

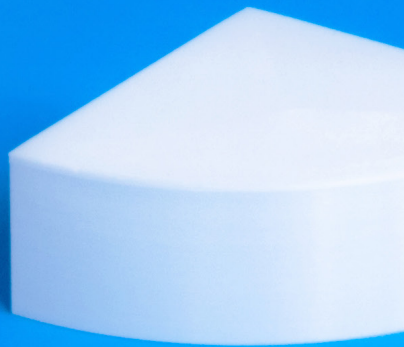
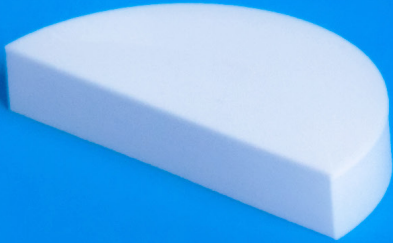


Business Partners Code of Conduct

CCV Group B.V.*

Version : 2.0
Date : 26 March 2024

*CCV Group B.V. includes all legal entities of CCV



Introduction

At CCV we act on our corporate responsibility, taking into account our social and environmental impact, value chain management, business ethics, governance and corporate citizenship. We believe that together with our Business Partners and Business Partners we have a shared responsibility for establishing higher standards for corporate sustainability. In line with our commitment to due diligence and sustainable value chain management, we expect our Business Partners to adhere and comply with the principles of ethical corporate behaviour informed by CCV's Business Partners Code of Conduct.

The Business Partners Code of Conduct supports CCV's sustainability vision. It is informed by the company's CSR Charter, the Ethical Value Chain and Business Relations Charter and our Environmental Charter. The Business Partners Code of Conduct is compliant to the international legislation for human rights, labour, environmental impact and ethical business management, as informed by competent organisations and international agreements. CCV's sustainability agenda is aligned to the UN Global Compact (UNGC) principles for responsible business. Our value chain and due diligence management system is aligned to the the UNHR Guiding Principles on Human Rights and the OECD Due Diligence Guidance for Responsible Business Conduct.

We find it equally important to act on our Environmental, Social Governance (ESG) responsibility in full transparency. For that, in addition to publishing our annual ESG report, we disclose our progress on Ecovadis, an international assessment platform for corporate sustainability, and we communicate our progress (COP) to the UNGC. We encourage our Business Partners to join the community of companies who adhere to internationally recognised disclosure standards and who promote transparency and accountability in the supply chain.

The Business Partners Code of Conduct defines the basic principles for business conduct in five sections:

1. Social responsibility (Art. 1-8)
2. Governance and business ethics (Art. 9-19)
3. Environment (Art. 20-22)
4. Value Chain and due diligence (Art. 23-24)
5. Corporate citizenship (Art. 25)

Content

Introduction	3
A. Social responsibility	6
Art. 1. Compliance to local, national and international legislation	6
Art. 2. Forced and compulsory labour, child labour and modern slavery	6
Art. 3. Working times, remuneration and leave	6
Art. 4. Employment safety	6
Art. 5. Right to organise and collective bargaining	6
Art. 6. Occupational health and safety	6
Art. 7. Equality and equity in opportunities and treatment	7
Art. 8. Diversity, inclusion and anti-discrimination	7
B. Governance and business ethics	8
Art. 9. Anti-corruption	8
Art. 10. Bribery, extortion and gifts	8
Art. 11. Money laundering and financing of terrorist activities	8
Art. 12. Competition and antitrust	9
Art. 13. Data protection and privacy	9
Art. 14. Consumer interest and integrity of goods and services	9
Art. 15. Whistle blow	9
Art. 16. Corporate accountability, transparency and disclosures	9
Art. 17. Conflict of interests	9
Art. 18. Insider trading	9
Art. 19. Provision of site health, security and safety	9
C. Environment	10

Art. 20. Climate action	10
Art. 21. Natural resources and biodiversity	10
Art. 22. Waste management and circularity	10
D. Value chain	11
Art. 23. Procurement standards	11
Art. 24. Due diligence	11
E. Corporate citizenship	12
Art. 25. Community and international engagement	12
Integration into business as usual	12
Whistleblower system	12
Stakeholder acknowledgement	13

A. Social responsibility

The section refers to the social responsibility and the impact a company is considered to have on people. In this Business Partners Code of Conduct, we refer to human rights and labour, diversity, inclusion, and anti-discrimination, among others. We expect our Business Partners to comply with the basic standards for the aforementioned topics, and to act on their responsibility as ethical employer. This chapter connects to the UNGC principles 1-5.

