



Business Partners Code of Conduct

CCV Group B.V.*

Version : 3.0
Date : 30 October 2025

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



CCV Business Code of Conduct



At CCV, we are continuously working to improve our sustainability performance and to walk the talk on business ethics and integrity through our operations, supply chain, and business relations. Our ESG charters, consistent actions, and annual ESG reporting framework stand as proof of our commitment to advance corporate sustainability.

CCV's Business Code of Conduct has been reviewed in line with the company's CSRD material topics, identified through the Double Materiality Assessment. The Business Code of Conduct is further informed by the international voluntary frameworks and principles of the OECD Due Diligence Guidance for Responsible Business Conduct and the ILO Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy.

Beyond our own operations, we believe in the responsibility of extending our sustainability vision into the supply chain practices and the wider business relations. CCV's Business Code of Conduct has been developed to convey CCV's vision for sustainability, ethics, and integrity in the supply chain, focused on four core areas.

These are the same areas on which CCV pursues action internally, aimed at consistently improving and tracking the Group's sustainability performance. Our annual ESG report and Ecovadis disclosure support our vision for transparency in sustainability — a good practice that we believe should be promoted across the industry.

We encourage our Business Partners to join the international community of companies that adhere to the vision and commitment to sustainability and business integrity, by aligning their business and values with the principles and themes outlined in CCV's Business Code of Conduct.

The principles informed by CCV's Business Code of Conduct are grouped under four focus areas for sustainability and business ethics:

1. Environmental sustainability (Art. 1–5)
2. Human rights and labour conditions of employees (Art. 6–22)
3. Governance and business integrity (Art. 23–28)
4. Procurement practices (Art. 29–30)

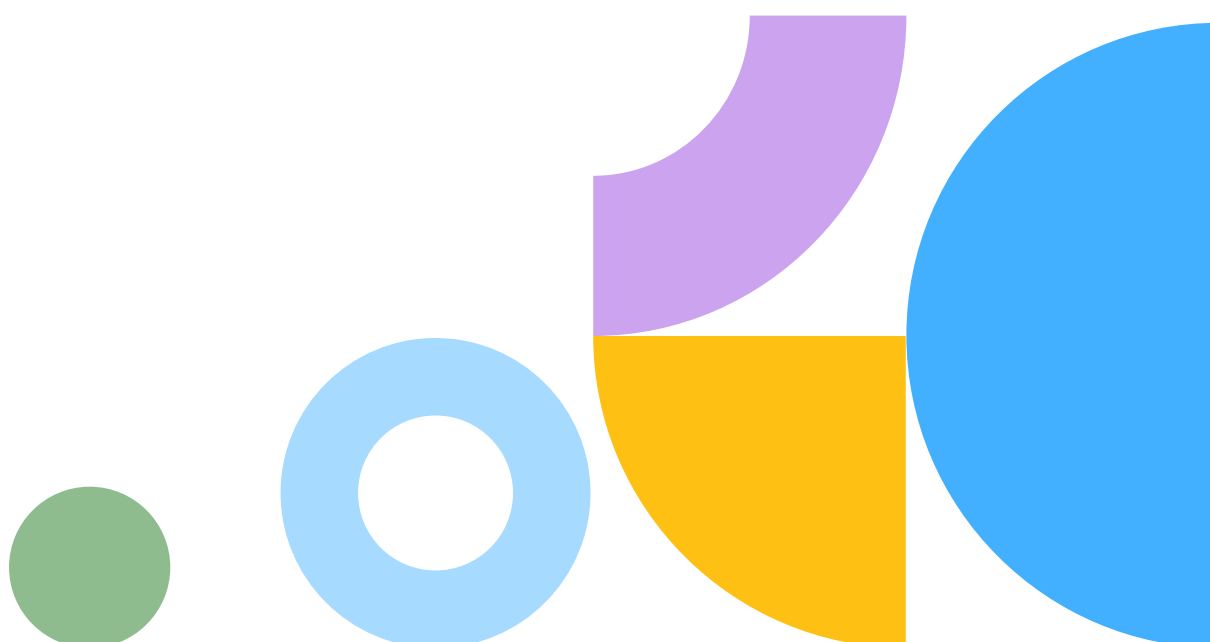
The latest revision on the Business Code of Conduct has been approved by CCV Board of Directors on the 4th of September, 2025.



