

# Code of conduct

## Introduction

All Vandewiele group associates worldwide are expected and directed to comply with the letter and the spirit of this Code. The Code should be interpreted as a baseline or a minimum requirement, to be always followed, unless doing so would violate the law. There may also be specific internal policies that require more of associates than required by this Code; the same may be true for local legislation.

Vandewiele group\* operations are based on close, long-term relationships with customers, suppliers, associates and other business partners, and we seek to be perceived as a credible, long-term, and reliable partner. Our business shall be conducted in line with the principle of long-term, soundly based development. As well as being subject to business economic requirements, goals and guidelines, our business activities shall also be conducted in accordance with strict criteria in terms of integrity and ethics. We therefore attach great value to acting in a professional, honest, and ethically correct manner.

The Code applies not only to our own operations but also to our relationship with our suppliers of products and services. Our ambition is to work with our suppliers toward the goals of achieving positive change. Our aim is to ensure that all suppliers to our companies live up to the Code. However, we acknowledge that certain adjustments take time. At the same time, we expect a continuous striving for improvement. As a minimum, we observe all applicable laws and regulations and where necessary we will also introduce standards in accordance with this Code, where laws and regulations do not align with the Code's objectives. We expect that, in their operations, suppliers maintain knowledge of, and as a minimum requirement observe national legislation in the countries where they operate.

Responsibility for ensuring that day-to-day operations are managed in accordance with our Code of Conduct rests with the CEO.

## **Working conditions**

We shall provide a healthy working environment, physically and socially, and shall strive to be an attractive employer and pay attention to the personal development of our employees. Relationships with and between employees shall be based on mutual respect and dignity and shall also provide reasonable degree of influence in areas affecting the working situation of the individual. We require suppliers to respect human rights and to ensure that employees are treated in accordance with the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

## **Working environment**

We seek a constant improvement in health and safety in the workplace and work to provide our employees with a safe working environment. We will as a minimum strictly observe national laws and/or collective bargaining agreements. Suppliers shall as a minimum observe applicable laws and regulations concerning the working environment and working conditions. We also demand that our suppliers prioritize the health and safety of their employees and furthermore expect that suitable provision is made for safety, that equipment and buildings are safe, and that the use of hazardous materials is reduced to a minimum. Waste has to be minimized and if any, dealt with safely.

## **Pay and work**

The terms and conditions of employment, including financial compensation and working hours, that are offered to our employees shall at least meet the minimum requirements of national legislation if any, or shall be in line with relevant standards in the locations where we conduct business. Suppliers shall apply working hours and pay wages and overtime compensation at least in accordance with national laws and agreements, or in accordance with standard practice in local industry.

## **Equal opportunity**

We advocate change and development and take the view that this is not possible to achieve in a workplace that does not offer equal opportunity. Against that background, we strive to an inclusive environment in which employees are offered equal opportunity for development, training, compensation and terms and conditions of employment, irrespective of gender, age, ethnic or national background, religion, sexual disposition, disability, or other distinguishing characteristics. In cases where compensation gaps exist, we shall make active efforts to even these out. We also strive to an equal balance at recruitment.

## **Discrimination**

Our corporate culture is non-discriminatory and based on responsibility and respect. We are convinced that good results, job satisfaction, commitment and cooperation are achieved through diversity, and all employees are offered equal opportunities for development, irrespective of gender, age, ethnic or national background, religion, sexual orientation, disability, or other distinguishing characteristics. We do not allow any discrimination or harassment in any form.

## **Forced labor**

We do not accept forced labor, work unwillingly performed or unpaid work in any form. This includes agreements made under forced conditions, and illegal workforces. Furthermore, we do not accept methods that restrict the free movement of employees, and no person may be kept at work for any time against that person's will.

## **Child labor**

The UN's Convention on the Rights of the Child, the International Labor Organization's Convention concerning the Minimum Age for Admission to Employment and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labor, serve as guidelines for all business conducted in our name. No person below the age for having completed compulsory schooling or below the age of 15 years may be employed. If it is found that a child is working at one of our suppliers, we request action to be taken to remedy the problem, provided that such action does not lead to a worsening of the child's social situation. Should shortcomings still exist after the supplier has been given reasonable time and opportunity to remedy such shortcomings, the supplier shall be replaced.

## **Disciplinary measures**

Employees shall be treated with respect and dignity. No employee may in any circumstances be subject to punishment, compulsion, or harassment under any form (physical, psychological, sexual, punitive...). No deduction from wages may be made as a disciplinary measure, unless governed by collective bargaining agreement or approved by law.

## **Freedom of association and right to collective pay bargaining**

Employees shall be free to exercise their legal right to be members of, organize or work for organizations that represent their interests as employees. Suppliers shall not expose employees to threat or harassment, or otherwise limit or interfere in employees' legal and peaceful exercise of their rights.

## **Political involvement**

We maintain neutrality towards political parties and candidates. We nor any other resources whatsoever under our control shall be used to promote the interests of political parties or candidates.

## **Relationship with the community**

We wish to exert a positive social influence in the communities in which Vandewiele group operates. Business decisions that may be assumed to affect the community at large shall wherever possible, be preceded, or followed at the earliest opportunity, by discussions with representatives of the community to identify any need for joint actions.

