

VERTEXCO NV
CODE OF CONDUCT

Important note:

This document is a Policy that outlines the principles approved by Vertexco NV's management to guide the implementation of business processes and manage business risks in alignment with Vertexco's strategy.

For effective implementation of these principles, Vertexco's management will develop detailed procedures accompanied by instructions tailored to the specific nature of the operations covered by the Policy.

This, along with other approved policies and procedures, can be found on Vertexco NV's intranet. Please regularly consult the intranet for the latest updates on policies, procedures, guidelines, forms, and lists needed to implement a policy or procedure.

A. Introduction

Article 1. Purpose

Vertexco NV (0488.148.314) is committed to conduct business with the highest standards of ethics and integrity. Our Code of Conduct outlines the principles and policies that govern our actions and decisions to ensure compliance with all applicable laws, regulations and the highest ethical standards. We are committed to ensuring that the standards outlined in the Code of Conduct are effectively implemented, measured and monitored throughout all our processes.

Article 2. Scope of Application

The Code applies to all our employees, directors, independent service providers, suppliers and all other service providers who come to provide services at Vertexco (Hereinafter referred to as "the Party or Parties").

We expect our suppliers to adhere to the same standards as described in this Code of Conduct.

Article 3. Legal Compliance

We are committed to conducting our business ethically, responsibly and in full compliance with all applicable local, national, and international laws and regulations. The Parties must understand and adhere to the legal requirements and regulations that apply to their responsibilities.

B. Content of this Policy

Article 4. Ethical Business Practices

We believe in conducting business ethically and with integrity. This means acting honestly, fairly, and transparently in all our business dealings. We are committed to:

- Avoiding conflicts of interest and ensuring that personal interests do not interfere with professional duties. This means we comply with all applicable laws and regulations concerning bribery, corruption, fraud and any other prohibited business practices.
- Competing fairly and ethically in the marketplace: this means that we are committed to never causing or being involved in any violation of general or specific competition regulations, including illegal collaboration on pricing, unlawful market sharing, or any other behavior that contravenes applicable laws.
- Respecting the rights of all stakeholders, including employees, customers, suppliers, and the community.
- Offering nor excepting hospitality, expenses or gifts in situations of contract negotiations, bidding or awards our in any other situation.

Article 5. Confidentiality and Data Protection

We are committed to protecting the privacy and confidentiality of personal and proprietary information. The Parties must safeguard sensitive information and use it only for legitimate business purposes. We comply with all relevant data protection and privacy laws and regulations.

More detailed information can be found in our Privacy Policy.

Article 6. Health, Safety and Environment

The health and safety of the Parties and the communities in which we operate are of utmost importance. We are dedicated to maintaining safe and healthy work environments by adhering to all relevant health and safety laws and standards.

More detailed information can be found in our Environmental Policy and Workplace Health and Safety Policy.

Article 7. Human Rights and Labor Standards

We are dedicated to both protecting and embracing labor rights and human rights as embodied in the ILO Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights and its two corresponding covenants, The International Covenant on Civil and Political Rights and The International Covenant on Economic, Social, and Cultural Rights.

The standards outlined below reflect the values we uphold:

- **Diversity and Equality:**
We aim to provide equality of opportunity and treatment regardless of race, color, gender, religion, gender, sexual orientation, national origin, age, disability, or any status regarded as a human right. We support equal pay for work of equal value. We take action against any form of discrimination or intimidation towards employees including threats of physical and psychological abuse.
- **Appropriate Work Hours and Wages:**
We strive to comply with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits.
- **Respect Freedom of Association and Collective Bargaining:**
We respect employees' lawful right of free association, as well as their lawful right to join, form, or not to join a labor union or otherwise engage in collective bargaining.
- **Child Labor:**
We do not engage in or support, directly or indirectly, including any of our sub-contractors, customers or otherwise to the best of their knowledge, the use of child labor. ("Child Labor" being defined under ILO Conventions as workers under the age of 15, or 14 in certain developing countries. No hazardous work may be carried out by anyone under the age of 18).

- **Forced and Compulsory Labor:**
We do not use, directly or indirectly, including any of our sub-contractors, customers or otherwise to the best of their knowledge, forced or involuntary labor, including indentured labor, bonded labor or slave labor. Workers are not required to pay fees or leave lodge “deposits” or original identity papers with Vertexco and they are free to leave Vertexco after reasonable notice.
- **Education and skills development:**
We believe in respecting and promoting the right to education and training as the foundation of opportunity and progress. We are committed to continuous skills development to support the current and future workforce needs of our people.
- **Digital technology:**
Digital technologies are transforming how basic human rights are exercised. We believe in the ethical design, adoption, and use of new and emerging technologies to enhance lives, expand opportunities, and benefit society without adverse or discriminatory outcomes.

Article 8. Reporting and Accountability

We encourage employees to report any concerns or violations of this Policy.

Reporting can be done anonymously without fear of retaliation by any of the following methods:

- In writing, addressed to, Vertexco NV attn. management, Industrielaan 104 - 8930 Menen, OR;
- By e-mail to: info@vertexco.be

We are committed to investigating all reported violations and taking appropriate corrective action.

Article 9. Non-Retaliation

We strictly prohibit retaliation against any individual who reports suspected misconduct in good faith. This includes protection from discharge, demotion, suspension, threats, harassment, or any form of discrimination in employment terms. Employees who retaliate will face sanctions according to work regulations.

Key principles:

- Parties who have reasonable grounds to suspect that a violation of the Policy has occurred or may occur must be given the opportunity to report their concerns in accordance with this Policy.
- All reports will be handled objectively and confidentially.
- Designated personnel will investigate reports thoroughly and fairly within a reasonable timeframe.
- Parties reporting potential violations must not suffer any detrimental or negative consequences as a result of their disclosures, provided such disclosures are made in good faith.
- The rights and reputation of those reported on will be respected and protected.

Article 10. Enforcement, Reporting and Discipline

Adherence to this Code of Conduct is mandatory for all the Parties. Violations may result in disciplinary action, up to and including termination of the collaboration, as well as legal consequences.

Article 11. Compliance by our Suppliers

We endeavor to enforce all values outlined in this Policy upon our suppliers to the fullest extent possible. To ensure this, we have included clauses in our contracts with suppliers that allow us to conduct audits and inspections to verify compliance with these principles.

Article 12. Closing Provisions

By adhering to this Code of Conduct, we affirm our commitment to lawful and ethical behavior. We expect the Parties to embody these principles in their daily work and decision-making processes.

For any questions or further clarification regarding this Code of Conduct, please contact the HR-department.