



H.B. Fuller

H.B. Fuller Company
1200 Willow Lake Boulevard
St. Paul, Minnesota 55110-5101
Office: (651) 236-5900

To: H.B. Fuller Suppliers
From: Rob Hubbard, Director - Global Strategic Sourcing
Re: Supplier Expectations

Dear Valued Supplier,

At H.B. Fuller Company, we take pride in maintaining high standards of ethical conduct and in complying with the wide range of laws and regulations governing our business. We strive to conduct business in ways that bring credit to us, collectively as a company and as individuals within it. H.B. Fuller does business only with partners that also adhere to high standards for ethics and compliance.

We request that you review the [H.B. Fuller Code of Business Conduct](#) and ensure your compliance with the laws and regulations that underpin our Code.

H.B. Fuller's core, minimum expectations for each of its suppliers encompass compliance with laws and regulations in all geographies in which the supplier does business, including but not limited to the following:

Anti-Bribery and Corruption

H.B. Fuller complies with anti-bribery laws wherever we do business and expects the same of our suppliers. Specifically, suppliers must comply with: (a) the provisions of the U.S. Foreign Corrupt Practices Act, which specifically prohibits U.S. companies or their affiliates from making or offering to make any payment to any foreign government official in order to influence such official, to obtain or retain business or to obtain an improper advantage; and (b) international anti-bribery standards (including the U.K. Bribery Act) and local laws that prohibit the offering or receipt of bribes in general commercial practice. The offering, giving or receiving of any bribe, whether directly or indirectly, is prohibited. We expect our suppliers to honor the same commitment.

Gifts and Entertainment

H.B. Fuller prohibits its personnel from offering to or accepting from its suppliers and any of their personnel any gifts and entertainment with the exception of nominal non-cash items and reasonable, non-lavish meals provided in direct connection with business meetings. We expect our suppliers to honor the same commitment in their dealings with H.B. Fuller and its personnel.

Fair Treatment for Workers

H.B. Fuller does not discriminate on basis of race, color, gender, religion, sex, sexual orientation, gender identity, national origin, gender, age, veteran status, or against qualified individuals based on their disability status, and expects the same of its suppliers. Moreover, H.B. Fuller complies with the requirements of 41 CFR §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a) for U.S. government contractors and subcontractors and requires covered subcontractors with which it contracts to prohibit discrimination against qualified individuals based on their status as protected veterans or individuals with disabilities, and to prohibit discrimination



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against all individuals based on their race, color, religion, sex, sexual orientation, gender identity, or national origin. H.B. Fuller also requires that covered subcontractors with which it contracts take affirmative action to employ and advance in employment individuals without regard to race, color, religion, sex, sexual orientation, gender identity, national origin, protected veteran status or disability.

H.B. Fuller does not employ persons younger than the age of 18 unless under the guidance of legally recognized apprenticeship programs within the countries in which the Company operates. We expect our suppliers to honor the same commitment.

H.B. Fuller recognizes the rights of workers to freely associate or not associate with third-party organizations, form and join worker organizations of their choosing or seek representation, and bargain collectively, as permitted by and in accordance with applicable laws and regulations. We expect our suppliers to honor the same commitment.

H.B. Fuller does not use any form of forced, bonded, indentured, or prison labor. All work is voluntary and workers are free to leave work or terminate their employment with reasonable notice in adherence to local guidelines. We commit to taking steps to ensure that no slavery or human trafficking is taking place within our organisation or supply chain. We expect our suppliers to honor the same commitment.

Work weeks at H.B. Fuller do not exceed the maximum set by local laws, and we abide with applicable wage laws, including those related to minimum wages, overtime hours and legally mandated benefits within the countries we operate. We expect our suppliers to honor the same commitment.

H.B. Fuller is committed to respecting the personal data of workers and other individuals with whom we may interact. We expect our suppliers to honor the same commitment. Where applicable, suppliers may need to enter into additional “data processing agreements” with us to establish clear rights and obligations regarding the protection of personal data.

