

SUPPLIER CODE OF CONDUCT

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1. Introduction

As a global company, Sofico is committed to the highest standards of ethical conduct and professional behaviour and is committed to upholding and respecting human rights. The Supplier Code of Conduct is based on and supports the principles of the UN Guiding Principles on Business and Human Rights (United Nations Global Compact).

We are determined to work with suppliers who respect and are engaged with Sofico's principles, set out in this Supplier Code of Conduct. This Supplier Code of Conduct contains the minimum standards of behaviour expected of all suppliers engaged by Sofico.

This Supplier Code of Conduct is binding for all suppliers of Sofico (and its subsidiaries), together 'Sofico'.

Sub-suppliers commissioned by the suppliers in connection with the business relationship with Sofico, regardless of the type of collaboration, are also bound by this Supplier Code of Conduct. Sofico expects its suppliers to take all reasonable measures to ensure that their own (sub-)suppliers also meet the requirements set out in this Supplier Code of Conduct.

This Supplier Code of Conduct is an integral part of the entire business relationship between the supplier and Sofico.

A supplier's contract with Sofico may contain provisions addressing some of these same issues. Nothing in this Supplier Code of Conduct is meant to supersede more stringent provisions in a specific contract with a supplier.

2. General Principles

2.1. Legal Compliance

As a supplier of Sofico, you commit to complying with all relevant applicable legislation, legal provisions and, at a minimum, the principles set out in this Supplier Code of Conduct.

You also ensure that your employees as well as your own suppliers know and adhere to the principles listed in this Supplier Code of Conduct.

Every supplier is expected to meet these standards in connection with its business activities. Suppliers should establish and enforce policies which comply and align with the expectations of this Supplier Code of Conduct.

2.2. The Principles of the Supplier Code of Conduct

The Supplier Code of Conduct sets out the general principles in the following domains:

- Ethics and Business Integrity
- Labor and Human Rights
- Environment

2.3. Monitoring and Training

As a supplier you shall have suitable compliance and control mechanisms in place in order to verify compliance with the principles set out in the Supplier Code of Conduct.

You shall also provide regular training related to the principles set out in the Supplier Code of Conduct, to ensure that your staff is sufficiently trained on topics such as Ethics and Business Integrity, Health and Safety, Environmental topics and Human Rights.

3. Ethics and Business Integrity

3.1. Confidentiality and Privacy

Confidentiality

Suppliers are required to take all necessary and reasonable measures to protect and secure Sofico's and Sofico's customers' confidential information, know-how, data, and intellectual property.

Any information provided by Sofico to a supplier can and must only be used by the supplier for the agreed or intended purpose. Unless otherwise agreed or provided for by law, such confidential information shall only be shared with third parties if, and to the extent that it is authorized based on the existing contract, and only if this is essential for the proper execution the services, to be provided by a supplier.

Privacy

Suppliers must take all appropriate measures to comply with all applicable laws and regulations regarding privacy and personal data protection, such as but not limited to EU General Data Protection Regulation. Suppliers must appropriately manage and protect Sofico's or Sofico's customers' data against unauthorized access, disclosure, modification or destruction.

3.2. Conflicts of Interest

A supplier shall not allow conflicts of interest, or inappropriate influence of others to override its professional judgments and responsibilities.

A Supplier must make every effort to prevent the occurrence of situations that create an actual, perceived or potential conflict of interest within the scope of the relationship with Sofico.

3.3. Corruption and Anti-Bribery

Suppliers of Sofico shall comply with all legislation and regulation with respect to bribery and corruption, such as but not limited to the UK Bribery Act.

Sofico has and expects its suppliers to have a zero tolerance toward corruption.

Sofico requires its suppliers to:

- always act with integrity;
- never participate in improper practices, such as corruption and bribery;
- not offer or accept anything of any value, potentially to be considered as influencing business decisions.

3.4. Fair competition

Sofico is committed to conducting business in a manner that promotes fair competition and adheres to all relevant antitrust and competition laws. Sofico is dedicated to conducting its business in a transparent and ethical manner, and expects suppliers to do the same.

3.5. Money Laundering

Sofico is firmly opposed to all forms of money laundering and will comply with all applicable anti-money laundering laws, and take steps to prevent our financial transactions from being used by others to launder money.

Before entering into a customer, partner or supplier agreement, Sofico shall ensure that the third party is legally established and conducting a law-abiding business.

