



proximus

Group Procurement

Supplier Code of Conduct

Publication date	01/05/2021
Next review date	01/05/2021
Contact	Proximus Group Procurement
E-mail	procurement@proximus.com

Table of contents

Table of contents	1
Proximus views its suppliers as partners and cares about the way our suppliers do business.....	2
1. Comply with laws	3
2. Labour and human rights.....	3
2.1 Non-discrimination.....	3
2.2 Bullying, Harassment and Disciplinary Practices	3
2.3 Freedom of Association.....	3
2.4 Wages and Benefits.....	4
2.5 Working Hours.....	4
2.6 Forced and Compulsory Labour	4
2.7 Child and Underage Labour	4
2.8 Wellbeing	4
3. Environmental considerations.....	5
3.1 Environmental Laws, Permits and Reporting.....	5
3.2 Product Content.....	5
3.3 Pollution Prevention and Resource Efficiency.....	6
3.4 Reduce the use of virgin raw materials.....	6
3.5 Climate Change and Energy Consumption.....	6
4. Business integrity	6
4.1 Conflict of Interest.....	6
4.2 Fraud, Bribery and Corruption	6
4.3 Responsible Sourcing of Minerals	7
4.4 Trade Controls.....	7
4.5 Intellectual Property and Fair Competition.....	7
4.6 Protection of Identity	7
5. Cyber Security, Privacy and confidentiality.....	7
6. Diversity.....	8
6.1 Effective management	8
6.2 Enforcement provisions.....	8
6.3 Continuous improvement.....	9

Proximus views its suppliers as partners and cares about the way our suppliers do business.

This Supplier Code of Conduct (Code) sets out the minimum standards of behaviour that Proximus expects its suppliers to meet in the areas of labour and human rights, health and safety, environment, business integrity, cyber security and privacy, and supplier diversity.

This Code is aligned with the United Nations Global Compact ten universally accepted principles, Responsible Business Alliance (RBA) Code of Conduct, Joint Audit Cooperation (JAC) Supply Chain Sustainability Guidelines and other internationally recognised standards. This Code also reflects our commitment to support the EU's Green Deal Goals of the European commission, making Europe climate neutral by 2050, boosting the economy through green technology, creating sustainable industry and transport, and cutting pollution.

Suppliers must read, understand and ensure that their business and supply chain meet these standards. Suppliers must communicate this code to related entities, their own suppliers and subcontractors who support them in supplying to Proximus, so that they are aware of, understand and comply with this Code. Suppliers shall abide by the following requirements to achieve and maintain safe and fair working conditions and the responsible management of social and environmental issues.

Suppliers' ability to meet or exceed standards detailed in this Code will

be taken into account by Proximus when making procurement decisions as Proximus expects all suppliers to adhere to this Code. This will happen regardless of whether or not the Code has been formally incorporated into a particular contract with the supplier. This Code is without prejudice to additional social, environment, ethical, privacy or cyber security requirements into procurement contracts to address specific risks of an agreement

By Supplier, Proximus means any individual or entity (including consultants and channel partners) that supplies goods or services to Proximus PLC or its related companies anywhere in the world. Where this Code refers to workers, this includes employees, contractors, agency, migrant, student and temporary staff of the supplier and of its related entities.

1. Comply with laws

Suppliers must comply with all applicable laws and regulations in the countries where they operate

2. Labour and human rights

At Proximus, we respect and support human rights as set out in the International Bills of Human Rights and the ten principles of the UN Global Compact, in line with the UN Guiding Principles on Business and Human Rights. We expect suppliers to respect and support the protection of human rights of workers, as well as individuals and communities affected by their activities.

When suppliers become aware of a labour incident within their company or supply chain which is in breach of this code, they must disclose it using the Supplier Self- Disclosure Form.

2.1 Non-discrimination

Suppliers must not engage in or support discrimination in hiring and employment practices, including on grounds of gender, age, religion, ethnicity, race, cultural background, disability, physical features, marital relationship status, sexual orientation, gender identity and expression, pregnancy or potential pregnancy, family responsibilities, political beliefs, industrial activity, union membership, irrelevant criminal record, nor personal association with a person who possesses or is thought to possess any of these attributes.

