

Strukton CSR Code of Conduct for suppliers

Strukton expects its suppliers, contractors and subcontractors (hereinafter referred to as the "Supplier") to comply with the principles of corporate social responsibility. Strukton expects the Supplier to assume social responsibility in areas that are within its control for:

- the environment and the community in which the Supplier is active;
- the employees of both Strukton and the Supplier;
- Strukton's client and the Supplier's chain;
- the environment and society in general.

In this Strukton CSR Code of Conduct, Strukton specifies the corporate social responsibility that is expected of the Supplier as regards People, Planet and Profit.

People

The Supplier respects the <u>Universal Declaration of Human Rights</u> of the United Nations and acknowledges its responsibility towards the employees and the communities in which the Supplier is active.

The Supplier respects the universal standards concerning labour that have been elaborated in a series of <u>conventions</u> of the UN's international labour agency and the International Labour Organization (ILO).

The Supplier offers its employees terms of employment that comply at least with all local and national legislation and regulations in the areas of reimbursement – both financial and otherwise – and working hours, including legal requirements relating to minimum wage, payment for overtime, sick leave, compensation per product and other compensation schemes.

The Supplier guarantees that all personnel employed by the Supplier and/or third parties engaged by it work no more than the maximum number of work days and working hours set out in local legislation. Employees are not allowed to work more than 60 hours per week, including overtime. Employees must have at least one day off every seven calendar days.

Deviation from these working times is possible in case of special employment contracts including broader working times against reasonable financial compensation, provided that the agreements comply with national and/or international legislation. However, it must be ensured that the average of 60 hours per week for a period of 12 weeks is not exceeded.

The Supplier offers its employees a safe and healthy work environment and strives to continuously improve safety. The Supplier ensures that employees have the correct personal protective equipment at their disposal and that they complete the requisite safety training.

When performing its activities, the Supplier complies with all general sectoral safety regulations and Occupational Health & Safety regulations, as well as all rules and regulations applied by Strukton at the local level. The Supplier has obtained all required certifications with respect to safety when performing its activities The Supplier's safety policy is of a demonstrably preventative nature and strives for zero accidents.



The Supplier does not tolerate any form of discrimination or intimidation by one of its employees towards or directed against one of its employees.

The Supplier offers equal opportunities to employees without regard to race, colour, gender, nationality, religion, ethnic background or other distinguishing characteristics. The efforts related to equal opportunity as regards work comprises the recruitment or engagement of staff, training, promotions, termination of contracts, pensions and all other conditions and stipulations included in employees' terms of employment.

The Supplier acknowledges employees' right to associate within trade unions and/or works councils in accordance with relevant national legislation and principles.

The Supplier acknowledges employees' right to engage in collective bargaining in relation to their terms of employment.

The Supplier does not employ any individuals under the legal working age as established in the relevant national legislation. The Supplier does not employ children under the age of 15.

If child labour is discovered in the Supplier's chain, the Supplier is required to implement appropriate measures to end this situation and to implement measures aimed at improving the child's situation and wellbeing and ensuring that the child receives proper education. It is the Supplier's responsibility to report child labour to the local authorities and Strukton.

The Supplier does not make use of forced labour, slave labour, involuntary penal labour and/or other forms of involuntary labour in either its own business operations or any part of the Supplier's chain

Planet

The Supplier is aware of the environmental implications of its business operations and is constantly on the lookout for new ways to minimise the impact of its business operations, the production and the products, on the environment. The Supplier holds all the necessary local permits and also demonstrably pursues an environmental policy as laid down in the form of ISO14001, EMAS, or an equivalent environmental management system.

When performing its activities for Strukton, the Supplier only uses sustainable certified wood (FSC, PEFC or a demonstrably equivalent sustainability certificate).

The Supplier strives to prevent waste as much as possible or to recycle it. If this is not possible, waste is removed in an environmentally-friendly manner and in accordance with the applicable legislation or regulations. The Supplier ensures that the waste is processed in accordance with the statutory requirements throughout the chain (from the source to the final destination). The Supplier demonstrates this at Strukton's request.

At Strukton's first request, the Supplier submits a list of measures it has implemented that lead to reduction at the work place of:

- energy consumption
- water consumption
- · harmful emissions, such as volatile organic substances
- CO2 emissions.



Profit

The Supplier is obliged to comply with all relevant legislation and regulations in the area of the fight against corruption and bribery. The Supplier must not be involved in corruption, bribery, extortion and embezzlement of any kind whatsoever or tolerate these activities as also described in the <u>Strukton Code of Conduct for Ethical Business</u>.

Miscellaneous

The Supplier subscribes to the guidelines for corporate social responsibility developed by the ILO and the Organisation for Economic Cooperation and Development (OECD). These guidelines can be found at www.ilo.org and www.oecd.org

At Strukton's first request, the Supplier will be required to provide all relevant information within the context of this Strukton CSR Code of Conduct within a reasonable term.

Suppliers who are unable to comply or who are unable to comply fully with this Strukton CSR Code of Conduct will inform Strukton in a timely manner of the ways in which it deviates from the Strukton CSR Code of Conduct. The Supplier is required to indicate in that connection how and when it will be able to comply with the Strukton CSR Code of Conduct.

The Supplier informs its employees of the content of and compliance with the Strukton CSR Code of Conduct. The Strukton CSR Code of Conduct must be available for inspection by the employees at all times.

Strukton has the right at all times to perform an audit at the Supplier or at the third parties engaged by the Supplier in order to check compliance with the Strukton CSR Code of Conduct. The Supplier will cooperate in such an audit. Strukton may have this audit performed by a third party.

The Supplier represents the third parties engaged by it as if it concerns its own acts or omissions. The Supplier guarantees that the third parties engaged by it comply with the Strukton CSR Code of Conduct for suppliers. The Supplier guarantees that Strukton is also able to exercise its powers on the basis thereof towards the third parties engaged by it.

Strukton may reconsider its relationship with the Supplier if the Supplier fails to comply with the Strukton CSR Code of Conduct.

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