

Policy document Supplier Code of Conduct

Confidential

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Roles and responsibilities

Role	Description	Name / Title
R	Responsible: The person who performs the activity/work to accomplish the task.	JT CAO
A	Accountable: The person tasked with ensuring that the task is completed properly. Can delegate the work to those responsible.	Accounting
C	Consulted: Those whose opinions are sought, usually subject matter experts and with whom there is a two-way communication.	YB Facility Manager
I	Informed: Those who are kept informed of progress, often only after completion of the task or deliverable and with whom there is one-way traffic.	All employees

Version control

This document is updated when necessary, but reviewed at least every year .

Version number	Author	Approvals	Date	Description
1	JT	Excom	12/02/24	First version
2	JT	Excom	22/10/24	Update version format
3	JT	Excom	25/10/24	Addition of "accreditation and acceptance form"

KPIs

Target	Responsible	Description of measurement method and reporting	Score 22/10/24
2024 target 70% of procurement (base 2023)	JT	Positive reactions / confirmation on mail	69% Replay will be sent out in Q4/2024

1 Introduction

This Code of Conduct plays a crucial role in the process of selecting and evaluating suppliers. Compliance with the Code of Conduct is an absolute requirement for all suppliers who want to work with WEngage. This means that adherence to and adherence 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 of our relationship with our suppliers and creates a mutual understanding of our company's core values and beliefs. The purpose of this Code of Conduct is to set out our expectations under the law, as well as our beliefs, ensuring consistent compliance with all our suppliers, including their subcontractors, who provide 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 "Supplier"). The Code of Conduct is not all-encompassing, suppliers are asked to use their own judgment to ensure compliance with topics that have not been explicitly addressed.

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

Signing 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 on sustainability and responsibility within our supply chain.

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

We look forward to a fruitful cooperation 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 have a commitment to human rights and adherence to the highest standards, even when applicable laws and regulations differ. Our Code of Conduct is rooted in a deep commitment to human rights.

1.1.2 Compliance with Laws and Regulations

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

1.1.3 Health & Safety

We recognize 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 recognize our responsibility for the environment and strive for sustainability in our business operations. Suppliers are expected to adopt a continuous improvement approach to improve their environmental performance and reduce their environmental impact. Suppliers must follow all applicable laws and regulations regarding environmental practices.

1.1.5 Enforcement of standards

We expect the highest standards of ethics, integrity and accountability in all our activities and endeavors. Suppliers must act ethically in all aspects of their business operations, 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 uphold this highest standard, even when applicable laws and regulations differ.

By adhering to these guidelines, our suppliers can contribute to creating a just, 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 must not tolerate any form of illegal forced labor, including human trafficking, forced, slavery, bondage, or prison labor.

1.2.3 Prohibition of Discrimination

Suppliers may not tolerate discrimination of any kind based on race, religion, sex, disability, national origin, veteran status, union membership, political affiliation, or any other protected class under the law.

1.2.4 Diversity, Inclusion, and Inclusion

Diversity, inclusion, and inclusion 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 identify, measure, and improve 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 bargain collectively.

1.2.6 Pay, Benefits & Respect for Benefits

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 bullying

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

1.2.9 Immigration

Suppliers must comply with applicable immigration laws and regulations in all jurisdictions where 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 are not performing work under the influence of alcohol, illegal drugs, or abused medication (both prescription 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 WEngage customer's country is located.

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 bribery, 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 must not engage in bribery, embezzlement, extortion, or other corrupt practices.

1.3.2 Conflicts of interest

Suppliers should avoid even the appearance of conflicts of interest in their cooperation with WEngage. Suppliers are required to report any conflicts of interest to WEngage, as well as known

family or other close personal relationships with our employees that may affect their association with WEngage.

1.3.3 Gifts & Entertainment

Suppliers must not offer or accept anything of value from business partners in order to obtain unfair business advantages. All gifts or entertainment must comply with applicable laws and regulations and must not violate WEngage's policies on the matter. "Gifts and entertainment" include anything of value, such as loans, prizes, meals, tickets, or gift cards.