2.2 Bullying, Harassment and Disciplinary Practices

Suppliers must not use violence, threats of violence or other forms of physical coercion or harassment. Corporal punishment, mental, physical, or verbal abuse, sexual harassment or sexual abuse, and harsh or inhumane treatment are prohibited.

2.3 Freedom of Association

Suppliers must respect workers' freedom of association, recognise and protect their right to collective bargaining and to form, join and administer workers' organisations.

Suppliers must protect against acts of interference with the establishment, function or administration of workers' organisations in accordance with applicable laws. Where the right to freedom of association and collective bargaining are restricted under the law, suppliers must allow workers to freely elect their own representatives.

Suppliers must not discriminate, harass, intimidate, or retaliate against workers for being members of a union or participating in trade union activities, and provide worker representatives with access to their workplace.

2.4 Wages and Benefits

Suppliers must make conditions of employment clear when hiring by providing employees with written documentation which outlines the basic terms and conditions of employment in a language they can understand.

Suppliers must comply with applicable laws relating to wages and benefits (including minimum wages, overtime pay, and piece rates). Suppliers must not use deductions from wages as a disciplinary measure and must pay workers in a timely manner.

2.5 Working Hours

Suppliers must not require workers to exceed prevailing local work hours under applicable laws, and under International Labour Organisation (ILO) standards. Employees must be allowed at least one day off per seven-day week.

2.6 Forced and Compulsory Labour

Suppliers must not use any form of forced, bonded, compulsory labour, slavery or human trafficking in any part of their business operations. Suppliers must not require workers to surrender any government issued identification, passport or work permit or other personal document as a condition of employment. Workers shall not be required to pay employers' or agents' recruitment or any other fee for their employment.

2.7 Child and Underage Labour

Child labour is strictly prohibited. The minimum age for employment or work is the higher of: 15 years of age, the minimum age for employment in the relevant country, or the age for completing compulsory education in the relevant country. This Code does not prohibit participation in workplace apprenticeship programs or light work as defined by the ILO. Children under the age of 18 must not be employed for any hazardous work or work that is inconsistent with their individual development.

2.8 Wellbeing

At Proximus, no job is so important or urgent that it cannot be done safely. To achieve our goal of zero accidents with our suppliers, Proximus focuses on requiring a high level of qualification and stringent evaluations of suppliers.

Our suppliers play a significant role in our business and our commitment to keep each other, our workers, customers and the public safe.

Suppliers must identify and comply with relevant workplace and product wellbeing laws and ensure their workers understand and follow health and safety policies, standards and procedures that apply to their work.

Suppliers must provide a safe and healthy workplace and care for their workers and anyone that could be impacted by their activities by:

- taking reasonable steps to identify workplace hazards and minimize the risk of workplace injury, illness and disease for workers;
- providing appropriate equipment, resources, instruction, education and training for workers to safely carry out their duties, including protective equipment;
- engaging with workers, customers, members of the community, and Proximus to manage wellbeing risks;
- implementing effective systems to ensure products and service delivery meet relevant standards and legislative requirements, and safety considerations are taken into account throughout the product lifecycle;
- ensuring facilities and amenities for workers (including any accommodation provided) are clean, safe and meets their basic needs. Basic needs include providing ready access to clean toilet facilities, potable water, and where accommodation is provided, hot water for bathing, adequate heating and ventilation, reasonable personal space and reasonable permission to enter and exit facilities;
- monitoring the health of workers and the safety and ergonomic conditions at the workplace for the purpose of preventing illness or injury of workers arising from the suppliers' business activities; and
- supporting workers to raise wellbeing issues or concerns without fear of disciplinary action, dismissal or discrimination.

Suppliers must prepare for, respond to, manage and report workplace incidents, injuries and emergencies, providing medical assistance to impacted parties as required.

Suppliers must have systems, training and emergency equipment in place to effectively respond to and manage incidents and emergencies.

3. Environmental considerations

Suppliers must minimise the adverse environmental impacts of their operations, products and services. We expect suppliers to implement an environmental management system in line with recognised standards such as ISO 14001, EMAS (or equivalent).

3.1 Environmental Laws, Permits and Reporting

Suppliers must comply with applicable environmental laws, standards and notices from regulators. Suppliers must obtain, maintain, keep current and comply with necessary environmental permits, approvals and registrations.