Art. 1. Compliance to local, national and international legislation

Business Partners will abide by the applicable local, national and international laws regulating human rights and labour standards. In terms of demographic groups, this recognition also applies to the rights of minorities, indigenous people and migrant groups. We expect our Business Partners to align their operations to the 30 articles of the Universal Declaration of Human Rights and the labour standards informed by the International Labour Organisation (2019).

Art. 2. Forced and compulsory labour, child labour and modern slavery

Business Partners will respect all labour rights as human rights. Consequently, the Business Partners will support the effective abolition of forced and compulsory work, child labour or other forms of modern slavery. Business Partners are to continuously monitor, identify and eradicate any deviant cases that violate human and labour rights.

Art. 3. Working times, remuneration and leave

Business Partners will comply to the national legislation regulating working hours, compensation and leave. This should ensure an equitable and healthy life-work balance for all employees. In case of approved atypical work hours, the Business Partners will ensure close monitorization, guidance and compensation. Employment of underaged employees will be done strictly according to the law limiting the number of working hours and the payment regulations. Enrolment of youth into employment should not bring any prejudice or facilitate any unlawful, unethical or abusive employment relations.

Business Partners will transparently inform on terms of employment, benefits and responsibilities, salary grids, and parameters for promotion for employees at all levels, at our request. Business Partners will also ensure that employees will be allocated the number of paid days of leave according to the national regulations and a comprehensive approach to needs-based leave. The employer will act against wage discrimination, extortion in the employment process and will promote transparency and ethical employee relations.



Art 4. Employment safety

Business Partners will not contract or engage in any underground labour, providing employees with transparent and equitable employment conditions. The termination of contract will be conducted according to the national labour legislation, ensuring no arbitrary dismissal and providing the legal notice period for the employee.

Business Partners will ensure that need-based leave such as parental or sick leave will not affect the security of employment. In the case of parental leave, this should not create any grounds for gender-based employment vulnerability. As employer, Business Partners will support the employee in transitioning back to work, providing the support system required for the transition to respect and dignify the employee's needs.

Art. 5. Right to organise and collective bargaining

Business Partners will ensure the employees' right to establish or join trade unions, as per the applicable industry and national legislation. This also includes employees' right to join and/or be represented by labour unions for the purpose of collective bargaining, representation, negotiation and agreements for terms of employment.

Art. 6. Occupational health and safety

Business Partners will ensure that the workspace corresponds from an occupational health and safety standpoint. This includes facilities, equipment and training that allow employees to perform their work safely. Occupational health and safety also includes access to clean water and suitable sanitary groups, break times, furniture ergonomics and management of waste including hazardous/toxic substances in the workplace. Business Partners will ensure continuous monitoring and improvements to meet the national and international standards for occupational health and safety.

Art. 7. Equality and equity in opportunities and treatment

Business Partners will ensure the provision of human and labour rights, and equal grounds for hiring, remuneration, training, career advancement and employment termination. Business Partners will ensure that all employees are assisted in fulfilling their work with integrity, providing the necessary resources required by the employees' needs. Business Partners will also work to identify and integrate employee groups prone to vulnerability and discrimination (e.g. gender minorities groups, indigenous peoples etc.). Employees should be treated equally and equitably in terms of access to resources and opportunities, ethical recruitment employment conditions, professional development and promotion.

Art. 8. Diversity, inclusion and anti-discrimination

Business Partners are to apply a zero-tolerance policy for discrimination on any grounds, including age, gender, colour, sexual orientation, political and religious view, ethnic group, cultural background, language, country of origin, etc. This applies to employer-employee relations, to exchanges between employees and between employees and other stakeholders with whom the company is in business relations. As an employer, the Business Partners are expected to ensure methods and tools to identify, mitigate and react to any cases harassment and abuse, and to support diversity and inclusion for all employees.

2. Governance and business ethics

The section refers to a company’s ethical business behaviour regarding its governance systems and stakeholder relations. Business Partners are expected to comply with the corporate laws and to apply the principles of transparency and accountability in their internal and external procedures and stakeholder relationships. This section connects to the UNGC principle 6.

Art. 9. Anti-corruption

Business Partners will ensure necessary policies and procedures to act against corruption and money laundering within their operations and business relations. Business Partners will ensure the necessary means to inform their stakeholders about their anti-corruption control system upon our request. Deviations will be monitored and acted upon immediately.

Art. 10. Bribery, extortion and gifts

Business Partners will not engage in any unethical acts of bribery, extortion and exchange of gifts. This involves bribery of local officials for unlawful win on bids and public contracts, tax benefits and tax evasion, for access to data, and/or to obtain customs clearance, authorizations, permits, to avoid regulations and controls. Business Partners are not to engage in any commercial activity that involves benefiting and sharing unlawful profits and will not give/receive gifts to and from Business Partners without control systems.