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1. Environmental sustainability



We encourage our business partners to recognise and act upon their environmental responsibility. To achieve international ambitions, our visions must align in assessing impacts, setting targets, taking action, and ensuring transparent reporting regarding environmental footprints — both operational and across products, services, and supply chains.

Art. 1: Climate change action

With targets adopted to reduce greenhouse gas emissions, companies should ensure their business operations take a responsible approach to assessing, reducing, and disclosing their GHG emissions.

Art. 2: Energy

Companies should align with and support a rapid and effective transition to renewable energy, limiting fossil fuel use in both operations and logistics throughout the supply chain. Energy-efficient systems should be implemented to ensure responsible energy use.

Art. 3: Natural resource use

All companies should aspire to adopt a responsible approach to the sourcing, use, and demand of natural resources, thereby limiting raw materials intake. Investing in innovation through circular design from the manufacturing stage throughout product life cycle use should be adopted to extend product life cycle and limit natural resource use. These actions should support a vision for action to conserve the limited natural resources and the ecosystems affected by it.

Art. 4: Environmental information

Companies should strive to provide accurate information on the environmental footprint, including materials use and GHG emissions, helping clients understand the environmental impact of their products and services.

Art. 5: Waste management

Actions should be taken to minimise and responsibly manage waste resulting from company operations, especially hazardous waste and electronic waste. Companies must ensure that no pollution of land, air, or water occurs as a result of poor waste management.



2. Human rights and labour conditions of employees



Every company has the responsibility to ensure that human and labour rights are upheld within their operations, and that proper working conditions are provided. Respect for human dignity and the individual should be paramount in all employer-employee relations. We believe companies should act on their responsibilities as employers by focusing on the following topics.

Art. 6: Secure employment

Employers should strive to ensure secure employment by providing clear and transparent employment terms, including the conditions for termination of employment.

Art. 7: Working times

Employees should be engaged in work according to national laws. Systems should be in place to monitor working hours, leave entitlements, and the conditions under which atypical and overtime work occurs.

Art. 8: Adequate wages

All employees should be treated and remunerated fairly, based on the value of their work and in compliance with statutory wage laws.

Art. 9: Social dialogue

Employers should engage in social dialogue, establishing clear structures that support open communication and constructive collaboration between management and employees.

Art. 10: Freedom of association

Employers must respect employees' rights to freely assemble and associate within structures supported by statutory law, ensuring that employees' rights can be effectively represented.

Art. 11: Collective bargaining

Employers should respect the right to collective bargaining as established by statutory laws and ensure its lawful implementation.

Art. 12: Work-life balance

Work-life balance should be respected as essential for employees' wellbeing. Leave entitlements and holidays must be granted in accordance with national law and managed in connection with working hours.

Art. 13: Health and safety

Employers are responsible for implementing occupational health and safety measures in compliance with the law. This includes providing appropriate systems, tools, and training.

Art. 14: Water and sanitation

Employees must have access to clean drinking water and sanitation facilities at the workplace and during work hours.

Art. 15: Employee privacy

Employee privacy must be treated with the utmost care. All personal data should be used only for the purposes agreed upon in the employment contract.

Art. 16: Gender equity and equal pay for work of equal value

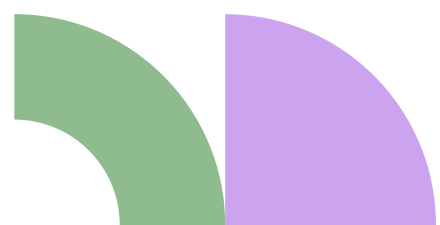
Companies should actively work toward gender equity by identifying salary gaps and eliminating barriers to equal pay for equal work, free from any form of discrimination.

Art. 17: Training and skills development

Employers should invest in the professional development of their workforce, providing access to training, infrastructure, and opportunities to build career-relevant skills.

Art. 18: Employment and inclusion of persons with disabilities

Companies should promote inclusive hiring and ensure appropriate working conditions for persons with disabilities, enabling equitable participation in the workplace.



Art. 19: Measures against violence and harassment in the workplace

All forms of violence and harassment must be prevented. Employers should implement systems to mitigate risks, provide reporting channels, and act decisively in any identified cases.