3.2 Product Content

Suppliers must deliver electrical or electronic equipment in line with relevant regulations in the regions of operation and of intended equipment use (e.g. RoHS and REACH in the European Union (EU)). Suppliers shall develop products or services that achieve improved environmental performance across the whole lifecycle including low energy consumption, delivering GHG emissions reductions and product reuse or recycling.

3.3 Pollution Prevention and Resource Efficiency

Suppliers must identify, monitor, minimise and treat hazardous pollutants released to air, water and soil. This includes management of wastewater such as discharges and spills entering storm drains and release of air emissions such as volatile organic compounds, chemicals with ozone depleting potential, particulates and combustion by-products.

3.4 Reduce the use of virgin raw materials

Suppliers shall work to reduce the use of raw materials and resources in their operations, as well as the elimination, substitution, re-use and recycling of materials and solid waste. Packaging supplied to Proximus shall be sustainably sourced, made from recycled content and recyclable where possible.

3.5 Climate Change and Energy Consumption

Suppliers must identify, monitor and minimise greenhouse gas (GHG) emissions and energy consumptions from their own operations. Proximus has committed to becoming carbon neutral by 2030 and we expect our suppliers to assist us to achieve this outcome. On request, suppliers will work with Proximus to set Scope 1,2 and 3 GHG emission targets, and support Proximus in providing data on Scope 1,2 and 3 GHG emissions and energy consumption (including energy efficiency ratings and lifecycle carbon footprint), for products and services the supplier provides to Proximus.

4. Business integrity

At Proximus, we act with honesty and integrity and don't make or receive improper payments, benefits or gains. Suppliers must act ethically and be honest, transparent and trustworthy in all their dealing with others.

4.1 Conflict of Interest

Proximus requires its Suppliers to be free from any conflicts of interest. Conflict of interest situations may arise in many ways. If a Supplier feels that it has an actual or potential conflict with Proximus or any of its employees, the Supplier must disclose such conflict to Proximus management as documented in the whistleblowing section at the bottom of this document.

4.2 Fraud, Bribery and Corruption

Suppliers must comply with applicable anti-bribery and anti-corruption laws and must have adequate policies and procedures in place to monitor compliance with such laws.

Proximus strictly prohibits fraud, corruption, extortion, embezzlement, collusion, bribes, pay-offs, "facilitation payments" (payments to speed up routine actions), secret, unjustified or inflated commissions, kickbacks and any like payments or improper benefits which may include gifts, whether directly or indirectly, no matter how large or small in value. This includes payments to or from any person (including public

officials, foreign officials, foreign political parties or candidate for foreign political office) for the purpose of assisting a party to obtain or retain business for or with, or to direct business to, any person. This applies even if it is legal or common practice in a country.

Fair Business, Advertising and Competition Standards of fair business, advertising and competition are to be upheld.

4.3 Responsible Sourcing of Minerals

Suppliers must exercise due diligence to reasonably assure that the minerals they use in their supply chain do not originate from regions associated with armed conflict and do not directly or indirectly finance or benefit groups that are perpetrators of serious human rights abuses.

Suppliers shall also exercise due diligence to reasonably assure that the minerals they use in their supply chain are not supplied by businesses or organizations engaged in any form of slavery.

4.4 Trade Controls

Suppliers must comply with all applicable laws and regulations relating to sanctions, export, re-export, import and trade controls (including, laws and regimes enacted by Belgium, the UN, the US and the EU).

4.5 Intellectual Property and Fair Competition

Suppliers must respect intellectual property rights of Proximus and other third parties. Any transfer of technology and knowhow must be handled in a manner that protects intellectual property rights.

Suppliers must conduct their business in full compliance with anti-trust and fair competition laws, and disclose information regarding business activities, structure, financial situation, and performance in accordance with applicable laws.

4.6 Protection of Identity

Supplier shall have a communicated process for their personnel to be able to raise any concerns without fear. Supplier shall maintain programs ensuring the confidentiality and protection of any employee reporting through speak up or whistle-blowing procedures.

