the Supply Chain**

You will apply the principles of this Code when selecting sub-suppliers.

By signing this document, the Supplier confirms to comply with the above-mentioned principles:	
Place, date	Name and Position
Company name & stamp	Signature

Seeking guidance on any aspect of this Code? Please contact: compliance@fanuc.eu