



**Sustainability -
Supplier Code of Conduct**

Date: 12/06/2024

CODE OF CONDUCT FOR SUPPLIERS

ARTICLE 1 DEFINITIONS

Circet: Circet Benelux NV, a limited liability company incorporated under Belgian law, registered under number 665.840.662, Circet Belgium NV, a limited liability company incorporated under Belgian law, registered under number 0874.125.297 and Circet Nederland BV, a limited liability company incorporated under Dutch law, registered under number 64199509 and their subsidiaries.

Supplier: any legal or natural person directly or indirectly providing services or products to Circet.

Code of Conduct: this Code of Conduct for Suppliers of Circet.

ARTICLE 2 PURPOSE

Circet places very high value on honesty and integrity and cares deeply about the environment. Our employees, customers and suppliers must be able to have unconditional trust in Circet.

At Circet, we regard our Suppliers as key partners in achieving our vision, mission and strategy. In order to ensure that the companies we do business with are aligned with our core values, we expect them to adopt and comply with the Circet Supplier Code of Conduct. We also expect honesty, integrity and environmental awareness from them.

The Supplier Code of Conduct describes the principles and standards we require and expect our Suppliers to implement and adhere to when conducting business activities with and for Circet.

This Supplier Code of Conduct forms part of all procurement agreements between the Supplier and Circet, and applies to any individual person or entity, including subsidiaries, affiliates and subcontractors, who supply products and solutions to Circet, its affiliates and joint ventures, anywhere in the world.

The Supplier Code of Conduct is inspired by the Ten Principles of the United Nations Global Compact, which serve as a fundamental framework for sustainability and responsible business behaviour.

ARTICLE 3 RULES OF CONDUCT

1. Legislation

- a. The Supplier shall comply with all relevant legislation and applicable national laws of the countries in which it operates.
- b. It is the Supplier's responsibility to reflect the contents of the Supplier Code of Conduct in its agreements with its subcontractors and to monitor compliance with it.

2. Human rights

- a. The Supplier supports and respects the protection of international human rights in accordance with treaties concluded by the government and United Nations resolutions.
- b. The Supplier will in particular recognise and respect within both its own organisation and the supply chain:
 - Human rights; social justice, mental and physical integrity and human dignity;
 - The diversity of different demographic groups and local cultures, including women and foreign workers;
 - The Supplier will refrain from discrimination, child labour and forced labour.

3. Fair Labour

- a. The Supplier supports and respects internationally endorsed labour rights in accordance with what is set out in the International Labour Organization (ILO) conventions. These include but are not limited to the following:
- b. The Supplier recognises and respects employee's right to:
 - Collective bargaining;
 - Freedom of association and trade union affiliation.
- c. The Supplier must prohibit any form of workplace harassment, including abuse or discipline by physical means, threats of physical violence, sexual or other forms of harassment and verbal abuse.
- d. The Supplier shall:
 - Compensate employees in accordance with wage legislation;
 - Reward self-employed people at market rates;
 - Respect working hours from the point of view of (health and safety) legislation;
 - Ensure a safe working environment;
 - Employ only workers entitled to work in the country.

4. Safety, health and well-being in the workplace

- a. The Supplier must provide a safe and healthy working environment for all employees, taking into account the specific hazards/risks of each activity, and take action to minimise the causes of hazards inherent in the working environment and implement measures to protect vulnerable population groups.
- b. Circet requires its Suppliers to comply with all applicable international standards, national regulations and laws to ensure a safe and healthy workplace for its employees and prevent the risk of accidents or occupational diseases.

5. Information security

- a. Notwithstanding any processing agreement established between the Supplier and Circet, if the Supplier receives data from Circet or its client, in order to comply with obligations, the Supplier shall treat it in accordance with the General Data Protection Regulation (GDPR) as well as national legislation on privacy, data security and telecommunications for the prevention of, inter alia
 - Loss of private data of (end) customers;
 - Unauthorised access to employee data;
 - Intellectual property theft and/or identity theft;
 - Unprotected personal financial data.
- b. The Supplier shall also take necessary and minimum cybersecurity measures (e.g. firewall, anti-virus application, 2-factor authentication, password policy, etc.). The Supplier shall strive to bring the measures into line with the requirements for ISO27001 certification as much as possible. To the extent applicable, the Supplier shall comply with the NIS2 legislation and regulations.
- c. If at any time this security is compromised, the Supplier shall act promptly and responsibly and inform Circet immediately.