Sofico's suppliers shall also not engage in or assist any third party with any money laundering or other financial crime activities.

4. Labor Standards and Human Rights

Sofico expects a supplier to exhibit social responsibility in its conduct, according to the applicable legislation and the principles, set out in this Supplier Code of Conduct.

Sofico expects each and every supplier to acknowledge the UN Guiding Principles on Business and Human Rights (United Nations Global Compact).

A supplier shall respect and support international human rights standards and shall not be involved in any breaches of human rights.

4.1. Non-Discrimination

A supplier shall take appropriate steps and measures against any type of discrimination and/or unequal or unfair treatment. Every person shall be treated with respect, and no one shall be discriminated against due to their gender, race, disability, origin, religion, age, political opinion, sexual identity, or other categories, protected by law(s).

4.2. Child Labour

Suppliers shall not exploit or tolerate child labour and shall not employ any workers under the age of 15 or the minimum legal working age, whichever is greater.

4.3. Forced Labour and Modern Slavery

Suppliers must warrant that there are no forced labour or human trafficking practices and that employees are free to leave their job according to the applicable legislation. Suppliers must respect the principle of workers freedom of movement.

All forms of forced labour, (modern) slavery or trafficking, as well as withholding ID's, passports or work permits shall be strictly prohibited.

A supplier shall ensure that all terms of employment are voluntary.

4.4. Freedom of Association

Suppliers shall allow their employees to associate and shall allow ways of collective negotiation, according to the applicable local legislation. Suppliers shall not hinder the rights of workers to legally organize.

4.5. Harassment

Supplier shall foster a culture and workplace that does not tolerate harassment, including sexual harassment, threats of harassment, or retaliation for reporting harassment.

4.6. Working Conditions

Suppliers must respect local and international labour regulations and shall take the necessary measures with regards to:

- working hours and wages;
- health and safety of employees in the workplace;
- the prevention of verbal, sexual or physical violence, assault or harassment of any kind.

5. Environment

Sofico expects its suppliers to :

- conduct their activities with respect for the environment;
- take initiatives to reduce the ecological footprint;
- have a program in place to reduce the environmental impact of the services they provide (e.g. the reduction of emissions);
- make efforts to minimize the use of energy and water;
- share data related to environmental impact if requested by Sofico;
- improve the environmental performance by identifying and managing environmental risk and impacts throughout their supply chain.

6. Reporting

Suppliers can report potential or suspected violations of this Supplier Code of Conduct or applicable legislation or regulation via the following platform / whistleblowing channel: [Sofico Whistleblowing Channel](#).

The recipients of the alert ensure that all necessary investigations are conducted with the greatest possible level of confidentiality compatible with the requirements of the enquiry.

The possibility of raising an alert anonymously is a principle guaranteed by Sofico, which provides the means necessary to allow this form of communication. Nonetheless, knowing the identity of the whistleblower (while keeping it confidential) may make it easier to deploy all the necessary investigative measures.

7. Compliance Monitoring by Sofico

Sofico retains the right to carry out audit and monitoring activities related to the principles set out in this Supplier Code of Conduct.

This may include the following activities:

- self-assessment questionnaires, to be completed by Sofico's suppliers;
- the request to receive reports related to the topics set out in this Supplier Code of Conduct;
- on-site audits.

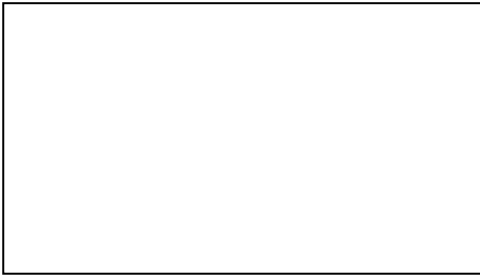
Non-compliance with the Supplier Code of Conduct may result in corrective actions, which may include but are not limited to suspension or termination of the existing business relationship between Sofico and the supplier.

8. Changes

Sofico reserves the right to modify and update the Supplier Code of Conduct. In case Sofico makes material changes to the Supplier Code of Conduct, Sofico will inform the supplier of the modifications made.

The most recent version of the Supplier Code of Conduct is available on Sofico's website.

9. Acceptance



Date: -----

Place: -----

Name: -----

By signing this document, you confirm that you shall comply with the principles, set out in this Supplier Code of Conduct.