

# We are Fudura

Change comes first. That is our mission. We do this by helping organisations make further progress with their sustainable ambitions. We have been doing this for decades by helping our customers with smart energy infrastructure, savings and future-proof innovations.

The social interest weighs heavily in Fudura's business operations. Business operations based on correct standards and values and sustainability are anchored in our strategy. We ask the same from our suppliers

## Fudura Supplier Code of Conduct

## Foreword

As Fudura, we continuously reduce our own ecological footprint. We reuse as much of our own materials as possible and work emission-neutral by reducing our emissions, using green energy and compensating for the remaining emissions. We continuously strive to reduce energy consumption in our buildings, sustainable transport for our employees and reduce energy consumption in the chain. Based on **social entrepreneurship**, we ensure that our organisation becomes increasingly sustainable. To achieve our business goals, we work with suppliers who, like Fudura, attach great importance to corporate social responsibility. For more information, please visit our website: <https://www.fudura.nl/en/we-are-fudura>.

## Applicability and Purpose

This supplier code of conduct applies to all suppliers, subcontractors and business partners who supply products and/or services to Fudura, hereinafter referred to as "Supplier" or "Suppliers".

This code of conduct describes a number of principles regarding corporate social responsibility applied by Fudura and that Suppliers must comply with. By entering into an agreement with Fudura, the Supplier commits itself not only to the obligations set out in the agreement, but also from this code of conduct. We encourage independent third-party certification with regard to human rights, environmental and ethical principles as set out in this Code of Conduct.

Suppliers must pass on the principles arising from this code of conduct to their own suppliers, subcontractors or business partners, so that these principles are widely supported within Fudura's value chain. Suppliers will also identify actual or potential negative effects in their value chain and prevent, limit, remedy or eliminate them and follow all reasonable instructions from Fudura to this end. Suppliers will confirm to Fudura (at the latter's request) that the principles of these codes of conduct have been implemented and provide Fudura with all information regarding the actual or potential negative effects and the measures taken by the Supplier.

## Principles

### 1. Laws and Regulations

Under all circumstances and as an absolute minimum, the Supplier complies with all applicable laws and regulations at all times. The same applies to applicable environmental, labour, health and safety regulations as set out in this code of conduct. We expect our Suppliers to have the correct permits, certifications and documentation in place to supply products and/or services to Fudura.

### 2. Human Rights

The Supplier respects and protects human rights at all times. This includes ensuring equal opportunities, the right to freedom of association and collective bargaining and the prevention of any form of abuse, including physical, mental or sexual abuse. The Supplier will respect all human rights standards, including those laid down in the International Labour Organization (ILO).

#### Anti-Discrimination

The Supplier ensures that no form of discrimination will take place. Suppliers do not discriminate on the basis of age, nationality, race, gender, religion, ethnic background, nationality, medical conditions, disability, sexual orientation, etc. From the selection of applicants to the terms and conditions of employment and/or grounds for dismissal.

#### Working Conditions

The Supplier ensures safe and fair working conditions for its employees. Measures are taken to promote and guarantee working conditions, safety measures and facilities, measures for specific risk groups and the handling of hazardous substances. The Supplier prevents and/or terminates potential violations of labour standards related to its own activities, products or services or those associated with the Supplier. The Supplier promotes diversity in the workplace, with equal opportunities for everyone.

The Supplier does not use any form of forced labour, slavery or human trafficking. The Supplier offers its employees reasonable working hours, fair wages and sufficient social security and does not require its employees to work without pay. The Supplier's employees are treated with respect and dignity and are entitled to maximum working hours and paid holidays as established by local law.

The Supplier offers its employees a whistleblower scheme or the right resources to report (imminent) abuses, without having to worry about sanctions in any form.

### Child Labour

The Supplier complies with all applicable laws and regulations regarding child labour and will not employ persons under the legal minimum age. On Fudura's demand, the supplier confirms that no activities are carried out using child labour and that it adheres to the United Nations Universal Declaration of Human Rights.

### Health and Safety

The Supplier provides a healthy and safe working environment for its employees, suppliers, subcontractors and business partners who work at the Supplier's locations. Locations are hygienic and safe and meet the basic needs of employees or third parties working at such a location. Any dangerous situations or accidents will be investigated by the Supplier and prevented in the future.

