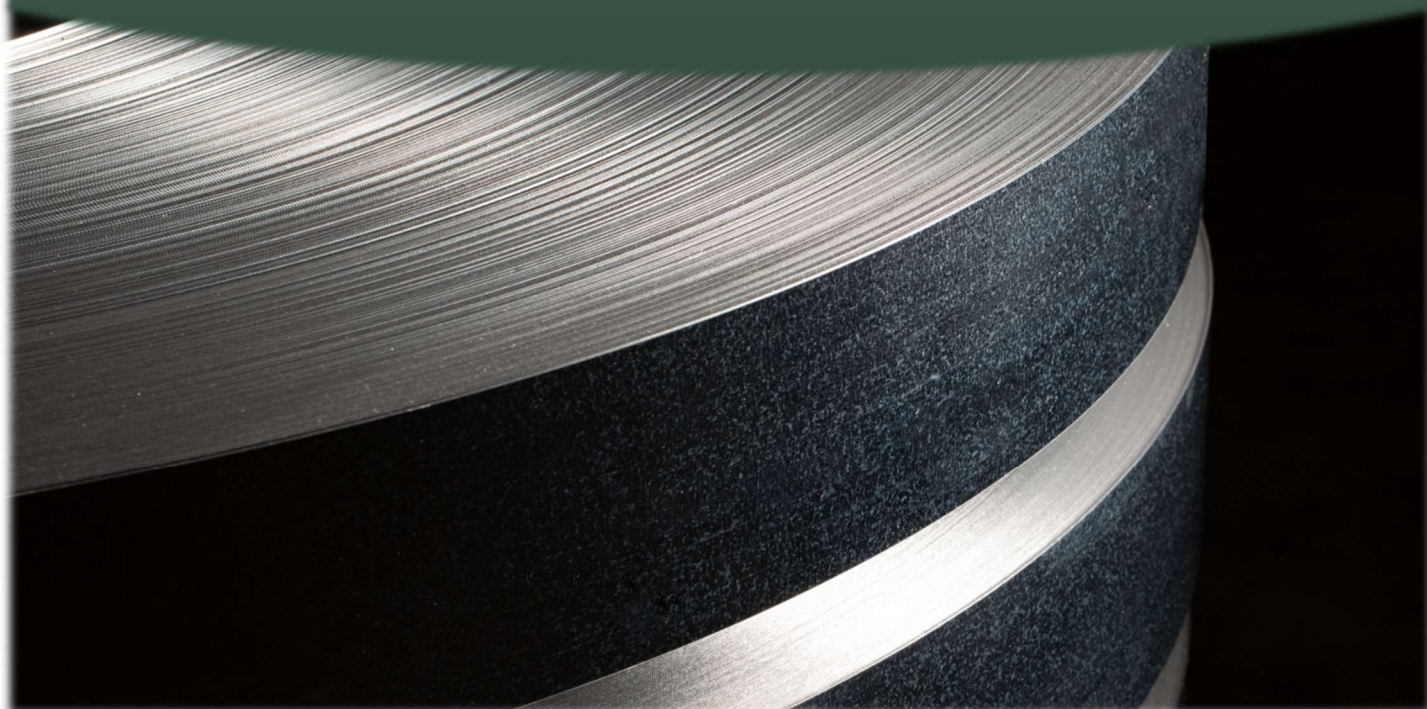


# SUPPLIER CODE OF CONDUCT

Vergalle NV

Issue date – 21/05/2024



## 1 Our mission

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VERGALLE strives to do business in an honest, responsible way, and wants to contribute to a sustainable world. This means VERGALLE is committed to creating a safe work environment and sustainable working conditions for all persons involved in their supply chain; to practice ethical business practices; and to minimizing the impact of our operations on people and the environment.

