



# Suppliers Code of Conduct

CCV Group B.V.



# 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 suppliers 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 suppliers to adhere and comply with the principles of ethical corporate behaviour informed by CCV's Suppliers Code of Conduct.

The Suppliers 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 Suppliers 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, 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 suppliers to join the community of companies who adhere to internationally recognised disclosure standards and who promote transparency and accountability in the supply chain.

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

1. Social Responsibility (Art. 1-9)
2. Governance and Business Ethics (Art. 10-20)
3. Environment (Art. 20-23)
4. Value Chain and Due Diligence (Art. 24-25)
5. Corporate Citizenship (Art. 26)

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# A. Social responsibility

The section refers to the social responsibility and the impact a company is considered to have on people. In this Suppliers Code of Conduct, we refer to human rights and labour, diversity and inclusion and health , among others. We expect our suppliers 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

Suppliers 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 suppliers 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

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

## Art. 3. Working times, remuneration and leave

Suppliers 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 supplier 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.

Suppliers will transparently inform on terms of employment, benefits and responsibilities, salary grids, and parameters for promotion for employees at all levels. Suppliers 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**

Suppliers 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.

Suppliers 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, suppliers will support the employee in transitioning back to work, as informed by the applicable employee handbook/labour provisions.

**Art. 5. Right to organise and collective bargaining**

Suppliers 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. Diversity, inclusion and anti-discrimination**

Suppliers 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 and 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, supplier are expected to ensure methods and tools to identify, mitigate and react to cases any harassment and abuse, and to support diversity and inclusion for all employees.

**Art. 7. Equality of opportunities and treatment**

Suppliers will ensure the provision of human and labour rights, and equal grounds for hiring, remuneration, training, career advancement and employment termination. Suppliers will ensure that all employees are assisted in fulfilling their work with integrity, providing the necessary resources required by the employees' needs. Suppliers will also work to identify and integrate employee groups prone to vulnerability and discrimination (e.g. gender 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. Occupational health and safety**

Suppliers will ensure that the workspace corresponds from an occupational health and safety standpoint. This includes facilities, equipment and training that would allow employees to perform their work accordingly. 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. Suppliers will ensure continuous monitoring and improvements to meet the national and international standards for occupational health and safety.



# 2. Governance and business ethics

The section refers to a company's ethical business behaviour regarding its governance systems and stakeholder relations. Suppliers 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

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

### Art. 10. Bribery, extortion and gifts

Suppliers 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. Suppliers are not to engage in any commercial activity that involves benefiting and sharing unlawful profits and will not give/receive gifts to and from suppliers without control systems.

### Art. 11. Money laundering and financing of terrorist activities

Suppliers 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. Suppliers 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**

Suppliers 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**

Suppliers 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 suppliers 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**

Suppliers 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. Suppliers are to meet and comply with the legal requirements for product information disclosure concerning health, safety, and warnings and increasingly, environmental impact.

#### **Art. 15. Whistle blow**

Suppliers are to provide whistle blow channels that allow internal and external stakeholder 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**

Suppliers are to comply with national and international legislation for financial and non-financial disclosure. This includes a practice of transparent reporting of company governance material topics, labour and human rights and environmental impacts. Reporting should address internal and external audiences, ensuring corporate accountability and responsible business governance. This practice also extends to the transparent communication of human rights and labour practices, social policies, health and safety concerns to employees.

#### **Art. 17. Conflict of interests**

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

#### **Art. 18. Insider trading**

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

#### **Art. 19. Provision of site healthy, security and safety**

Suppliers 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 supplier's sites. This includes exposure to security threats such as terrorism, crime and pandemics. Suppliers should comply to respect CCV's or CCV's clients' health and safety procedures, whenever working on their sites. We require Suppliers 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 value chain. Suppliers are to assess, understand and limit their environmental footprint regarding natural resources use, Greenhouse Gas emissions and waste. We encourage our suppliers 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 supply chain. Suppliers 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 resources and environment

Suppliers 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 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. Suppliers 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

Suppliers are to assess the waste generated from their operations and value chain. This understanding should lead to improved management systems to reduce the environmental footprint of waste. Overall, suppliers are to uphold responsible standards for their waste management system, including special provisions for electronic waste, as well as biological, chemical or physical hazardous and toxic waste. Suppliers 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 suppliers 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, suppliers 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

Suppliers are expected to manage their supply chains on a risk-basis, safeguarding the financial integrity and quality of the company and their outputs. Suppliers 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. We encourage our suppliers to adhere to the EU sanctions map (<https://www.sanctionsmap.eu/#/main>), which CCV is also following.

### Art. 24. Due diligence

Suppliers 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. Suppliers should not be knowingly complicit to any deviations from these standards. Suppliers 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 supplier 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 suppliers 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

Suppliers 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, suppliers 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 Suppliers Code of Conduct is adopted and integrated into CCV Group B.V. procedures concerning its suppliers. Suppliers whom have been informed by CCV, are requested to acknowledge and comply to the principles enlisted in the present Suppliers Code of Conduct.

At CCV, we are committed to embedding and streamlining the principles listed in the Suppliers Code of Conduct in all procedures involving our suppliers. We monitor the progress on suppliers' 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 contract or bid process, if the supplier does not acknowledge and complies to respect CCV's Supplier Code of Conduct or to provide additional information in material areas of risk, as identified in the Supplier Code of Conduct.



# 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 Suppliers Code of Conduct. As a supplier, we commit to respecting and complying to the principles stated by CCV Suppliers Code of Conduct.

Signature \_\_\_\_\_

Date (dd/mm/yyyy) \_\_\_\_\_

Place \_\_\_\_\_

**Note!**  
The Suppliers 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](http://www.ccv.eu)