6. Consumer safety

The Supplier supplying products to Circet will ensure that products do not contain hazardous substances as referred to in the EU Directive on the 'Restriction of Hazardous Substances' and in related national legislation. The Supplier will make all necessary efforts to ensure consumer safety.

7. Environment and climate

- a. Recognising the urgency of climate change and the emerging climate crisis, Circet is committed to environmental protection. Reducing greenhouse gas emissions is a key strategic priority. Circet's carbon reduction targets have been validated by the Science Based Targets initiative (SBTi - <https://sciencebasedtargets.org/>).
- b. The Supplier recognises and respects the environment in its business operations and constantly seeks ways to minimise the impact of its business activities on the environment as much as possible.
- c. Circet expects its Suppliers to prioritise working to reduce their own carbon footprint and transition to renewable energy sources
- d. The Supplier must report and disclose complete, consistent and accurate data on Scope 1 and 2 greenhouse gas emissions.
- e. The Supplier will strive to recycle, reuse and redeploy by adapting existing products and processes. The Supplier will dispose of its waste in an environmentally friendly manner.
- f. The Supplier will strive to reduce consumption of energy (e.g., electricity, fuel), water, raw materials and environmentally unfriendly technologies and processes.
- g. The Supplier must at all times act in compliance with all applicable laws and regulations relating to waste, energy, emissions, noise and hazardous substances.

8. ESG

- a. Supplier will make efforts and cooperate to support Circet in its stated ESG (Environment, Social and Governance) objectives.
- b. Each Supplier is expected to share information with Circet in a manner that enables Circet to comply with the relevant requirements of the EU CSRD reporting requirements (<https://eur-lex.europa.eu/eli/dir/2022/2464/oj>).
- c. Circet is committed to having a positive impact on the communities in which we operate. We encourage our Suppliers to be involved in local communities in a responsible and respectful manner and to make a positive contribution to the social and economic development of these communities.

9. Business Ethics & Anti-corruption

- a. The Supplier will conduct its business activities in accordance with relevant competition laws and regulations in the countries in which it operates.
- b. The Supplier will refrain from unethical behaviour such as, extortion, and bribery. Instead, the Supplier shall endeavour to prevent all possible forms of corruption.
- c. The Supplier, its employees and its representatives shall refrain from directly or indirectly participating in or encouraging behaviour that could be construed as corruption or bribery of a public official or any other party (e.g. company managers, executives, ...) that may influence a decision. The Supplier shall comply with the Circet code of conduct against corruption which can be accessed via the following link: https://www.circet-benelux.eu/benelux/CBNL_Gedragcode_NL_final-layout.pdf
- d. If the Supplier or its employee is a victim or witness of unethical or inappropriate behaviour in the performance of the services, this can be reported via Circet's signalling platform, which can be accessed via the following link: <https://circet-benelux.signalement.net/>
- e. The Supplier must be honest, direct and truthful in its relationship and communication with Circet and must avoid any inappropriate behaviour and conflicts of interest.

10. Responsibility within the supply chain:

Suppliers are expected to ensure that their supply chain meets the same high standards as set out in this Code of Conduct. This includes:

- Encouraging Suppliers further down the chain to embrace these principles;
- Being transparent about origins and practices within their supply chain

11. Miscellaneous

- a. Circet and the Supplier will review the Code of Conduct and actively seek ways to continuously improve it, both in terms of content and in extending compliance to Suppliers.
- b. Circet may reconsider its relationship with a Supplier that does not comply with the Code of Conduct. A Supplier that cannot (fully) comply with the Code of Conduct must inform Circet of the non-compliance and indicate whether it will comply in the future and when.
- c. Upon request, the Supplier will provide relevant information relating to topics in the Code of Conduct to Circet within a reasonable time.
- d. The Supplier shall inform its employees and Suppliers of its compliance with the Code of Conduct and shall endeavour to ensure that their supply chain also accepts the provisions of this Code of Conduct.
- e. Circet may monitor the use and conditions of the Code of Conduct and may audit a Supplier for compliance. The Supplier will improve compliance based on the results.