VERGALLE believes that it requires a collective engagement from all Suppliers, including its representatives, employees, agents, subcontractors and affiliates (collectively referred to as “Suppliers”) to achieve our sustainability mission. Therefore, this Supplier Code of Conduct (further referred to as “Code”) translates our mission and sets out our principles and expectations as to how Suppliers are to conduct business with or on behalf of VERGALLE.

## 2 Compliance with the Supplier Code of Conduct

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Suppliers must adhere to this Code while conducting business with or on behalf of VERGALLE. We also expect our Suppliers to communicate this Code to their employees, subcontractors and representatives to ensure that they comply with this Code.

Suppliers must promptly inform their contact when any situation develops that causes the Supplier to operate in violation of this Code.

All Suppliers must conduct their employment practices in full compliance with all applicable laws and regulations and in compliance with the requirements of VERGALLE, which may exceed local legal requirements. In all cases in which the requirements of VERGALLE are more stringent than local legal requirements, Suppliers are required to meet the more stringent requirements.

While Suppliers are expected to self-monitor and demonstrate their compliance with the Code, VERGALLE may audit Suppliers or inspect Suppliers’ facilities to confirm compliance.

## 3 Business integrity

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### Laws and regulations

Suppliers shall operate in full compliance with all applicable national, international and local laws and regulations that are applicable to their business operations, and in the countries where they operate. Suppliers shall obtain all necessary permits for conducting their operations.

In case applicable law requirements are less stringent than the requirements as set forth in this Code, VERGALLE expects Suppliers to comply with the higher standards. Local industry standards prevail in cases where these are more stringent than local legal requirements.

### Free and fair competition

Suppliers value free and fair competition throughout the world and shall therefore comply with the rules for the protection of a free market and open competition in all areas in which they operate. Suppliers have implemented strict policies in this respect.

### Embargoes and trade law

Suppliers respect the applicable trade laws and restrictions as imposed by the United Nations or other national or supranational bodies or governments, and have implemented strict policies to ensure compliance therewith.

### Anti-corruption and anti-bribery

Suppliers shall not engage in or tolerate any form of corruption including extortion and active or passive bribery. Suppliers must comply with all applicable anti-corruption and anti-money laundering laws, including the FCPA, as well as laws governing lobbying, gifts, and payments to public officials, political campaign contribution laws, and other related regulations.

Suppliers must report signs of any personnel, representative, or partner performing unethically or engaged in bribery or kickbacks.

Suppliers must not, directly or indirectly, offer or pay anything of value (including travel, gifts, hospitality expenses, offers of employment, and charitable donations) to any official or employee of any government, government agency, political party, public international organization, or any candidate for political office to improperly influence any act or decision of the official, employee, or candidate.

## Favours and gifts

Business courtesies given to VERGALLE employees should be modest and infrequent and should never be given to gain an improper business advantage. Therefore, Suppliers should use good judgment when exchanging business courtesies. Gifts, meals, entertainment, hospitality, and trips that are lavish or lack transparency or a legitimate purpose, may be viewed as bribes, may create the appearance of a conflict of interest, or may be perceived as an attempt to improperly influence decision making.

## Privacy and intellectual property

Suppliers will respect intellectual property rights, protect confidential information, and comply with applicable privacy rules and regulations. All Suppliers shall, without limitation:

- Protect and responsibly use the physical and intellectual assets of VERGALLE, including intellectual property, tangible property, supplies, consumables and equipment, when authorized by VERGALLE to use such assets.
- Respect and protect the intellectual property rights of all parties by only using information technology and software that has been legitimately acquired and licensed.
- Use software, hardware, and content only in accordance with their associated licenses or terms of use.
- Ensure that all personal data of employees, contractors and/or other third parties is processed in compliance with all applicable laws, including the General Data Protection Regulation (EU 2016/679).

## 4 Human rights and labour principles

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### General

VERGALLE recognizes its commitment to treating employees fairly and respectfully, and not to discriminate in any way. VERGALLE expects Suppliers to share this commitment and to comply with the applicable employment laws and regulations.

