

Policy Document

Supplier Code of Conduct

Version 20240212

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1 Introduction

This Code of Conduct plays a crucial role in our process of selecting and evaluating suppliers. Compliance with the Code of Conduct is an absolute requirement for all suppliers who wish to work with WEngage. This means that accepting and adhering to the Code of Conduct is a non-negotiable condition for entering into a partnership with our company.

The Code of Conduct forms the basis for our relationship with our suppliers and serves to create a mutual understanding of our company's core values and beliefs. The purpose of this Code of Conduct is to outline our expectations under the law, as well as our beliefs, in order to ensure consistent compliance from all our suppliers, including their subcontractors, who supply goods or services to WEngage.

The Code of Conduct is designed to communicate our commitment to sustainable and responsible business operations, as well as our expectations of our suppliers.

The Code of Conduct applies to any company that supplies goods or services to WEngage (hereinafter referred to as the "Supplier"). The Code of Conduct is not exhaustive, suppliers are expected to use their own judgment to ensure compliance in areas not explicitly addressed.

We believe that a strong relationship with our suppliers is essential to our success.

Subscribing to this Code of Conduct is a prerequisite for suppliers to be able to work with WEngage. It demonstrates their commitment to our shared values and their willingness to work together towards sustainability and responsibility within our supply chain.

By adhering to this Code of Conduct, we can achieve our business objectives in a way that is ethical and has a positive impact on society and the environment.

We look forward to a fruitful collaboration with all our suppliers, based on mutual respect, integrity and responsibility.

1.1 Overview

1.1.1 Commitment to human rights

We expect all our suppliers to show a dedication to human rights and to uphold the highest standards, even where applicable laws and regulations may differ. Our Code of Conduct is rooted in a profound commitment to human rights.

1.1.2 Compliance with Laws and Regulations

We require our suppliers to fully comply with all applicable laws, rules and regulations in the supplier's country of operation as well as in WEngage's location, where the company is based. Applicable laws and regulations include all local, state, federal and international laws and regulations, including but not limited to labour and employment laws, health and safety regulations, and environmental laws and regulations at the supplier's location.

1.1.3 Health & Safety

We recognise the fundamental importance of ensuring a safe and hazard-free environment for all our employees. We demand the highest level of commitment to health and safety standards from our suppliers.

1.1.4 Care for the environment

We recognise our responsibility for the environment and strive for sustainability in our business operations. Suppliers are expected to make an ongoing effort to improve their environmental performance and reduce their environmental impact. Suppliers must comply with all applicable laws and regulations regarding environmental practices.

1.1.5 Enforcement of standards

We expect all our activities and endeavours to be conducted with the utmost ethics, integrity and responsibility. Suppliers must act ethically in all aspects of their business, practices, operations and relationships. We hold all our suppliers to the highest ethical standards.

1.2 Human rights and working conditions

We expect all our suppliers to be committed to human rights and to adhere to this highest standard, even where applicable laws and regulations may differ.

By adhering to these guidelines, our suppliers can help create a fair, respectful and safe working environment, which is essential for the well-being and productivity of everyone involved.

1.2.1 Prohibition of Child Labour

All employees must be at least 18 years old. Suppliers must maintain official and verifiable documentation of the age of each of their employees.

1.2.2 Prohibition of Forced Labour and Modern Slavery

All work must be carried out on a voluntary basis. Suppliers shall not tolerate any form of illegal forced labour, including human trafficking, forced, enslaved, bonded or prison labour.

1.2.3 Prohibition of Discrimination

Suppliers shall not tolerate any form of discrimination based on race, religion, gender, disability, national origin, veteran status, trade union membership, political beliefs, or any other class that is protected by law.

1.2.4 Diversity, Inclusion and Engagement

Diversity, inclusion and engagement are an ongoing journey. WEngage is on that journey and is committed to becoming a truly diverse workplace where every employee can be themselves and bring their unique perspectives to work. Suppliers must demonstrate their commitment to identifying, measuring and improving a culture of diversity and inclusion in all aspects of workplace management.

1.2.5 Freedom of Association

We strongly believe in the principle of freedom of association. We expect our suppliers to recognise, respect and protect the legal rights of their employees to freely associate and to bargain collectively.

1.2.6 Wages, Benefits & Respect for Employment Conditions

Suppliers must pay employees according to applicable wage laws, including minimum wages, overtime and mandatory benefits in all jurisdictions where the supplier and WEngage operate.

1.2.7 Working hours

Suppliers must comply with all applicable laws and regulations regarding working hours, breaks and overtime in all jurisdictions where the supplier and WEngage operate.