5. Cyber Security, Privacy and confidentiality

We expect our suppliers to work with us to protect Proximus and our customers' and employees' data and networks. Suppliers must implement industry best practice or standard technical and organisational security measures that align with Proximus' Security Schedule, including managing and monitoring their supply chain to protect Proximus and our customers' and employees' data and networks from breaches and unauthorised access. Suppliers must treat Proximus and our customers' and employees' data as confidential information and only use that data for the purposes of providing services to Proximus. When suppliers become aware of a data or network breach, they must immediately notify Proximus.

Proximus' Privacy Policy outlines our privacy commitment and explains how we collect, use, disclose and protect personal information. Privacy is a non-negotiable part of how we work. Suppliers must apply adequate data privacy and security protection to protect the personal information from unauthorised access, use and disclosure. Suppliers who collect, use, store or have access to our customers' and employees' personal information must have adequate processes and procedures in place to monitor compliance with applicable privacy laws and contractual privacy obligations with Proximus. This includes suppliers not doing anything which would cause Proximus to be perceived as acting inconsistently with the Proximus Privacy Policy and the General Data Protection Principles.

Data privacy is of the highest priority and Suppliers must apply adequate data privacy and security protection to protect the personal information of Proximus's customers and employees from unauthorised access, use and disclosure.

6. Diversity

Proximus believes that diversity makes our teams richer. In that spirit, our suppliers have to ensure that no discrimination exists on the grounds of race, colour, gender, language, religion, political opinions, nationality, social background and status, union membership, age, health status or disability.

6.1 Effective management

Suppliers shall develop, maintain and implement policies consistent with this Code and maintain appropriate management systems and documentation to demonstrate compliance with the Code.

Suppliers must provide workers, their suppliers, and members of the community in which they operate or provide services with a confidential means to report violations of this Code. Suppliers must have procedures allowing workers to bring workplace concerns to the attention of management or Proximus for resolution and communicate these procedures to workers. The procedures, and associated communication, must be accessible, culturally appropriate and in a language, workers understand. Workers must be able to openly communicate and share concerns about working conditions and management practices without fear of retaliation.

Risks out of labour practice, health and safety, environmental and ethics shall be assessed, and corrective actions shall be conducted immediately. Supplier shall drive self-audits to ensure conformity to legal and regulatory requirements, the content of customer codes and contractual requirements related to social and environmental responsibility.

The Supplier shall appoint a senior management representative to be responsible for ensuring a safe and healthy workplace environment for all personnel and for implementing the health and safety elements of the above standard

6.2 Enforcement provisions

Proximus may at any time review or audit a supplier's compliance with this Code. In such event the supplier should co-operate by providing information, documents and access to staff, as Proximus reasonably requires.

If a supplier becomes aware of a reasonable risk of a breach of this Code, the supplier must notify Proximus as soon as practicable. Suppliers must use the Whistleblowing Procedure (see below) to disclose conflicts of interest relating to Proximus employees and labour practices incidents. Any identified deficiencies must be corrected on a timely basis as directed by Proximus.

Where Proximus has reasonable grounds to suspect a breach of this Code by a supplier, Proximus may require the supplier to take additional steps which may include the provision of additional information or certification or, in serious cases, submit to an independent audit at the supplier's premises at the supplier's cost. We take this Code seriously and any material non-compliance may result in the termination of the supplier's business relationship with Proximus.

The Proximus Group Investigations Department is authorised to conduct investigations under the authority of the Director of Security Governance & Investigations.

His mission is to investigate all facts that have a negative impact on the company. Every action notified and related to Proximus suppliers that impacts the integrity of goods, personnel or reputation of the Proximus Group can be subject to investigation.

6.3 Continuous improvement

Suppliers shall set up performance objectives, targets and implementation plan to continuously improve social and environmental performance. Suppliers are encouraged to use a Plan-Do-Check-Act type of approach when approaching improvements

Proximus' Whistleblowing Procedure



It is important to us that anyone can report about illegal and unethical behaviour, or non-compliance and infringement of this Code of Conduct.

Investigations will be conducted only internally by the Proximus Group Investigation department under the limits of their authority. Charges can be reported confidentially and anonymously to:
whistleblower@proximus.com

more info can be found here:
<https://www.proximus.com/investors/compliance.html>