We also expect our Suppliers to respect and support the UN Global Compact's human rights principles and labour principles.

### Non-discrimination and fair treatment

Suppliers must commit to a workforce and workplace free of harassment and unlawful discrimination.

Suppliers must provide employees with procedures they can use to bring workplace concerns, including those involving harassment and discrimination, to the attention of management for appropriate resolution.

While we recognize and respect cultural differences, Suppliers must provide equal opportunity in the workplace and not engage in discrimination in hiring, compensation, access to training, promotion, termination, and/or retirement based on but not limited to: race, color, gender, national origin, religion, age, disability, gender identity or expression, marital status, pregnancy, sexual orientation, political affiliation, union membership, or veteran status. Suppliers must accommodate all disabilities to the extent required by law.

### No forced labour

VERGALLE does not tolerate any forced or compulsory labour, including indentured labour, bonded labour, or any other sort of forced labour. Support for or engagement in any form of human trafficking or involuntary labour through threat, force, fraudulent claims, or other coercion is prohibited.

### No child labour

VERGALLE does not tolerate any form of child labour. Suppliers must act in line with Convention 138 (Minimum Age) and Convention 182 (Worst Forms of Child Labor) of the International Labor Organization, and according to the applicable laws and regulations.

### Minimum wages and working hours

Suppliers shall comply with all applicable laws and regulations, including (but not limited to) those relating to minimum wages, working hours and overtime hours. Suppliers are expected to provide their employees with fair and competitive compensation and benefits.

### Health & Safety

Suppliers are expected to develop and implement health and safety management practices in all aspects of their business, in compliance with all applicable laws and regulations.

Suppliers shall comply with all applicable occupational health and safety laws and regulations, including but not limited to laws and regulations that address occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food and housing. Suppliers shall provide a safe and healthy work environment for all employees and take action to minimize the causes of hazards inherent in the working environment.

Suppliers shall ensure that workers are provided with ready access to clean toilet facilities, potable water, sanitary food preparation and eating facilities. Worker dormitories and transportation, if provided, must meet applicable host-country housing and safety standards and be maintained in a clean and safe manner.

## Freedom of Association

Suppliers shall uphold the right of employees to freely associate, to bargain collectively and to establish or join labour unions and representative organizations, if they wish to do so.

# 5 Environment

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## General

VERGALLE recognizes its responsibility to minimize its environmental impact and engages sustainable business practices. VERGALLE strives to reduce its carbon footprint through resource efficiency, waste reduction, and implementing eco-friendly products and production methods.

VERGALLE expects Suppliers to share its commitment by responding to challenges posed by climate change and working towards protecting the environment. As a part of this commitment, all Suppliers must obtain and maintain all required environmental permits and registrations. Additionally, all Suppliers must comply with all environmental laws and regulations applicable to the workplace, products and production methods.

We expect our Suppliers to respect and support the UN Global Compact's environment principles, and to establish and maintain a suitable environmental management system (e.g. in accordance with ISO 14001 or equivalent).

## Continuous improvement

Suppliers shall apply and implement continuous improvements related to raw materials, energy consumption, emissions, noise, waste management and use of hazardous substances.

## Waste and hazardous substances

Suppliers shall comply with the applicable laws and regulations regarding the use, storage, recycling and disposal of waste and hazardous substances. They strive to reduce or eliminate waste and shall establish procedures to ensure the safe handling, storage, recycling and disposal of waste and chemicals.

## Energy consumption and carbon footprint

Suppliers shall avoid excessive consumption of energy and reduce carbon emissions. Suppliers shall maximize the use of renewable energy.

## Water and air emissions

Suppliers endeavor to reduce or eliminate water or air discharges and energy losses.

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## Supplier agreement

Herewith Supplier confirms to have received the Supplier Code of Conduct of VERGALLE and commits to comply with it while doing business with VERGALLE.

Company Name:

Company Stamp :

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Name:

Title:

Date:

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Signature :

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