Art. 11. Money laundering and financing of terrorist activities

Business Partners will ensure the necessary systems in place for combating and avoiding any risks associated with the financing of terrorist activities and money laundering. These can be defined as acts that disguise the true origin and destination of money. Business Partners are expected to create a mandate for assessing, identifying, acting on and monitoring any risks associated with this topic of business ethics.





Art. 12. Competition and antitrust

Business Partners are expected not to engage in any anti-competitive practices and instead to engage in fair market practices and to abide by the competition and antitrust laws. Anti-competitive principles prohibit competitors from engaging in any agreements for bids, prices and market manipulation.

Art. 13. Data protection, privacy and disclosure of information

Business Partners are expected to implement an effective process for data protection, privacy and disclosure of data. This entails all required policies and procedures that protect and regulate data use, privacy, confidentiality and disclosure, according to the applicable national and international law. We require our Business Partners to use our data or information provided exclusively within the agreed scope of the business relationship, unless explicit written consent has been given for other purposes. Confidential information must be protected from internal and external misuse and may not be published without authorization, disclosed to third parties or made publicly accessible in any other form.

Art. 14. Consumer interest and integrity of goods and services

Business Partners are expected to provide accurate, verifiable and comprehensive information that support the customers making the best choice, fulfilling their needs, and safeguarding their health and safety. Whenever applicable, this entails information about manufacturing, composition and safe use, maintenance, storage and disposal. Business Partners are to meet and comply with the legal requirements for product information disclosure concerning health, safety, and warnings and environmental impact.

Art. 15. Whistle blow

Business Partners are to provide whistle blow channels that allow internal and external stakeholder to report any concerns regarding human and labour rights, business integrity or environmental concerns, anonymously, confidentially and without retaliation. Deviant cases reported through the whistle blow

should be subject to investigation and the company is expected to devise action according to the applicable law and internal procedures.

Art. 16. Corporate accountability, transparency and disclosures

Business Partners are to comply with national and international legislation for financial and non-financial disclosure. Reporting should address internal and external stakeholders, ensuring corporate accountability and responsible business governance. This practice also applies to the transparent communication of progress on sustainability metrics from the areas of governance and ethics, social and environmental impact and value chain management.

Art. 17. Conflict of interests

Business Partners should be free from any conflict of interests that would question their objectivity in relation to CCV. If the Business Partners doubts the possibility of being in or entering a conflict of interest with CCV, this should be raised to CCV immediately.

Art. 18. Insider trading

Business Partners should not take advantage of any non-public material information about CCV. This includes, buying and/or selling securities, taking advantage of corporate information in another way or passing it on to other external stakeholders.

Art. 19. Provision of site health, security and safety

Business Partners should ensure the health, safety and security of and on their sites and act to minimise and combat any risks that might affect CCV when on the Business Partners's sites. This also includes exposure to security threats such as terrorism, crime and pandemics. Business Partners should comply to respect CCV's or CCV's clients' health and safety procedures, whenever working on their sites. We require Business Partners to inform us immediately of any risks which they have identified and which might affect the health, security or integrity of CCV and CCV's employees.

C. Environment

The section refers to a company's responsibility towards its environmental impact of their operations and production sites. Business Partners are to assess, understand and limit their environmental footprint regarding Greenhouse Gas emissions, natural resource use, biodiversity, pollution and waste. We encourage our Business Partners to seek continuous improvements for their products and services and to adopt innovation and principles of circular economy wherever possible. This section connects to the UNGC principles 7, 8 and 9.

Art. 20. Climate action

Climate action refers to action targeted at a company's GHG emissions, as identified by the Kyoto Protocol. Adopting the three scopes of emissions, a company can calculate, set targets and take action to reduce their emissions. Climate strategies should present measures to reduce energy use and introduce renewable energy across a company's offices, production sites, fleet and increasingly into its value chain. Business Partners are expected to adopt climate strategies that aim to reduce their GHG emissions, contributing towards the targets of the UN COP21 Paris Agreement.

Art. 21. Natural resource use and impact on the environment

Business Partners should apply a precautionary approach to the use of natural resources and implement any accessible measures to limit their pressure on the environment. This refers to applying measures for reduced use of water and electricity in operations, and raw commodities in their manufacturing and shipping streams and other areas that require an intake of raw materials - such as single use, non-recyclable plastic. Business Partners should assess their impact on biodiversity and act to mitigate any risks for biodiversity degradation and contamination/pollution of land, water and air.

