
	SUPPLIERS SUSTAINABILITY POLICY	PuDoc14
Prepared by Head of Procurement	Validated by General Manager	Date: 10/02/2021
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Purpose:

Eurofitting management NV (“Eurofit”) is committed to conducting every aspect of our business ethically, with integrity and in compliance with all applicable laws.

This commitment is a source of pride and strength for Eurofit and it should be embraced by everyone affiliated with Eurofit worldwide including our suppliers, their workers, employees and their subcontractors (“Suppliers”).

This Supplier sustainability policy (the “policy”) is a key component to our ongoing commitment to integrity, trust, honesty, fair dealing and full compliance with all applicable laws and sets out the minimum standards expected from our Suppliers.

Scope:

This policy sets out minimum requirements expected from all Eurofit Suppliers.

Procedure:

1. Legal Compliance

Eurofit expects all its Suppliers to (i) abide by applicable recognized international standards in addition to complying with the standards set out in this Code; (ii) communicate the principles in this Code to their employees, suppliers and supply chain; (iii) conduct regular assessments (including of third parties) against this Code and maintain records to demonstrate compliance with the principles set out in this Code; and (iv) work with Eurofit to evaluate performance against this Code and take corrective action if concerns are found. Suppliers must in all cases comply with all national laws and regulations and if there is any conflict between the principles in this Code and national laws and regulations, then Suppliers should comply with whichever sets the higher standard.

2. Minimum Labour Standards

Modern Slavery

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour, child labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain. Eurofit has a zero-tolerance policy approach to modern slavery.

The prevention, detection and reporting of modern slavery in any part of Eurofit's operations is the responsibility of everyone affiliated with us. Suppliers are encouraged to raise concerns about any issue or suspicion of modern slavery in any part of Eurofit's business or supplier tier at the earliest possible stage.

Forced Labour

Suppliers must not use or permit the use of forced, bonded or compulsory labour. This includes labour involving coercion, direct threats of violence or more subtle forms of compulsion.

In addition, employees of Suppliers must not be required to lodge deposits of money or identity documents with any Supplier (or their employer) and must be able to leave their employment voluntarily and freely without threat to themselves or their families.

Child Labour

Suppliers must not use, employ or permit any child to perform labour (being a person below the local legal minimum age for labour) and, in any event, shall comply with the principles of the International Labour Organization's Conventions and Protocols, in particular Convention No. 138 concerning the minimum age for admission to employment and Convention No. 182 concerning the worst forms of child labour.

Suppliers will endeavor to protect every child from economic exploitation and from performing any work that is likely to interfere with a child's education or otherwise be harmful to a child's development.

Freedom of Association

Subject to applicable laws, Suppliers must freely allow employees to form or join labour unions (or similar outside representative organizations) to bargain collectively should they wish to do so.

Suppliers shall have an open attitude towards unions, union activities, and union representatives. Employees should be able to express concerns about working conditions without threats of reprisal or harassment.

Health and Safety

Suppliers shall provide all employees with a safe, healthy working environment in accordance with applicable laws and regulations and having consideration for the industry and of any specific hazards. Minimum standards include employee access to clean toilet facilities, drinking water and, if applicable, accommodation and clean facilities for food storage.

Suppliers shall, where appropriate, engage with employees regarding health and safety issues related to their roles and provide employees with training, including providing personal protective equipment ("PPO"), where appropriate, to minimize the health and safety risks associated with their roles.

Equal Opportunities, Non-Discrimination and Diversity

Suppliers must have a policy that strictly adheres to all applicable laws and regulations relating to equal opportunities in the workplace.

Suppliers' policies must also comply with all applicable laws and regulations prohibiting unlawful discrimination in employment decisions relating to recruitment, pay and benefits, promotion, access to training, employee

dismissal or other contractual termination or retirement based on any characteristic which is protected by national or local law, for example race, colour, nationality, gender, ethnicity, caste, sexual orientation, marital status, religion, political affiliation, nationality, social origin, social status, indigenous status, disability, age, pregnancy or union membership.