1.2.8 No Harassment

All employees have the right to a workplace free from harassment and abuse. We require our suppliers to prohibit all forms of harassment, including physical, verbal, psychological and sexual harassment.

1.2.9 Immigration

Suppliers must comply with applicable immigration laws and regulations in all jurisdictions in which they and WEngage operate. Only employees with a legal right to work in the relevant location may be employed.

1.2.10 No Substance Abuse

Suppliers must create and maintain a workplace free from the illegal use, possession, sale or distribution of controlled substances. Suppliers must have policies and procedures in place to ensure that employees do not perform work under the influence of alcohol, illegal drugs or misused medications (both prescribed and non-prescribed).

1.3 Laws and regulations

We require our suppliers to fully comply with all laws, rules and regulations applicable to their country of operation and the country the WEngage customer is located in.

1.3.1 Anti-Bribery/Anti-Corruption

We expect suppliers to fully comply with all applicable domestic and foreign anti-corruption laws. Suppliers may not engage in any form of bribery or kickbacks, including promising, offering, providing or approving anything of value to a government official or political entity in order to gain an unfair business advantage. Suppliers may not engage in bribery, embezzlement, extortion or other corrupt practices.

1.3.2 Conflicts of Interest

Suppliers must avoid even the appearance of conflicts of interest in their collaboration with WEngage. Suppliers are required to disclose to WEngage any conflicts of interest, as well as known family or other close personal relationships with our employees that may affect their collaboration with WEngage.

1.3.3 Gifts and Entertainment

Suppliers may not offer or accept anything of value from business partners in order to obtain unfair business advantages. Any gifts or entertainment must comply with applicable laws and regulations and must not conflict with WEngage's policies in this regard. 'Gifts and entertainment' include anything of value, such as loans, prizes, meals, tickets or gift certificates.

1.3.4 Fair Competition and Antitrust

We require our suppliers to conduct their business in full compliance with all applicable fair competition and antitrust laws and regulations in the jurisdictions in which they operate. Suppliers may not engage in activities that could be considered anti-competitive or monopolistic, such as price fixing, market sharing, bidding manipulation or abuse of market power. They must also avoid any action that would unfairly disadvantage other companies or distort the market.

1.3.5 Trade Sanctions

We require our suppliers to comply with international trade sanction programmes and regulations. This requires careful due diligence before selecting a business partner.

1.3.6 Money Laundering

All suppliers are expected to comply with applicable laws and regulations designed to prevent unlawful or illegal financial transactions. This requires careful due diligence before selecting a business partner.

1.3.7 Disclosure of Information

We expect suppliers to accurately record and disclose information about their business activities, without falsification or misrepresentation, to all interested parties and as required by law. Suppliers must not falsify records or misrepresent conditions or practices and must be transparent in all dealings with WEngage.

1.3.8 Confidentiality/Privacy

Suppliers may not disclose such information without WEngage's prior written consent. To conduct day-to-day business with WEngage, suppliers may need access to confidential/private data. Suppliers must ensure that this information remains protected and confidential and must comply with all applicable data protection laws and regulations. They must be able to demonstrate that their employees, subcontractors and partners are held to similar confidentiality obligations.

1.3.9 Intellectual Property

Suppliers must respect WEngage's intellectual property rights, including processes, information, technology and customer information. Suppliers are required to take all reasonable steps and necessary precautions to protect their knowledge and protect intellectual property rights.

1.3.10 Accuracy of Company Records

We are committed to the integrity of our company records and to ensuring that our books, records and financial reporting are accurate and complete. We require suppliers to keep their business and financial books, records and statements up-to-date in order to demonstrate compliance with applicable laws and regulations. These records must be made available at the request of WEngage.

1.3.11 Workplace standards

Suppliers must commit to and ensure a safe working environment for all employees. Suppliers must follow all general workplace standards and must comply with all applicable laws and regulations, including those relating to labour, wages, working hours, discriminatory hiring and employment practices, and health and safety.

1.4 Health and safety

Health and safety is a key concern for our business and is deeply rooted in our ethos and business operations. We expect our suppliers to reflect this commitment and demonstrate the same degree of rigour and compliance with health and safety standards in their operations.

1.4.1 Safety Laws

Suppliers must comply with all applicable safety and health laws and regulations in the countries in which they and WEngage operate. Suppliers are expected to provide their employees with a healthy and safe working environment, including access to clean, safe and reasonable working conditions.