Art. 22. Waste management and circularity

Business Partners are to assess the waste generated from their operations, production sites and value chain. This understanding should lead to improved management systems to reduce the environmental footprint of waste. Overall, Business Partners are to uphold responsible social and environmental standards for their waste management system, including special provisions for electronic waste, as well as biological, chemical or physical hazardous and toxic waste. Business Partners are encouraged to adopt the principles of circularity concerning reduction, reuse and recycling of waste. Acknowledging the continuous research and innovation available in materials use, packaging and disposal, we encourage our Business Partners to adopt new technologies that contribute to the goal of responsible waste management.

D. Value chain

The section refers to a company's responsibility to act ethically and responsibly in relation to its value chain. This refers to downstream and upstream operations that concern both the supply, as well as the client-relations and distribution channels. Across the value chain, Business Partners are expected to implement the same social, environmental and governance standards, as the aforementioned articles addressing a company's internal operations. This section connects to the UNGC principles 1-10.

Art. 23. Procurement standards

Business Partners are expected to manage their supply chains on a risk-basis, safeguarding the financial integrity of the company, the quality and their products and services. Business Partners are expected to establish a comprehensive system based on policies, procedures, measures and reporting that would advance social, environmental and ethical standards in their value chain management. In addition, the principle for environmental precaution should be applied to raw commodities and materials sourcing, considering high risk areas and conflict minerals, according to the applicable international restriction and sanction lists.

Specifically, CCV expects the Business Partners to comply with foreign trade regulations. They act in accordance with regulations of foreign trade, tax and customs law, laws for import and export within and outside the EU, national and international sanctions and goods lists, embargoes and applicable EU regulations and directives. Business Partners should ensure that their supply chain management aligns to the regulation (EU) 2017/821 of the European Parliament and of the Council of 17.May 2017, laying down supply chain due diligence and obligations for Union importers of tin, tantalum and tungsten, their ores, and gold originating from conflict-affected and high-risk areas. We encourage our Business Partners to adhere to the EU sanctions map (<https://www.sanctionsmap.eu/#/main>), which CCV is also following.

Art. 24. Due diligence

Business Partners should act on due diligence throughout their value chain, to continuously investigate their business relations from a financial, labour and human rights and environmental impact perspective. Business Partners should not be knowingly complicit to any deviations from these standards. Business Partners are expected to adopt international standards for responsible business due diligence. Frameworks such as the OECD Due Diligence Guidance for Responsible Business Conduct (2018) should be adopted by the company throughout their Business Partners code of conduct and other policies and procedures on due diligence.



E. Corporate citizenship

The section refers to a company's extended responsibility towards its community and the society. We expect Business Partners to recognise their role and value they can drive in the society. The principle expressed below moves beyond compliance to regulations for institutional governance and value chain, into a company's voluntary act of corporate citizenship.

Art. 25. Community and international engagement

Business Partners should align their business to principles for responsible business practices, such as the ten principles enlisted by the UN Global Compact. As corporate actors with a broader impact on the society, Business Partners should take an active stand in supporting the advancement of the Sustainable Development Goals (SDG) and contribute to the sustainable development of the communities in which they operate.

Integration into business as usual

The Business Partners Code of Conduct is adopted and integrated into CCV Group B.V. procedures concerning its Business Partners. Business Partners whom have been informed by CCV, are requested to acknowledge and comply to the principles enlisted in the present Business Partners Code of Conduct. We monitor the progress on Business Partners' acknowledgement and disclose the progress on targets transparently, under our pledge for responsible and sustainable value chain management.

CCV reserves the right to cease any business relation, including existing contracts or bid process, if the Business Partners does not acknowledge and complies to respect CCV's Business Partners Code of Conduct or to provide additional information in material areas of risk, as identified in the Business Partners Code of Conduct.

Whistleblower system

Our reputation as a reputable, fair and respectful company is critical to our success. Our business development can only be ensured by individuals who place personal integrity high on their priorities. If you are aware of a violation of the principles set forth in this Code of Conduct, or if you have concerns about a suspected violation, you are encouraged to speak up. For cases where strict confidentiality or anonymity is desired, we maintain a multilingual SpeakUp Line from a neutral third-party provider (Whistleblower). This is available on the Internet or by telephone. The Whistleblower details are to be found on our website: <https://www.ccv.eu/en/about-ccv/our-story/corporate-social-responsibility/>

Stakeholder acknowledgement

I, the undersigned (first name and last name) _____
Having the role of (insert title) _____
On behalf of the company (registered company name and address) _____

Acknowledge and recognise the principles informed by CCV Business Partners Code of Conduct. As a Business Partners, we commit to respecting and complying to the principles stated by CCV Business Partners Code of Conduct.

Signature _____

Date (dd/mm/yyyy) _____

Place _____

Note!

The Business Partners Code of Conduct should be signed by a duly authorised representative of the company and sent back to your counterpart at CCV.





www.ccv.eu