



VIRMAGROUP

Supplier Code of

Conduct

Introduction

As reflected in the VIRMAGROUP Code of Conduct, VIRMAGROUP is committed to high standards of integrity and sustainability. VIRMAGROUP has a 'zero tolerance' policy when it comes to unethical business behaviour, such as bribery and corruption. We expect all of our suppliers to adhere to similar standards and to conduct their business ethically.

As a supplier, you must comply with all applicable laws and regulations, the requirements set out in this VIRMAGROUP Supplier Code of Conduct and your contractual obligations to us.

This VIRMAGROUP Supplier Code of Conduct defines the main principles underlying your business activities as one of our suppliers. More specific guidance, including information on hazardous substances and conflict minerals and where to go for questions, is available on <https://virmagroup.com/en/company#download>

A. Human rights

As a supplier to VIRMAGROUP, you shall

- respect the personal dignity, privacy and rights of each individual;
- refuse to make any person work against his or her will; and
- prohibit behaviour including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.

B. Fair labour conditions and child labour

You shall ensure fair labour conditions. In particular, you will

- refrain from employment discrimination based on gender, age, ethnicity, nationality, religion, disability, union membership, political affiliation or sexual orientation;
- respect the rights of employees to freely associate and bargain collectively;
- not tolerate or use child labour in any stage of your activities other than in accordance with all applicable laws and regulations;
- not use any forced labour or involuntary prison labour and allow all employees the choice to leave their employment freely upon reasonable notice;
- compensate employees fairly and follow local wage regulations and / or collective agreements, and where these do not exist, compensate employees so at the minimum they can meet their basic needs;
- ensure that working hours, including overtime, do not exceed applicable legal requirements, and where such requirements do not exist, we recommend that working hours not exceed sixty hours per week including overtime; and
- ensure that employees are allowed at least one uninterrupted day off per week.

C. Health, safety and environmental management

You shall provide a safe and healthy workplace for all of your employees and shall conduct your business in an environmentally sustainable way. In particular, you will

- formally appoint a competent person to manage health, safety and environmental programs and improvements;
- establish appropriate organizational structures and procedures for the effective management of health, safety and environmental risks; and
- ensure that all workers are sufficiently aware of these risks and appropriately trained on the implementation of control measures.

D. Material compliance and conflict minerals

At VIRMAGROUP, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals.

Therefore, suppliers shall ensure that the goods provided to VIRMAGROUP are in compliance with requirements covered under the scope of all relevant regulations. In particular, you will

- declare to VIRMAGROUP substances which are listed in the “VIRMAGROUP List of Prohibited and Restricted Substances” and contained in the goods you supply to VIRMAGROUP;
- implement a policy regarding conflict minerals and exercise due diligence to investigate the source of these minerals; and
- respond in a timely manner to VIRMAGROUP’s requests for evidence of your compliance with these requirements.

E. Business ethics

You shall conduct your business in an ethical manner. In particular, you will

- refrain from any and all forms of corruption, extortion and bribery, and specifically ensure that payments, gifts or other commitments to customers (including VIRMAGROUP employees), government officials and any other party are in compliance with applicable anti-bribery laws;
- adhere to anti-trust and other competition laws;
- disclose to VIRMAGROUP information regarding potential conflicts of interest relating to your activities as an VIRMAGROUP supplier, including disclosure of any financial interest an VIRMAGROUP employee may hold in your business;
- protect all confidential information provided by VIRMAGROUP and our respective business partners;
- respect intellectual property of others, including VIRMAGROUP; and
- adhere to international trade regulations and export control regulations.

F. Secure business

You shall conduct your business in a secure manner. In particular, you will

- implement reasonable measures for minimizing exposure of VIRMAGROUP to security threats such as terrorism, crime, pandemics and natural disasters; and
- when visiting or working at VIRMAGROUP locations, abide by VIRMAGROUP’s security procedures and report any security concerns to the appropriate VIRMAGROUP channels.

G. Procurement by supplier

You shall procure goods and services in a responsible manner. In particular, you will

- select your own tier one supplier’s providing goods or services directly or indirectly to VIRMAGROUP based on them agreeing to adhere to standards comparable to those set forth in this VIRMAGROUP Supplier Code of Conduct; and
- when working at VIRMAGROUP locations, only subcontract work with prior consent from VIRMAGROUP.

H. Inspections and corrective actions

In order to ensure and demonstrate compliance with the VIRMAGROUP Supplier Code of Conduct, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request.

To verify your compliance, we reserve the right to audit and inspect your operations and facilities, at our own cost and upon reasonable notice, with or without support of a third party. If the results of



such an audit or inspection cause us to be of the opinion that you do not comply with this VIRMAGROUP Supplier Code of Conduct, you shall take necessary corrective actions in a timely manner, as directed by us. If you fail to comply with this VIRMAGROUP Supplier Code of Conduct, then we may take action against you, including suspending or terminating your activities as one of our suppliers.

I. Access to remedy

In the context of our business relationship, if you or your employees believe that the terms of this VIRMAGROUP Supplier Code of Conduct are not adhered to, or that VIRMAGROUP is not acting in accordance with its own VIRMAGROUP Code of Conduct, then we encourage you to raise your concerns via the VIRMAGROUP stakeholder reporting channels.

Visit <https://virmagroup.com/en/company#download> to learn more about these reporting channels.

Sincerely,

Head of VIRMAGROUP Supply Chain Management