

# Supplier Code of Conduct Glaspoort B.V.

Glaspoort is committed to acting with integrity. We therefore expect our business partners to act in accordance to this Supplier Code of Conduct.

## 1. Legislation

Supplier will comply with all relevant international legislation and the national legislation of the countries in which they operate.

## 2. Human Rights

Supplier will support and respect the protection of internationally proclaimed human rights as defined by the International Labour Organization (ILO), will operate in the spirit of the Charter of the United Nations and ensure no involvement in human rights abuses. This includes, but is not limited to, the subjects of article 3.

## 3. Labour

Supplier will not indulge in acts of:

### 3.1 Discrimination

Supplier shall treat every employee equally and according to their abilities and performance. The same opportunities shall be granted regardless of race, ethnic origin, religion and belief, political opinion, national origin, disability, age, sexual orientation or gender. Supplier is encouraged to promote diversity and inclusion.

### 3.2 Child labour

We do not tolerate child labour or any form of exploitation of (young) employees. “Child labour” means the definition of ILO-IPEC and of Article 32 of the United Nations Convention on the Rights of the Child (UNCRC).

### 3.3 Forced labour

Supplier shall strictly prohibit any form of forced, bonded, compulsory labour, slavery or human trafficking. Employees shall be free to leave work or terminate their employment with reasonable notice and all employment shall be voluntary.

### 3.4 Working hours

Supplier shall ensure that working hours, including overtime comply with ILO standard. Suppliers shall grant their employees the right to paid vacation at least according to the ILO standard.

### 3.5 Adequate housing

If the Supplier arranges housing for migrant workers, such accommodation will comply to Dutch legislation and will be safe, hygienic, and offer sufficient space and privacy. If housing costs are charged to workers, these deductions must be fair, transparent, agreed upon in advance in writing, and must not reduce the workers’ wages below the applicable minimum wage after deductions, in accordance with Dutch law.

### 3.6 Disciplinary practices

Supplier shall treat all employees with respect and dignity. Physical or verbal abuse or other harassment and any threats or other forms of intimidation are prohibited.

### 3.7 Freedom of association & Right to Collective Bargaining

Supplier shall seek to implement internationally recognized standards as set by ILO Conventions. Supplier ensures that all employees and representatives including temporary (agency) workers shall have the right to form, join, and organize trade unions of their choice and to bargain collectively on their behalf with the

company and that their doing so will not result in any negative consequences to them, or retaliation, from the company.

### *3.8 Fair remuneration*

Supplier shall pay a fair and reasonable living wage to employees high enough to maintain a fair standard of living and which shall meet basic needs (ILO C131 – Minimum Wage Fixing Convention). Supplier shall not use deductions from wages as disciplinary measure. Supplier ensures equal remuneration for men and women for work of equal value. Supplier ensures the payment of wages in legal tender, at regular intervals.

### *3.9 Health and safety*

Supplier shall operate in accordance with international standards and local laws. Supplier shall provide its employees, contractors, partners or others who may be affected by supplier's activities with a safe and healthy working environment and ensure correct use of its products. Supplier is encouraged to implement a Health & Safety Management System based on international standards such as OHSAS 18001, ISO450001 or similar. Supplier shall prevent and minimize potential accidents.

## **4. Environment**

Glaspoort has ambitious goals on sustainability and stimulates suppliers to contribute to these goals. Supplier shall comply and shall enable Glaspoort to comply with all international, national, and local environmental laws and regulations that are applicable to their business operations. Supplier ensures all necessary permits, approvals and registrations. Supplier shall implement an Environmental Management System based on international standards such as ISO 14001 or EMAS. To reduce the environmental footprint, Supplier shall undertake continuous efforts to optimize their business, products and production processes in accordance with circular economy principles:

- > Design for environment and reduce the use of virgin raw materials;
- > Extend and optimize product use;
- > Increase re-use and recycling and minimize incineration and landfill of waste;
- > Energy efficiency.
- > Protect biodiversity and sensitive habitats.

### *4.1 Reduce / Design for Environment*

Supplier innovates in products and/or services that offer environmental and social benefits by:

- > Reducing the use of (virgin) raw materials and resources;
- > Using non-virgin/renewable content where possible;
- > Avoiding use of Critical Raw Materials (CRM) as defined by the European Union as much as possible;
- > Designing for disassembly and repair to facilitate re-use and recycling;
- > Using materials that can be easily recycled.

### *4.2 Extend and optimize product use*

Supplier shall design products and offer services that enhance longevity of product life cycles and efficient use of resources.

