

Walraven Supplier Code of Conduct

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Introduction

Being a family company, long-term thinking comes naturally to us. We are driven to take responsibility and make a sustainable difference from a human, economic and environmental point of view.

We do business from the heart and we strive for long-term relationships with our customers, employees, suppliers, partners and society as a whole. First and foremost, Walraven is about people.

Long-term thinking goes hand in hand with a good reputation which we earn through trustworthy behaviour, respect for all our stakeholders and our continuous, sustainable value-creation mindset. This is what makes us a responsible business partner.

We have trust and confidence in the integrity and ability of all our employees. We are satisfied that our activities are conducted not only within the law but also within the company's own policies, practices and expected behaviours.

We expect our suppliers to do the same. The Walraven Supplier Code of Conduct outlines the principles and directives that we apply when doing business with our suppliers.

Scope

The Walraven Supplier Code of Conduct applies to all our suppliers, sub-suppliers, and business partners. The Supplier Code of Conduct contains the principles and guidelines required throughout our supply chain concerning human rights, health and safety, work conditions, environmental responsibility, and business ethics.

Walraven will not accept any violations of this Supplier Code of Conduct. When a supplier is found not to be following an agreed directive, Walraven will take appropriate action, including demands of corrective measures or eventually termination of the relationship with the supplier.

Co-CEO Walraven Group, Pelle van Walraven

1. Business integrity

1.1 Compliance with laws

Our suppliers are expected to comply with all (local) laws and regulations applicable to their business activities.

1.2 Fair competition

Our suppliers must compete fairly and comply with applicable competition and antitrust laws. They are expected to avoid entering into agreements or practices that restrict competition, such as price-fixing, market allocation or abuse of a dominant position.

1.3 Export control

Our suppliers must not violate any national or international export controls or trade, economic or financial sanctions or embargoes applicable to them. Our suppliers must identify and manage trade restrictions applicable to their business, including those of sanctioned countries and parties.

1.4 Fraud prevention

Our suppliers are expected to conduct their work in an honest and reliable way. They must have internal control systems in place to detect, prevent and respond to fraud and money laundering. Any potential fraud that may have an impact on Walraven must be reported to us immediately.

1.5 No corruption, bribery or money laundering

We expect our suppliers to have zero tolerance for corruption. Our suppliers will not make, offer or authorise bribes or conduct any form of unethical business practices nor make facilitation payments. We expect our suppliers to refrain from offering or accepting gifts or entertainment that (a) are unreasonable or disproportionate or (b) are offered with the intention to induce a person to improperly perform their function to secure a business advantage. We expect our suppliers to comply with all applicable anti-money laundering laws throughout the world.

1.6 Avoiding conflicts of interest

In their business dealings with us, suppliers are expected to make decisions based on objective criteria only. Any factors that might influence the decisions of our suppliers due to private, business or other conflicts of interest must be avoided from the start. If an employee of a supplier is related to a Walraven employee, representing a potential conflict of interest in a transaction or business relationship, our supplier must disclose this fact to Walraven or ensure that the Walraven employee does so. The same applies to relatives and other related parties.

2. Responsible work environment

We expect our suppliers to be generally committed to applying the principles of the UN Global Compact and the Organization for Economic Cooperation and Development (OECD).

2.1 Health & safety

We strive for a healthy, safe, accident-free work environment for all our employees and expect our suppliers to do the same. They must apply all applicable safety rules and regulations and have procedures in place to report and manage safety incidents. We encourage suppliers to comply with the ISO 45001 and/or SA8000 standard.

2.2 No child or forced labour

Our suppliers shall abide by applicable legislation and regulations concerning child and adolescent labour, and they shall strictly refrain from employing children under the minimum age. Employees of our suppliers must not be working against their will, transported for exploitation, subject to slavery or servitude, nor be deprived of their rights.

2.3. Employment conditions

Our suppliers shall comply with all applicable legal and regulatory requirements and must be generally committed to applying the principles of the Universal Declaration of Human Rights and International Labour Organization (ILO). Working hours, wages and benefits must be fair and consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits. We expect our suppliers to respect individual rights of freedom of opinion and association, including the right to collective bargaining.

2.4 No harassment or discrimination

Our suppliers must not tolerate harassment of any kind. This includes but is not limited to harassment or discrimination based on race, colour, religion, gender, sexual orientation, national origin, age or disability, or any other type of behaviour that is hostile, disrespectful, abusive and/or humiliating.

2.5 Equal opportunities

We expect our suppliers to strive for equal opportunities for their employees.

3. Environment

Our suppliers must comply with all relevant environmental laws and ensure that the necessary permits are in place. Our suppliers are committed to the efficient use of raw materials, energy and other natural resources while minimising waste, emissions and noise. We encourage suppliers to comply with the ISO 14001 standard.

4. Intellectual property and communication

We expect our suppliers to respect intellectual property rights, including those of Walraven. There must be appropriate measures to prevent the disclosure or unauthorised use of confidential information that Walraven made available to them. Our suppliers will not issue any external communication about their business relationship with Walraven, including but not limited to press releases about Walraven without our prior written consent. Our suppliers will protect the personal data of Walraven employees and customers and use this data for legitimate and authorised business purposes only. Our suppliers must be clear about when and how they collect, use or share personal data. All personal data must only be processed

in accordance with applicable data protection laws and regulations. Upon a security breach, our suppliers must immediately notify Walraven in accordance with applicable laws and regulations.

5. Supplier relations

At Walraven, we expect our suppliers to communicate the business standards laid out in this Supplier Code of Conduct to their subcontractors and sub-suppliers and to take these business standards into account when selecting sub-contractors and sub-suppliers. Our suppliers are expected to encourage their subcontractors and sub-suppliers to comply with the standards laid out in this document.

6. Monitoring and assessment

We reserve the right to monitor compliance with this code of conduct through written supplier self-assessments, on-site audits by our own auditors, and external audits by independent auditors. Committing to take part in Supplier (self) assessments, audits and reporting to evaluate sustainability performance is prerequisite for doing business with us.

All applicable data privacy laws will be respected.

7. Corrective actions

If problems are identified, a clear procedure must be followed involving a corrective action request from Walraven to the supplier. The supplier is required to have a corrective action plan and an implementation plan will be monitored.

8. Review and improve

This Supplier Code of Conduct will be periodically reviewed every other year by the Management of J van Walraven Holding BV to ensure its ongoing relevance and effectiveness. We will consider changes in regulations, industry best practices, and stakeholder expectations to update and improve our Supplier Code of Conduct as necessary. This policy was last updated in January 2024.

9. Reporting Code of Conduct violations

If you experience or witness behaviour that violates the Walraven Supplier Code of Conduct, report this to the counsel@walraven.com.

Acknowledged and Accepted:

Supplier Name.....
Signed by.....
Title.....
Date.....

Signature.....

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