## **Environmental policy**

The Environmental Policy expresses Vandewiele group's strong will to take up its responsibility in achieving sustainable development and a realizing a better environment. We work proactively to continually reduce our direct and indirect environmental impact. Eco cycle thinking and conservation of natural resources and reducing energy consumption, and using renewable energy are an important starting point for our business activities. Important decisions shall take due account of environmental consequences to create long-term value for our stakeholders, and the community at large. Environmental projects shall be executed within the scope of our mission and shall be closely integrated into operational activities with the aim to cover in the long term, the whole lifecycle of the products and services we supply. We want to maintain a comprehensive view of environmental issues through a high level of competence among our employees and by constantly developing our knowledge of environmental consequences of our actions. Environmental conservation measures shall be implemented to the extent they are technically feasible, reasonable from a business economic point of view and environmentally justified. Suppliers are encouraged to operate in line with our environmental policy. Suppliers shall also be familiar with and observe requirements defined by national legislation, statutes, and industry standards. Suppliers shall as a minimum requirement operate a secure system for management of hazardous materials and waste together with a systematic approach aiming to reduce the environmental footprint of their operations.

## **Anti-corruption**

We do not accept corruption, bribery, or unfair, anti-competitive practices. All sales and marketing of our products and services shall be conducted in accordance with relevant laws and regulations in the country concerned. We shall not act in breach of applicable laws on competition. We do not participate in cartels or other non-permissible cooperation with competitors, customers, or suppliers. If any of our employees is contacted with any suggestion of non-permissible cooperation of this kind, such contact shall be reported to the group management. We shall not offer or make inappropriate payment or other remuneration to any person or any organization to induce the person or organization to establish or maintain a business relationship with our company. We shall not, directly, or indirectly, request or accept any form of inappropriate payment or other remuneration provided to establish or maintain a business relationship with our company. In order to prevent conflicts of interest, our employees shall only give or receive limited gifts or services that do not conflict with relevant law and are in line with general business practice and that cannot reasonably be regarded as constituting bribes. We respect other companies' assets and protect our tangible and intangible assets from loss, theft, infringement, and misuse. We must not do business with customers or suppliers that we suspect of violating our anti-corruption rules.

## **Communication**

We maintain an open dialogue with those who are affected by our operations. We reply to questions from outside interests and communicate with the parties concerned correctly and efficiently. Questions may be asked via [privacy@vandewiele.com](mailto:privacy@vandewiele.com).

## Application

Managers and leaders at Vandewiele Group shall be familiar with this Code of Conduct, as well as relevant national legislation and regulations, and shall be responsible for ensuring that they are observed within their area. The CEO will also be responsible for ensuring that the suppliers are familiar with and accept the Code. All employees of the company are responsible for ensuring that they themselves act in accordance with the values and business principles represented in the Code.

The management of the Vandewiele Group is responsible for (i) ensuring that the implementation of the principles of this Code is a continuous process, (ii) documenting and (iii) communicating how we and our suppliers meet its requirements.

## Follow-up

Every employee of Vandewiele Group is responsible for reporting to the group management any cases of fraud or other criminal behavior. Any confirmed infringements of our Code of Conduct will lead immediately to disciplinary actions, which include dismissal in the event of serious deviation from the guidelines.

Employees who are uncertain as to whether specific behavior may conflict with the Code shall consult with their immediate superior. We reserve the right to conduct unannounced inspection and follow-up of every supplier and manufacturer, where appropriate with the aid of an independent third party, to assure ourselves that our Code of Conduct is being observed and respected. This means, but is not limited to the requirement, that suppliers and manufacturers shall on request provide a specification of employees, working hours and payroll lists, documentation on injuries and accidents in connection with work, and details of preventive actions taken and of fire safety measures and evacuation practices performed. If a supplier or manufacturer does not carry out stipulated improvements within the period agreed, despite being called on to do so and despite an action plan having been agreed, we will terminate our working relationship with that supplier or manufacturer.

## Responsibility for employees

The CEO is responsible for communicating the content and purpose of this Code of Conduct within his/her organization and for encouraging employees to report circumstances that may conflict with the Code's rules. Reports of infringements of the Code may be made anonymously and in confidence to [privacy@vandewiele.com](mailto:privacy@vandewiele.com). Individuals who, in good faith, submit a report will not be subject to any punishment or other adverse consequences. Failure to observe the rules set forth in this code of ethics may result in disciplinary measures.

## Protection of personal data

In carrying out its business activities and to protect personal data, the Vandewiele Group undertakes to process such data in accordance with the law and in particular in conformity with the following criteria: transparency with regard to the persons to whom the data refer, lawfulness and correctness of processing, processing in accordance with the declared and pursued aims, guarantee of security of the processed data. Considered as "personal data" is any information relating to identified or identifiable individuals, including indirectly, through reference to any other information, including a personal identification number.

## Vandewiele Group commitments

We are working towards ensuring that our products do not contain Conflict Minerals.

Therefore we are committed to:

- identifying which products that are impacted and targeting our efforts accordingly
- not sourcing products and materials containing Conflict Minerals directly from Conflict Mines
- requesting our suppliers to work towards ensuring that any Conflict Minerals contained in the products and materials supplied to Vandewiele Group do not originate from Conflict Mines

In addition, we are committed to engaging with our customers regarding their disclosure obligations.

\* Vandewiele Group: the list of Vandewiele group companies is updated annually with the publication of the consolidated annual accounts of the consortium Vandewiele. This publication is freely available on the website of the National Bank of Belgium under the heading Central Balance Sheet Office. URL : [Central Balance Sheet Office | nbb.be Search by enterprise number : 0405450595](#)