### *4.3 Increase re-use and recycling and minimize waste*

Supplier shall reduce and treat the waste produced by all activities to reduce their environmental footprint. Supplier shall identify, monitor and treat liquid waste and solid waste and air pollutants generated from operations, industrial processes and sanitation facilities before discharge or disposal. Supplier and its subcontractors will support Glaspoort in reaching its objectives for reuse and recycling (in relation to suppliers' products and services).

### *4.4 Product content*

Supplier shall respect all applicable laws and regulations regarding prohibition or restriction of specific substances. Hazardous chemicals and other materials in products, especially those included in the substances of Very High Concern list of the REACH regulation, are to be identified and managed to ensure their safe use, recycling or re-use and disposal. Their use has to be avoided and if impossible minimized.

Supplier shall have a clear policy and procedure in place to avoid purchasing conflict minerals or unsustainable mined minerals at high environmental and social costs. Supplier shall undertake reasonable due diligence within their supply chains to assure that the conflict minerals are being sourced from responsible and conflict-free sources.

#### *4.5 Energy consumption and GHG emissions*

Supplier shall develop products or services that are energy efficient and reduce Greenhouse Gas (GHG) emissions during the entire life cycle and value chain. Supplier should identify, monitor and minimize GHG emissions and energy consumption from its own operations including GHG emissions from transportation and travel. Supplier shall do this by making a self-declaration of supplier's annual energy consumption and GHG emissions that should be made publicly available. In this way we can stimulate standardized reporting which can be used in our scope three calculations. To proactively manage GHG emissions, supplier is expected to:

- a) Have emission reduction targets;
- b) Measure and provide emission metrics for GHG emissions;
- c) Take actions to reduce GHG emissions, e.g. by using renewable energy;
- d) Report GHG emission metrics annually and publicly;
- e) Have a process to engage its sub-suppliers to drive GHG emission reduction within supplier's operations and that of their sub-suppliers.

### **5. Ethical Conduct**

To maintain high ethical conduct and operate responsibly, suppliers shall observe the following requirements:

#### *5.1 Fair business practice & ethics*

Supplier shall uphold the highest standards of fair business, advertising and competition. This requires that goods and services offered must be free from anti-competitive practices such as price-fixing with competitors. Supplier shall endorse and observe the internationally accepted standards of business integrity. Supplier will not provide Glaspoort personnel with any form of compensation, reward, gift or other benefit, which may influence Glaspoort's personnel objective decision making.

#### *5.2 Anti-corruption & Bribery*

Supplier will refrain and will not tolerate, permit or engage in any form of unethical conduct, such as corruption, fraud, extortion and bribery. Instead, supplier will be committed to prevent corruption in all forms this may occur.

#### *5.3 Intellectual property*

The supplier must respect intellectual property rights.

### **6. Data and Privacy**

We require our business partners to ensure the sufficient protection of received data from Glaspoort in order to fulfil their contracts, rights to personal privacy of its employees and their personal data. Supplier will treat this data in accordance to EU General Data Protection Regulation, as well as any applicable national data protection and telecommunications legislation, to prevent, amongst others:

- > Loss of private customer data
- > Unauthorized access to employee records
- > IPR and or identity theft
- > Unprotected personal financial data

### **7. Other**

- > Glaspoort may reconsider its relationship with a supplier that does not comply with this code.

- > Supplier who cannot (fully) comply with this code will inform Glaspoort on his non-compliance and indicate when he will comply.
- > Upon request, supplier will deliver, within a reasonable time frame, relevant information to Glaspoort regarding the compliance with this code. Supplier acknowledges that Glaspoort may request further information (e.g. self-assessments / EcoVadis assessment).
- > Supplier will inform his employees and subcontractors of his compliance with this Code and will strive to have subcontractors accept the relevant terms of this Code as well.
- > Glaspoort will monitor compliance with this code with questionnaires and may audit supplier and its subcontractors. Supplier and subcontractors will improve its compliance based on the audit outcome.
- > Glaspoort and supplier will evaluate this code and seek actively for ways to improve it, both on its content and in expanding compliance to second and third tier suppliers.
- > At request of Glaspoort, supplier shall produce an annual sustainability report (CSR report).
- > If supplier suspects or has established any non-compliance to this Code, it shall report this immediately to Glaspoort. A report can be made via the contact person of Glaspoort, directly to the Compliance Officer via [compliance@glaspoort.nl](mailto:compliance@glaspoort.nl) or via the website of Glaspoort, please see: <https://www.glaspoort.nl/contact/#vraag>.