Art. 20: Diversity

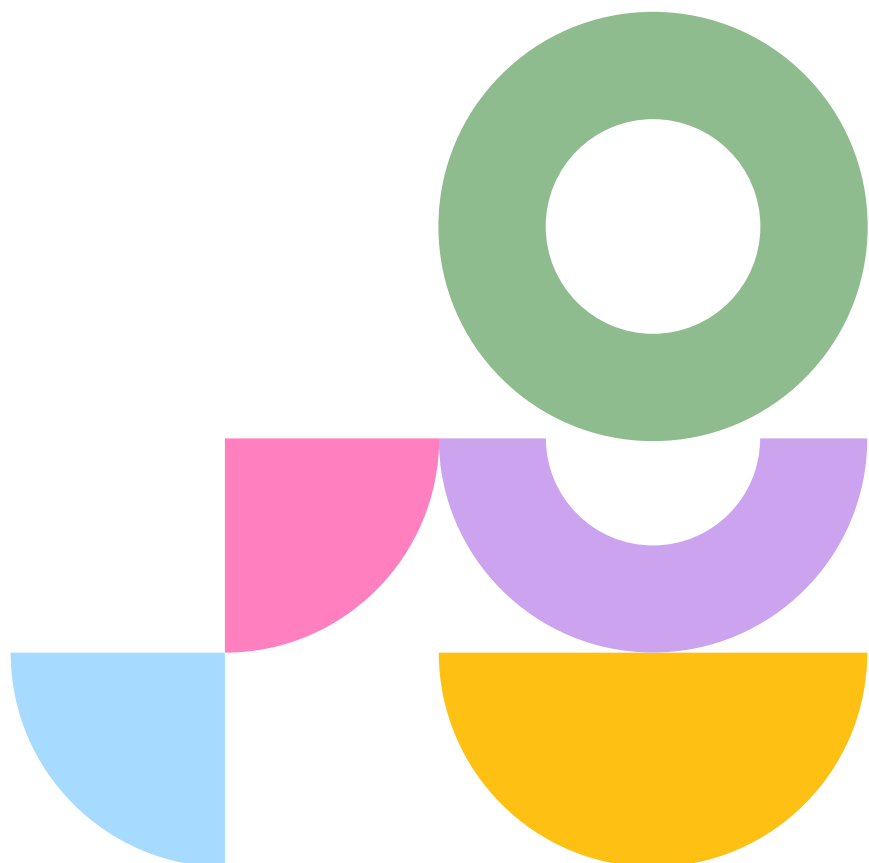
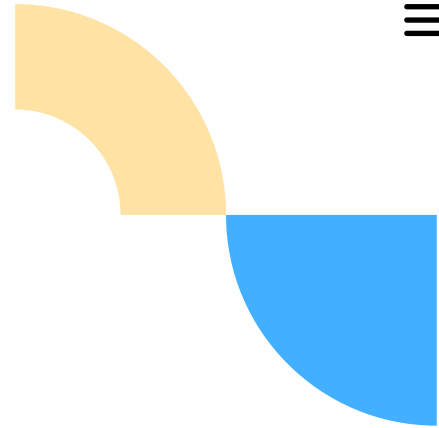
Diversity should be embedded in company values, ensuring non-discrimination on any grounds. All employees must feel included and have equal access to services in a safe, supportive work environment.

Art. 21: The effective abolition of child labour

Companies must take strict and proactive measures to identify and eliminate any occurrence of child labour. In cases of legal underage employment, this must be properly documented and carried out in compliance with all legal requirements.

Art. 22: Abolition of forced labour and modern slavery

Companies must work actively to prevent and eliminate forced labour and all forms of modern slavery. Any such cases must be identified and addressed immediately.



3. Governance and business integrity



We expect all our business partners to conduct their business in accordance with the highest standards of ethics and integrity. Most of the principles outlined below are legal obligations, which CCV complies with and expects its business partners to follow.