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, offering manipulation or abuse of market power. They should 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 sanctions programs 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 that aim 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 parties involved and as required by law. Suppliers must not falsify records or misrepresent circumstances or practices and must be transparent in all their dealings with WEngage.

1.3.8 Confidentiality/Privacy

Suppliers may not disclose such information without WEngage's prior written consent. In order 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, sub-suppliers and partners are held to similar confidentiality obligations.

1.3.9 Intellectual

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

1.3.10 Accuracy of Business Records

We are committed to the integrity of our company records and 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 to demonstrate compliance with applicable laws and regulations. At WEngage's request, these records should be made available.

1.3.11 Workshop 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 labor, wages, working hours, discriminatory hiring and employment practices, and health and safety.

1.4 Health & Safety

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

1.4.1 Safety Laws

Suppliers must comply with all applicable health and safety 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 workers from exposure to chemical, biological, and physical hazards, in addition to workplace accidents. Suppliers are expected to identify, evaluate, and manage these labor, 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, escape facilities, fire detection and suppression equipment, and recovery plans to minimize damage to life and property. Suppliers should regularly test emergency prevention methods, such as fire alarms, to ensure they are functioning properly.

1.4.4 Infectious diseases

Suppliers must develop, implement, and maintain a program to prepare for, prevent, and respond to the potential infectious disease outbreak among their employees. Suppliers are expected to provide adequate 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 risk, 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 day-to-day operations.

1.5.1 Durability

Suppliers are expected to recognize their responsibility to the environment and strive for sustainability in their business operations. Suppliers must adopt a continuous improvement process 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 the applicable permits and regulations.

1.5.3 Hazardous Materials

Suppliers are expected to train their employees on how to handle 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 emission management systems.

1.5.6 Pollution Prevention

Suppliers should aim 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 conservation policies and seek ways to use cleaner energy sources.

1.5.7 Conflict Minerals

Suppliers and their subcontractors are not allowed to use conflict minerals, the sourcing of which is linked to human rights violations. Suppliers must comply with conflict reporting requirements as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act and the Securities and Exchange Commission.

1.6 Maintaining the Standards

We expect our suppliers to maintain the highest standards in all aspects of their business operations, demonstrating 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 minimize the risks identified. Suppliers need to take a proactive approach to risk identification and management.

1.6.2 Audits and Inspections

WEngage may audit suppliers at any time to verify that they comply with 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, there may be consequences, including the termination of our agreement.

1.6.3 Whistleblower Protection

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. Vendors must have robust systems in place for documentation and must follow best practices for document retention.

1.6.5 Non-compliance

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

2 Contact

Reports of violations of applicable legislation or the Code of Conduct will be received in accordance with our Reporting Procedure.

By registered mail

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

WEngage International nv
Avenue de la Woluwe 158
1831 DIEGEM
Belgium

By email

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

legal@WEngage.eu

Our hotline

You can use our independent and confidential reporting service that is available 24 hours a day, 7 days a week. To express your concerns, you can click on the link below.

<https://WEngage.eu/nl-nl/juridisch>

3 Recognition and acceptance form

(To be signed by the Supplier's authorized signatory at the Supplier onboarding and thereafter annually, at WEngage's request)

Me, _____ [name], [position]

of _____ [Supplier Name], hereby confirm that I have read and understood the WEngage Supplier Code of Conduct and further confirm that we comply with the provisions of the Supplier Code of Conduct to the extent they apply to us.

I understand that any violation/violation of the Supplier Code of Conduct may result in termination of any contract and removal from Wengage's list of suppliers, contractors and consultants.

I further agree to provide such documents to demonstrate compliance with applicable laws, as may be required by WEngage from time to time.

I confirm that we are not subject to bankruptcy, insolvency, liquidation proceedings or that our assets have been administered by a receiver or court.

Signature:

Date and place: _____

To be returned by email to Finance.be@wengage.eu