1.4.2 Occupational safety

Suppliers must protect employees from exposure to chemical, biological and physical hazards, in addition to workplace accidents. Suppliers are expected to identify, evaluate and manage these occupational, health and safety risks.

1.4.3 Prevention of Emergencies

Suppliers must identify and assess potential workplace emergencies. Suppliers must develop and implement emergency plans and response procedures, including but not limited to fire alarms, fire drills, evacuation facilities, fire detection and suppression equipment, and recovery plans to minimise damage to life and property. Suppliers must regularly test emergency prevention methods, such as fire alarms, to ensure they function properly.

1.4.4 Infectious diseases

Suppliers must develop, implement and maintain a plan to prepare for, prevent and respond to the potential outbreak of infectious diseases among their employees. Suppliers are expected to provide sufficient personal protective equipment to prevent the spread of infectious diseases in the workplace.

1.4.5 Incident management

Suppliers must create and maintain procedures to prevent, manage, track and report employee safety incidents. Suppliers are expected to implement corrective action plans to reduce risks, provide necessary medical treatment and facilitate employees' return to work.

1.5 Care for the environment

We require our suppliers to support sustainability initiatives in their daily activities.

1.5.1 Sustainability

Suppliers are expected to recognise their responsibility for the environment and strive for sustainability in their operations. Suppliers must make an ongoing effort to improve their environmental performance and reduce their environmental impact. Suppliers must follow all applicable laws and regulations regarding environmental practices.

1.5.2 Permits and Reporting

Suppliers must obtain and maintain all required environmental permits. Suppliers must comply with the reporting requirements of applicable permits and regulations.

1.5.3 Hazardous Materials

Suppliers are expected to train their employees in handling hazardous materials. Suppliers must create and maintain systems to ensure that hazardous materials are safely handled, moved, stored, disposed of and managed.

1.5.4 Wastewater and Solid Waste Emissions

Suppliers must comply with all applicable waste management laws and regulations. Suppliers must monitor, treat, control, manage and properly dispose of wastewater and solid waste.

1.5.5 Air emissions

Suppliers must identify, manage, reduce and properly dispose of air pollutants that pose a hazard to the environment. Suppliers are expected to regularly monitor the performance of their air emissions control systems.

1.5.6 Pollution Prevention

Suppliers should strive to reduce the consumption of resources, including raw materials, energy and water. Suppliers are expected to implement improvement plans for waste reduction, recycling and energy saving policies and find ways to use cleaner energy sources.

1.5.7 Conflict minerals

Suppliers and their subcontractors are prohibited from using conflict minerals, the procurement of which is linked to human rights violations. Suppliers must comply with the conflict reporting requirements imposed by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.

1.6 Enforcement of the Standards

We expect our suppliers to maintain the highest standards in all aspects of their business operations, reflecting their commitment to integrity and excellence.

1.6.1 Risk assessment and management

We expect suppliers to develop and maintain processes that identify risks in all areas covered in this Code of Conduct; assess the significance of each risk; and implement appropriate procedures and controls to minimise identified risks. Suppliers must take a proactive approach to risk identification and management.

1.6.2 Audits and Inspections

WEngage may audit suppliers at any time to ensure that they meet the standards set out in this Supplier Code of Conduct. Factories can be inspected as part of this process. If permission to conduct an audit is denied, consequences may ensue, including termination of our contract.

1.6.3 Protection of Whistleblowers

Suppliers are required to implement and maintain an anonymous complaints system for employees and third parties. Suppliers must protect the confidentiality of whistleblowers and prohibit retaliation.

1.6.4 Verification

We require suppliers to maintain documentation to verify compliance with the Code of Conduct and applicable laws and regulations. Suppliers must have robust systems for documentation in place and follow best practices for document retention.

1.6.5 Non-compliance

Failure to comply with this Code of Conduct may lead to reports to authorities, fines and claims for damages. We reserve the right to terminate the business relationship with any supplier who does not comply with the Code of Conduct. If a supplier is found to be non-compliant with the Code of Conduct, they must correct their actions to ensure compliance with the requirements set out in this document.

2 Contact

Reports regarding violations of applicable law or the Code of Conduct must be received in accordance with our Reporting Policy.

By registered mail

You can submit a report addressed to the Legal Counsel at the following address:

WEngage International nv
Woluwelaan 158
1831 DIEGEM
Belgium

By e-mail

You can also submit a report by e-mail addressed to the Legal Officer at the following address:

legal@WEngage.eu

Our Hotline

You can use our independent and confidential hotline service available 24 hours a day, 7 days a week. To express your concerns, please click the link below.

<https://wengage.eu/en/legal/>