Disciplinary Practices

Suppliers must treat all employees with respect and dignity. Suppliers must not engage in any physical or verbal abuse of employees, including unlawful harassment or other conduct which may be offensive or violate their dignity.

Working Hours

Suppliers shall comply with applicable laws relating to working, working time and rest breaks.

Suppliers shall allow employees and workers to take at least one day off per seven-day week.

Wages and Conditions of Employment

Terms and conditions of employment (including wages) shall be presented to employees in a clear comprehensible manner and must be lawful and otherwise reasonable.

Suppliers shall ensure wages and benefits at least meet national legal standards or industry or local labour market standards, whichever is higher. Overtime wage rates should exceed normal wage rates, or otherwise comply with national or local law.

3. Environment Standards

Suppliers must comply with all local laws and regulations in respect of the environment and local resources. Suppliers shall endeavor to ensure that all activities are conducted in a manner that is responsible and minimizes its impact on the environment and conserves resources, while maintaining appropriate commitments to quality.

Suppliers shall have processes and policies in place to (i) actively improve the efficient use of finite resources (energy, water, raw materials); (ii) minimize the release of harmful emissions in the air and the impact of products and services on the environment; (iii) ensure all waste materials are disposed of properly in an environmentally responsible manner and (iiii) manage responsibly all chemicals.

4. Bribery and Corruption Standards

Eurofit takes a zero-tolerance approach to bribery and corruption and is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates. Corruption includes offering, promising, giving or accepting, directly or indirectly, payments of money or of goods or services to any other person for the purpose of influencing a decision or act of that person or another or to induce them to do something which is dishonest, illegal, unethical or a breach of trust or contrary to an expectation of good faith or impartiality. Eurofit is also committed to implementing and enforcing effective processes to prevent and detect bribery and corruption. Eurofit will uphold all laws relevant to preventing and detecting bribery and corruption in all the jurisdictions in which Eurofit operates.

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Suppliers undertake to have a similar commitment to bribery and corruption and have similar policies and processes in place to prevent and detect bribery and corruption. Suppliers are encouraged to notify Eurofit if it has fair reason to believe that Eurofit or any party affiliated to Eurofit acts contrary to this commitment.

5. Whistleblower protection

Suppliers should encourage employees to report any violations or suspected integrity violations. They should have a whistleblower policy in place creating a safe and confidential environment for employees to make such report. Retaliation against any employee who in good faith reports a concern to the company about illegal or unethical conduct cannot be tolerated and should be subject to disciplinary actions.

6. Conflict of interest

Suppliers should enforce a conflict of interest policy covering professional or business related conflicts such as personal financial interest and outside business activities; personal relationships and public mandate

7. Fair competition and antitrust

Suppliers should define and pursue their commercial activity in total autonomy with respects to competitors.

Suppliers should not engage in any illicit behavior, involving:

(a) understandings, whether horizontal (between competitors) or vertical (between parties operating at a different level of the supply chain), consisting of agreements, agreed practices or decisions by an association of businesses in which two or more businesses adhere to a common strategy to limit their autonomous conduct in the marketplace.

(b) acts of abusive use of a dominant position,

(c) operations of concentration without having obtained legal authorization.

(d) exchanges of confidential information with its competitors except within the limits of what is permitted by the applicable regulations.

8. Management systems

Suppliers are expected to implement management systems to comply with all applicable laws. Suppliers should maintain books and financial records reflecting transaction in an accurate, honest and timely way. Suppliers should employ appropriate quality audit and compliance processes

9. Global trade compliance

Suppliers should never seek to mislead or improperly or illegally avoid the payment of import duties, taxes and fees, and never engage in activities meant to evade the legal requirements of international traffic and trade. Suppliers should know with whom they are dealing and must not engage or facilitate business with entities or individuals specifically prohibited by law. Furthermore, suppliers should be aware of and comply with, restrictions on dealing with entities and individuals located in countries that are subject to trade embargoes and economic sanctions imposed or followed by the European Union.

10. Breach of this Code

Eurofit may terminate its relationship with any Supplier or other entity working on Eurofit's behalf if they breach this Code.

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Distribution list: All suppliers through contracts and PO (website); Management team; plant managers