



 **Strukton**
All Right
CSR Principles of
Conduct for Suppliers

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Strukton's Principles of Conduct for Suppliers

This document sets out the Principles of Conduct that apply to Strukton's suppliers. Where this document refers to suppliers, it means suppliers, contractors, and subcontractors.

Strukton prefers to enter into lasting relationships with suppliers. Such a lasting relationship serves as a basis for investing together in safe, socially responsible solutions. For this reason, we believe it's important that suppliers approach their work with a genuine commitment to ethical and socially responsible practices, and that they accept social responsibility within their sphere of influence for:

- Those around them and the community in which they operate
- The employees of both Strukton and the suppliers themselves
- Strukton's clients and the supplier's chain
- The environment and society in general

This Code of Conduct specifies the social responsibility we require from suppliers. The basis for this Code of Conduct for Suppliers is laid down in the Strukton's Code of Conduct on Doing Business with Integrity and its CSR Policy Statement.

Both documents and this Code of Conduct for Suppliers can be found on the Strukton website (<https://strukton.nl>)



We expect our suppliers and partners to at least meet our standards of ethics and sustainability. In this respect, we assume the following principles:

1. Suppliers do business with integrity in an ethically responsible manner

By embracing these ethical principles, we strive to create a business environment rooted in integrity, honesty, and respect for all stakeholders. We expect the following from our suppliers:

a. Honesty and integrity

Suppliers act honestly and with integrity in all their business activities. This includes refraining from misleading practices and making false statements, and providing accurate and complete information.

b. Conflicts of Interest

Suppliers proactively identify conflicts of interest, and communicate openly about potential conflicts of interest that could jeopardize their ability to act fairly and impartially.

c. Gifts and Favours

Suppliers adopt policies that regulate gifts, favours, and

hospitality to ensure that they are not used to exert undue influence or attempt to obtain inappropriate benefits. Suppliers also have policies in place that prohibit engaging in corruption, bribery, or unethical conduct in any circumstances.

2. Suppliers respect and protect human rights

Strukton expects its suppliers to respect the fundamental rights listed in this chapter, and to assume responsibility for these rights throughout the entire value chain. These fundamental rights are based on:

- the United Nations' Universal Declaration of Human Rights by the (UN)
- Where applicable: The OECD Guidelines for Multinational Enterprises
- Universal labour standards that have been elaborated in a series of conventions of the United Nations International Labour Organization and the International Labour Organization (ILO). More specifically, this means:

a. The working environment is safe and healthy: Suppliers

provide their employees with a safe and healthy environment in which to work, and strive to improve safety continuously. They make sure that employees use appropriate personal protective equipment and receive appropriate safety training. In the context of their activities, suppliers adhere to the general industry safety regulations and occupational health and safety rules, as well as the regulations and rules that Strukton applies locally. The suppliers have obtained the qualifications required to work safely. The suppliers have a demonstrable preventive safety policy in place, and continuously work on improving the safety culture, in which people speak to each other about safety and report unhealthy or hazardous situations.

b. Non-discrimination and diversity: The suppliers enforce a policy of non-discrimination and promote diversity in their workforce. Discrimination based on race, gender, religion, sexual orientation, age, disability, or other protected characteristics is not tolerated. The scope of promoting equal employment opportunities covers the recruitment and hiring of personnel, as well as training, promotion, contract termination, retirement, and all other terms and conditions of employment.

c. Freedom of association and collective bargaining: Suppliers respect and support the right of employees to freedom of

association and to participate in collective bargaining.

d. Child labour and forced labour: Suppliers are absolutely prohibited from using child labour or forced labour. All employees and employees hired by suppliers must be of legal age, and not be forced to work.

If child labour is detected in the supplier's chain, the supplier takes the necessary measures to prevent this, as well as measures to improve the situation and guarantee the well-being of the child and the child's education. Suppliers are responsible for reporting child labour to the local authorities and Strukton.

e. Fair employment conditions: Suppliers offer their employees employment conditions that at least comply with all local and other laws and regulations in the field of salaries, allowances, and working hours, including the legal requirements regarding the minimum wage, overtime compensation, sick leave, piece-rate, and other allowances.