Art. 23: Anti-corruption, anti-bribery, and other unlawful business behaviour

Unlawful and unethical business practices, including corruption, fraud, and bribery, must be prevented. Companies should have effective policies, procedures, and systems in place to manage and reduce such risks. Financial reporting must follow strict guidelines to ensure traceability, transparency, and accountability. Structures for reporting misconduct should be implemented, and timely action should be taken to address any violations. Employees must receive training on how to recognise and prevent unlawful corporate behaviour.

Art. 24: Conflicts of interest and business gifts

Companies must define and communicate clear rules regarding conflicts of interest and the giving or receiving of business gifts. Any incidents of non-compliance must be reported and addressed immediately.

Art. 25: Fair competition and market practices

Companies must comply with antitrust and competition laws, refraining from unfair practices and ensuring fair market competition in all business activities.

Art. 26: Action against terrorism, including financing and business relations with terrorist groups

CCV expects its business partners to implement strict measures to prevent financing of terrorist activities and other business relations in connection with terrorist groups. This includes establishing internal controls and conducting employee training to reduce the risk of any form of business engagement with terrorist groups.

Art. 27: Data protection and information security

Business partners must comply with national and international data privacy laws. Information and cybersecurity should be strengthened continuously through procedures, policies, and employee training.

Art. 28: Ethical marketing and trustworthiness

Marketing and promotional activities must be truthful and ethical. Companies should ensure that all customers and end-users receive accurate and reliable information.



4. Procurement practices



At CCV, we believe our responsibility extends beyond internal operations to include the practices and relationships we foster throughout our supply chain. Procurement must be guided by a commitment to sustainability and ethics.

Art. 29: Sustainability and ethics principles in procurement

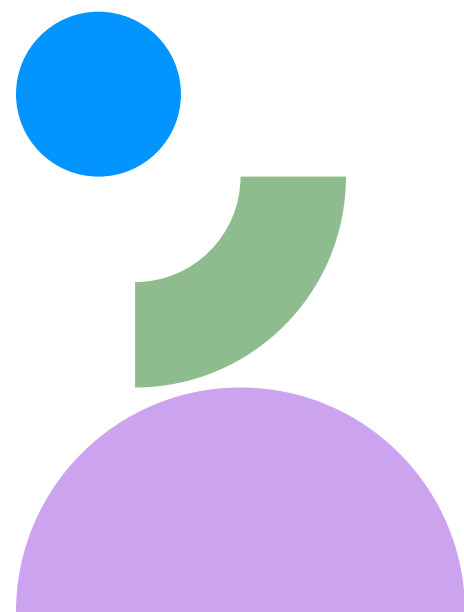
We encourage our business partners to take an active role in advancing Environmental sustainability, Human rights and Labour and ethical Governance principles within their procurement relations. This may include the adoption of supplier codes of conduct, adoption of contractual clauses, supplier surveys, and/or ESG risk assessments. Business partners may also be informed in their procurement practices by international frameworks, such as the OECD Due Diligence Guidance for Responsible Business Conduct.

Art. 30: Compliance with trade regulations on conflict minerals and international sanctions

CCV expects its business partners to comply with all relevant trade regulations, including tax, customs, import and export laws, and international sanctions. In particular, supply chain management must align with Regulation (EU) 2017/821 of the European Parliament and Council of 17 May 2017, concerning obligations for importers of tin, tantalum, tungsten, gold, and other metals sourced from conflict-affected and high-risk areas. Partners are referred to the EU Sanctions Map for up-to-date information: <https://www.sanctionsmap.eu/#/main>

5. Grievance Mechanisms

Anyone who observes or is affected by any action that violates this Code is encouraged to report it. Internally, CCV offers multiple reporting and grievance channels, all guided by our misconduct procedure. For anonymous reporting, stakeholders may use the Speak Up whistleblower system. More information is available on our corporate website: <https://www.ccv.eu/en/about-ccv/our-story/corporate-social-responsibility>



Stakeholder acknowledgement



I, the undersigned (first name and last name): _____

Position/title: _____

On behalf of the company (registered name and address): _____

Hereby acknowledge and recognise the principles outlined in the CCV Business Code of Conduct.

As a business partner to CCV, we respect and adopt the principles stated in the CCV Business Code of Conduct.

Signature _____

Date (dd/mm/yyyy) _____

Place _____

Note!

This Business Code of Conduct must be signed by a duly authorised representative of the company and returned to your counterpart at CCV.





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