Conflict Minerals

H.B. Fuller is committed to ensuring that ‘conflict minerals’ (namely tantalum, tin, tungsten or gold) in any products supplied to it do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses in the Democratic Republic of the Congo or an adjoining country. We expect our suppliers to honor the same commitment.

Trade Compliance

H.B. Fuller is committed to full compliance with the import and export control laws of all jurisdictions in which it does business, including U.S. laws that apply to our activities outside of the U.S. It is H.B. Fuller's policy not to do business with the following countries and region, which are currently subject to U.S. sanctions and/or embargoes: **Iran, North Korea, Syria, Cuba, and the Crimea Region of Ukraine**. It is also H.B. Fuller policy to comply with U.S. sanctions against certain individuals, organizations or entities known as “Specially Designated Nationals” (SDNs) or other denied parties lists specified by various countries' laws.



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We expect our suppliers to honor these same commitments by not providing to H.B. Fuller, directly or indirectly, good or services sourced from the listed countries or region or from any SDNs or other denied parties. Additionally, we expect our suppliers to provide in a timely manner all information and documentation required to assure compliance with these laws, to take advantage of special or preferential programs (e.g., free-trade agreements) and to participate in supply chain security programs, as may be requested by H.B. Fuller from time to time.

Sustainability

Fuller recognizes the world's finite resources require us to minimize our impact on the environment while creating value for our customers. To continuously improve our sustainability we focus on:

- * Enabling our customers to improve their products and processes through solutions that help achieve their sustainability goals
- * Optimizing our facilities' operations and process efficiency
- * Engaging our employees to be knowledgeable about and responsible for safety, wellness, and reaching our sustainability targets

We expect our suppliers to help H.B. Fuller achieve its sustainability goals, and to have a policy and/or practices in place to reduce their own environmental impact.

Questions?

If you have questions regarding H.B. Fuller's expectations for suppliers or your company's compliance with these expectations, please email your questions to supplierexpectations@hbfuller.com.

Our Privacy Notice provides details on the information we collect, why we hold it and how we use it, as well as your rights in relation to the information you share with us. We invite you to read our full [Privacy Notice](#) to learn more.



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致：富乐公司供应商
发自：Rob Hubbard - 全球战略采购总监
关于：供应商期望

尊敬的供应商：

在富乐公司，我们以维持高标准的道德准则以及遵守各项法律法规而自豪。无论公司还是个人，我们都致力于以正确的方式开展业务并为公司带来良好的声誉。富乐公司开展业务时也仅仅与同样坚持高标准的道德准则的公司合作。

我们希望贵司阅读富乐公司行为准则并确保贵司也同样遵守该准则下关于法律法规的相关规定。

富乐公司对于供应商的最低期望是基于每个供应商遵守其开展业务所在地区的法律法规，包括但不限于以下各项：

反贿赂和腐败

富乐公司遵守我们开展业务的地区的反贿赂的法规，并且希望我们的供应商同样遵守。供应商特别需要遵守：(a) 美国反海外腐败法，该法案禁止美国公司及其子公司向外国政府官员提供或允诺提供不恰当支付，意图影响该政府官员以获得或保持业务，或取得不适当的利益；(b) 国际反贿赂标准（包括英国贿赂法）以及当地的禁止接受或提供贿赂的法案。允诺提供、提供、或接受任何类型的贿赂，无论直接还是间接，都是被禁止的。我们对我们的供应商遵守此类承诺有着同样的期待。

礼品和招待

富乐公司禁止其员工从其供应商处提供或者接受任何礼品和招待，除非低于象征性金额的非现金礼品，或与业务会谈直接相关的合理的非奢侈的餐饮招待。我们期望我们的供应商在与富乐公司及其员工开展业务时亦遵守相同的承诺。