3. Suppliers use environmentally conscious production methods, and strive to minimize their ecological footprint and impact on biodiversity

Suppliers are aware of the environmental implications of their business operations, and continuously search for ways to minimize the impact of their business operations, production, and products on the environment and biodiversity. More specifically, we expect the following:

- a. Sustainable materials: Suppliers use sustainable materials and raw materials in their production processes wherever possible. Reducing the use of non-renewable resources and promoting recycling is prioritized.
- b. Energy efficiency: Suppliers are encouraged to implement measures in their production processes that reduce energy consumption. This could include using electrical equipment and materials, renewable energy sources, and low-energy tools and technologies.
- c. Minimization of waste and residuals: Suppliers must implement measures to minimize waste and residuals, including reducing, reusing, and recycling waste, and delivering packaging

with either no packaging or circular packaging. Circular production methods are encouraged. If this is not feasible, the waste must be collected and disposed of separately in an environmentally friendly manner in accordance with laws and regulations. Suppliers ensure that waste is processed throughout the chain, from source to destination, in accordance with legal requirements. At Strukton's request, suppliers must demonstrate this.

- d. Biodiversity. To mitigate any negative impacts on biodiversity as a result of their activities, suppliers take the most effective possible measures. In the event of a negative impact, they take measures to restore biodiversity.
- e. Soil contamination. Suppliers take the most effective possible measures to combat soil contamination as a result of their activities. In the event of a negative impact, they take measures to minimize and restore the impact.
- f. Air pollution. Suppliers take the most effective possible measures to combat air pollution as a result of their activities, with particular attention to the **list of most common air pollutants drawn up by the EEA**. In the event of a negative impact, they take measures to reverse it.
- g. Water pollution. Suppliers take the most effective possible

measures to combat water pollution as a result of their activities. In the event of a negative impact, they take measures to minimize and reverse the impact.

- h. Handling hazardous substances If hazardous substances are used, imported, or distributed, suppliers act in accordance with the **REACH regulation**.
- i. Environmental management and certification: Suppliers possess the required local permits. In addition, and to the extent applicable to their business operations, they have adopted a demonstrable environmental policy, as established in ISO14001, EMAS, CO2 Performance Ladder or equivalent environmental management system.
- j. Transparency. On request, suppliers provide reports on their energy consumption and CO2 emissions, their measures to reduce energy consumption and CO2 emissions, and progress.

4. Suppliers act in accordance with laws and regulations

Suppliers never violate laws and regulations, and respect the rights and legitimate interests of third parties in the areas of privacy, confidentiality, and property. Suppliers act both in accordance with the letter and the spirit of laws and regulations

that regulate their activities. Strukton's purchasing conditions discuss this in detail, and prevail. Below are just some of the principles that we require our suppliers to enforce:

- a. Zero tolerance for corruption: Suppliers maintain a zero-tolerance policy towards corruption. This includes prohibiting offering, giving, receiving, or soliciting bribes, grease payments, or other forms of corruption.
- b. Transparency in business transactions: Suppliers are transparent in their business dealings, including providing complete and accurate information about prices, fees, and contract terms.
- c. Antitrust laws: Suppliers comply with all antitrust laws, and do not participate in cartel formation, price fixing, or other practices that undermine fair competition.
- d. Transparent quoting processes: Suppliers maintain transparent and fair quoting processes, providing equal opportunities to all potential suppliers without any form of discrimination.
- e. Privacy protection: Suppliers respect the privacy of personal data, and comply with all privacy laws. They take appropriate measures to protect personal data, and prevent unauthorized collection, use, or disclosure of data. If they process personal

data in the context of their work for Strukton, a processing agreement is drawn up.

- f. Confidentiality: Suppliers protect Strukton's confidential information, and only use it for the purpose for which it was provided. They only share this information with third parties if explicit consent is first given.
- g. Intellectual property: Suppliers respect the intellectual property rights of Strukton and third parties. They do not infringe copyrights, trademarks, or other intellectual property rights.
- h. Contractual obligations: Suppliers comply with all contractual obligations, including confidentiality clauses and ownership rights established in agreements with Strukton.

Compliance and control

These principles of conduct establish the requirements for Strukton's suppliers, underscoring the importance of integrity, fair competition, and acknowledgment of the rights of third parties. When selecting and evaluating suppliers, we take sustainability and social responsibility criteria into account.

We prioritize suppliers who are committed to corporate social responsibility, and actively work alongside them to achieve common goals.

Suppliers accept responsibility for the actions or omissions of third parties engaged by them as if these actions or omissions were their own. The suppliers guarantee that the third parties they engage adhere to Strukton's CSR Principles of Conduct for Suppliers.

Compliance and control

At Strukton's first request, suppliers must provide all relevant information in the context of these CSR Principles of Conduct for Suppliers within a reasonable period. Strukton is always entitled to audit suppliers and third parties engaged by suppliers to check compliance with Strukton's CSR Principles of Conduct for Suppliers. Suppliers must cooperate fully and immediately if such an audit is conducted. Strukton can have this audit carried out by an external auditor at the request of Strukton, the supplier, and/or a third party.

Strukton will reconsider its relationship with a supplier if this supplier does not comply with Strukton's CSR Principles of Conduct for Suppliers.