## **3. The Environment**

The Supplier ensures that its products and/or services have a minimal negative impact on the environment and that its own footprint is continuously reduced. This includes minimising environmental damage, reducing waste, introducing recycling, making wise use of natural resources (including fossil fuels, water, minerals and wood) and implementing energy saving and emissions reduction measures. The Supplier seeks cost-effective methods to improve its energy efficiency and minimise energy consumption and greenhouse gas emissions.

The Supplier complies with all relevant environmental legislation, international standards and the necessary environmental permits, approvals and registrations. The Supplier will obtain and retain these. Where relevant, the Supplier informs local communities about environmental, health and safety issues arising from the Supplier's business activities.

The Supplier has implemented a policy that creates awareness of the environmental risks and an environmental management system aligned with international standards, such as ISO14001 or the Eco Management Audit System (EMAS).

Suppliers that have a significant impact on the environment take measures to prevent pollution in accordance with common international standards. Chemicals, waste and other materials that pose a risk to society or the environment must be identified, labelled and managed to ensure safe handling, movement, storage, use, recycling, reuse or disposal. Such chemicals, waste or other materials are avoided and minimised where necessary. Suppliers with a significant impact on the environment are also required to have procedures in place for reporting emergency situations to the relevant authorities.

## **4. Integrity**

### Anti-Corruption

The Supplier is expected to maintain fair business practices and comply with all applicable anti-corruption laws and regulations. The Supplier will not offer, promise, commit or allow money or valuables to be given to government officials or third parties to influence decision-making or receive gains. The Supplier has an anti-corruption policy in place that prevents any form of bribery or corruption and it ensures that its employees, subcontractors and business partners comply with this policy.

### Fair Competition

Fair competition is fundamental. The Supplier complies with competition laws and regulations, including the obligation not to exchange commercially sensitive or strategic business information with competitors. All agreements with competitors or third parties that could have competitively sensitive agreements must be approved by a legal expert to rule out any competition conflict.

### Money Laundering and Fraud

The Supplier does not participate in any form of money laundering and will only work with reliable customers, subcontractors and business partners who operate legally and whose funds and cash flows come from valid sources. The Supplier acts in accordance with international standards and laws regarding fraud or money laundering.

### Conflicts of Interest

The Supplier prevents all conflicts of interest that may arise and that could damage the confidence of third parties in Fudura.

### Export Monitoring, Restrictions and Sanctions

The Supplier complies with applicable laws and regulations regarding export monitoring, trade restrictions and (economic) sanctions. The Supplier will comply with applicable boycott legislation and generally accepted trade restrictions.

### Protection of (Personal) Data and Security

The Supplier complies with applicable laws and regulations regarding the processing of personal data, security and/or other statutory requirements when processing data as part of the products and/or services provided to Fudura. The Supplier will treat all information (including personal data) relating to Fudura's employees or its customers as confidential information. This information will not be shared with employees, subcontractors, business partners or any other third party if this is not necessary to fulfil its obligation pursuant to the agreement with Fudura. On Fudura's demand, the Supplier will return all data, information carriers, documents, software or copies thereof belonging to Fudura. Security measures are aimed at preventing unauthorised access to confidential information, and the measures to be taken to prevent access are in accordance with the usual standards in the relevant market.

### **5. Reporting, Monitoring and Audits**

The Supplier must monitor compliance with this code of conduct and, on Fudura's demand, report on how it complies with this code of conduct. Insight is provided into performance, criteria, positions and choices that are made. If the Supplier cannot comply with this code of conduct, it will immediately report this to Fudura. The Supplier will identify any risks and immediately correct shortcomings. Each notification of a shortcoming is accompanied by the measures taken to remedy the shortcoming and/or prevent it in the future. A violation of this code of conduct is a serious violation of the agreement between the Supplier and Fudura. The Supplier gives Fudura permission to use the content of the Supplier's reports in its financial statements and/or management report, so that Fudura can fulfil its obligations in the field of sustainability reporting.

The Supplier will grant Fudura access to all information and/or buildings necessary to check compliance with this code of conduct. Audits may be carried out by an independent third party under strict confidentiality.

**Closing Words**

This code of conduct applies to every Supplier with which Fudura does business. The code of conduct can also be consulted at <https://www.fudura.nl/en/we-are-fudura/csr>. Fudura is entitled to amend this code of conduct at any time if it sees reason to do so. Fudura also has the right, without prejudice to Fudura's rights pursuant to the agreement with the Supplier, to take any disciplinary measures against the Supplier deemed appropriate by Fudura. Fudura will proceed with care and observe fundamental principles.

**Together we create a better and more sustainable world.**

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Beert Wassenaar  
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