公平对待员工

富乐公司禁止对种族、肤色、性别、宗教、性取向、出生国别、年龄、服役状况产生歧视，或因残疾状况而歧视胜任员工，因此期望我们的供应商同样遵守。另外，富乐公司遵守美国政府关于外包商和分包商的 41 CFR §§ 60-1.4(a), 60-300.5(a) and 60-741.5(a) 法案，并且要求我们的分包商同样禁止针对胜任员工的残疾状况或服役状况而产生歧视，以及禁止对所有个人因为种族、肤色、宗教、性别、性取向或出生国别产生歧视。富乐公司亦要求分包商采取积极的行动雇佣员工，不得因为种族、肤色、宗教、性别、性取向、出生国别、服役或残疾状况而产生歧视。

除非是因为参加本公司运营所在国法律承认的学徒计划，否则富乐公司不会雇用不满 18 岁的人员。我们期望供应商遵守同样的承诺。

富乐公司承认员工有权利，根据适用法律和法规的许可并按照适用法律和法规的规定



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，与第三方组织自由结社或不结社、成立和加入所选择的工人组织或寻求代表、以及开展集体谈判。我们期望供应商遵守同样的承诺。

富乐公司不允许使用强迫、抵债、契约或监狱劳工。所有工作都必须自愿性的，员工可以根据当地指南通过提出适当通知自由离开公司或终止雇用关系。我们期望供应商遵守同样的承诺。

在富乐的工作时间不得超过当地法律规定的最高周数。本公司将遵守适用工资法律，其中包括公司运营所在国与最低工资、加班小时和法定福利有关的法律。我们期望供应商遵守同样的承诺。

富乐致力于尊重我们的员工或可能有互动的个体的个人资料信息。我们希望我们的供应商也能履行同样的承诺。如有需要，供应商可能需要与我们签订额外的“资料管理协议”，以明确个人资料信息保障的权利和义务。

冲突矿产

富乐公司承诺确保供应商供给的“冲突矿产”（即钽、锡、钨、金）并非用于直接或间接的资助刚果（金）及其周围国家和地区造成严重人权问题的冲突武装组织。我们期望供应商遵守同样的承诺。

贸易合规

富乐公司（H.B. Fuller）承诺全面遵守其开展业务所在的所有司法管辖区的进口和出口管制法律，包括适用于我们在美国境外活动的美国法律。富乐公司（H.B. Fuller）的政策是不与目前正在受到美国制裁和/或禁运的下列国家和地区开展业务：**伊朗、朝鲜、叙利亚、古巴和乌克兰的克里米亚地区**。富乐公司（H.B. Fuller）的政策还规定，遵守美国针对特定个人、组织或实体（称为“特别指定国民”，以下统称为 SDN）或者各国法律指定的其他被拒绝方名单的制裁。我们期望供应商遵从相同的承诺，不直接或间接向富乐公司（H.B. Fuller）提供从上述所列国家或地区或者任何 SDN 或其他被拒绝方采购的商品或服务。此外，我们期望供应商按照富乐公司（H.B. Fuller）提出的要求，及时提供所需的所有信息和文档，以便确保遵守这些法律、充分利用特殊或优惠计划（例如自由贸易协定）和参与供应链安全计划。

可持续性

富乐公司意识到全球的有限资源要求我们在为客户创造价值的时候最大程度的降低对环境的影响。为了持续改进可持续性，我们致力于：

- *通过帮助客户实现其可持续性的解决方案使客户改进产品及工艺；
- *优化本公司的运作及工艺效率
- *增加员工对于安全，健康的知识和责任，以达到我们的可持续性目标

我们期望供应商帮助富乐公司完成我们的可持续性目标，并且供应商自己拥有关于降低对环境的影响的相关政策和程序。



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问题?

如果贵司对富乐公司关于供应商的期望，或者贵司对这些期望的合规有任何疑问，请发邮件至 supplierexpectations@hbfuller.com

我们的隐私声明提供我们收集资料的详情。比如，我们持有该资料的原因和如何使用该资料，以及您与我们分享资料的相关权利。我们邀请您阅读我们的[完整隐私声明](#)以了解更多信息。