

Supplier Code of Conduct IPCOM Group

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1 Introduction

IPCOM Group is committed to conducting business with the highest standards of ethics, integrity, and social responsibility. We believe that our suppliers play a crucial role in helping us achieve this goal. Therefore, we have developed this supplier code of conduct to establish clear expectations for our suppliers regarding their social, environmental, and ethical responsibilities.

This code of conduct sets forth the minimum standards that our suppliers must meet when conducting business with us. It covers a range of topics, including labour and human rights, environmental responsibility, anti-corruption, and bribery. By complying with this code of conduct, our suppliers can help us ensure that our products and services are produced in a socially responsible and sustainable manner.

We expect our suppliers to familiarize themselves with this code of conduct, and to ensure that their own suppliers and subcontractors comply with it as well. We also expect our suppliers to work collaboratively with us to address any issues that may arise, and to continuously improve their social, environmental, and ethical performance.

We believe that compliance with this code of conduct is essential to building a responsible and sustainable supply chain that benefits all stakeholders. We are committed to working with our suppliers to ensure that they meet the standards set forth in this code of conduct, and to continuously improve our collective environmental, social, and ethical performance.

1.1 Scope

This Supplier Code of Conduct applies to all entities, including companies, individuals, or any other business partners that supply goods or services to IPCOM, including all IPCOM Group companies (hereafter “IPCOM”).

All suppliers must comply with this code of conduct and ensure that their own suppliers and subcontractors comply with it as well.

2 Human and labour rights

2.1 Labour conditions

IPCOM believes that fair wages and benefits are essential to ensuring the well-being and dignity of workers, as well as to supporting a sustainable and ethical supply chain. We expect our suppliers to comply with all applicable laws and regulations related to wages and benefits, and to provide their employees with fair and competitive compensation packages.

Our suppliers shall pay all employees at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits.

2.2 Child labour

Child labour is strictly prohibited. IPCOM does not use child labour in any of the global operations or facilities. We expect suppliers to uphold the same standards. The supplier cannot tolerate any form of child labour and must refrain from engaging in any form of child labour in their business operations, in line with the International Labour Organization's (ILO) core labour standards.

2.3 Health and safety working conditions

IPCOM is committed to providing a safe and healthy work environment for all employees, including those of our suppliers. Therefore, we expect our suppliers to prioritize the health and safety of their employees and to take appropriate measures to prevent accidents, injuries, and illnesses in the workplace.

2.4 Diversity and inclusion

A diverse team provides access to a wider range of skill sets, experiences and different ways of thinking. It drives performance, innovation, and business growth. At IPCOM, we create diverse and inclusive workplaces, where everyone can contribute towards the company's mission, vision, and goals. We strive to provide a workplace that is free from all forms of harassment and intimidation, where every employee feels valued and empowered to achieve success.

Also our suppliers need to commit to diversity and inclusion. The supplier must not discriminate against any employee or job applicant based on a person's race, colour, gender identity, marital status, sexual orientation, age, disability, or any other legally protected status.

2.5 Learning and development

Within IPCOM, continuous learning and development are key to ensuring a skilled and engaged workforce, as well as to promoting long-term business success. Therefore, we expect our suppliers to invest in the ongoing training and development of their employees, and to provide opportunities for career growth and advancement.

3 Environment

3.1 Carbon footprint

With a product portfolio of insulation solutions, we help our customers to reduce emissions and improve energy efficiency. We also want to reduce our own carbon footprint. Because it is everyone's responsibility to reduce CO2 emissions instead of shifting it to society and future generations.

Our IPCOM entities are setting an example on climate action, for example by switching energy systems from fossil fuels to renewables like solar, investing in LED-lighting and other actions.

IPCOM carries out an annual Carbon Footprint assessment (Scope 1, 2 and 3) in order to increase our own energy efficiency and to reduce our climate impact. Action is required by each and every one of us, also by our suppliers. We expect an active engagement from our suppliers to minimize their greenhouse gas emissions and climate impact. This includes actions such as improving energy efficiency, adopting renewable energy sources, optimizing transportation and logistics practices.

3.2 Waste and proper handling and disposal of hazardous materials

IPCOM is committed to reduce the amount of waste from our operations and reusing and recycling materials when possible. As part of our commitment to sustainability and safety, we properly identify and handle hazardous materials, chemicals, and substances.

Suppliers must adhere to all applicable laws and regulations regarding the safe handling, movement, storage, recycling, reuse, and disposal of such materials. In addition, suppliers must comply with material restrictions and product safety requirements established by relevant laws and regulations. We expect our suppliers to ensure that key employees receive appropriate training in product safety practices.

4 Business ethics

4.1 Anti-bribery and anti-corruption

IPCOM has a Compliance, Integrity, Anti-Fraud and Anti-Corruption Policy and reporting mechanisms in place to protect the business and its personnel and to ensure compliance with applicable anti-fraud, anti-corruption and other laws and regulations. All personnel are made aware of this policy by completing an e-learning.

Our suppliers will adhere to all applicable local laws and international anti-corruption conventions, and refrain from engaging in any form of corrupt practices. The supplier in no case should offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party.

4.2 Gifts and hospitality

IPCOM and its suppliers should only give or accept gifts and/or hospitality where it is reasonable, proportionate, and appropriate in the circumstances, and never in order to secure any improper advantage, or to materially influence a business decision. All gifts, hospitality and other advantages offered or received as a result of a business context and relationships, must comply with IPCOM's Compliance, Integrity, Anti-Fraud and Anti-Corruption Policy.

4.3 Anti-money laundering

IPCOM's suppliers must comply with all applicable laws and regulations regarding money laundering and must not acquire, use, convert, conceal, or possess the proceeds of crime or help another person to do so. The suppliers need to take steps to prevent the use of their products or services for illicit purposes.

4.4 Fair competition

At IPCOM, we believe in fostering a competitive marketplace that promotes fair and ethical business practices. The suppliers are required to compete ethically and must act in compliance with all anti-trust and competition laws applicable to their business.

We will not tolerate any form of unethical or anti-competitive behaviour from our suppliers.

4.5 Confidentiality of information

IPCOM strives to optimal information security and processes data according to the GDPR standards.

We have set a range of minimum requirements and procedures that must be in place in all subsidiaries to meet the IPCOM standards on ICT security. An e-learning regarding ICT security risks and a safe online behaviour is completed by all personnel.

It is IPCOM's expectation that suppliers will uphold the intellectual property rights of third parties and avoid any unauthorized use or disclosure of confidential information in violation of legal or contractual obligations. IPCOM expects that their suppliers organize adequate ICT security.

4.6 Whistle-blower protection

As part of our commitment to ensure a safe and respectful workplace, we require that suppliers establish an effective mechanism for employees to report workplace complaints and violations, in compliance with all relevant local laws and regulations. In particular, the supplier must ensure that whistle-blowers are protected from retaliation, and that their identities and complaints are kept confidential.

5 IPCOM requires compliance with the supplier code of conduct

To ensure ethical practices and standards are upheld, IPCOM requires its suppliers to comply with its Supplier Code of Conduct. Suppliers are responsible for creating and maintaining a process that enforces this Code.

Suppliers must also commit to complete a Supplier Self-Assessment questionnaire and to provide supporting documentation where required.

This Supplier Code of Conduct may be updated by IPCOM from time to time. All references herein to the IPCOM Supplier Code of Conduct refer to the most current version of this Supplier Code of Conduct, available at <https://www.ipcom.be/>.

Supplier confirms by signature below that Supplier complies with the IPCOM Supplier Code of Conduct:

Supplier Name:

Representative Name and Position:

Date and Signature:

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