



Code of conduct  
For business partners  
2023

## Our commitment

It is JPG Hulsebosch belief that how we operate as a company, and as individuals, is based on the principle of doing the right thing for our clients, employees, business partners and the environment. We operate within the spirit and letter of the law, maintaining high ethical standards wherever we conduct business. We expect our partners to share our values and promote the application of these high standards both within their organization and throughout their business network.



Founder & Managing Director

Iwan J.P.G. Hulsebosch

## Our Compliance definition

This Code applies to all JPG Hulsebosch external business partners and suppliers. Compliance with the Code is in addition to any agreement or contract between JPG Hulsebosch and our suppliers. JPG Hulsebosch will only do business with suppliers that comply with all applicable legal and regulatory requirements in the countries in which they do business. JPG Hulsebosch reserves the right to conduct audits to assure compliance, which may include assessing and scoring its suppliers using third party platforms. Any break of this Code will be considered a material break of the applicable framework agreement or contract.

The provisions of this Code extend to all workers of our suppliers, including workers who are engaged informally, on short-term contracts, or on a part-time basis. It is the responsibility of suppliers to ensure that their subcontractors uphold the standards of this Code. Suppliers are expected to communicate the content of this Code to their workers and subcontractors and ensure that all measures are implemented accordingly.

In today's challenging environment where there is growing regulation and enforcement activity, JPG Hulsebosch requires its suppliers to be knowledgeable about and compliant with all applicable regulations and be committed to a high level of regulatory compliance. Suppliers doing business with JPG Hulsebosch are also expected to comply with their contractual obligations under any purchase order or agreement with JPG Hulsebosch.

JPG Hulsebosch reserves the right to update and amend this Code, and to inform suppliers of any such amendments, in a timely manner.

# Contents

1. Human & Labor Rights
2. Health - Safety & Sustainability
3. Integrity & Corruption
4. Privacy & Confidentiality
5. Mutual Commitments

## Human & Labor Rights

JPG Hulsebosch confirms its commitment to ensuring that the supply chains it employs in the sourcing and manufacturing of its products do not include, utilize or tolerate human trafficking, slavery and forced or child labor, and comply with all applicable laws.

Everyone deserves to be treated with dignity and respect, and we must all work to create a positive and professional workplace. JPG Hulsebosch is committed to providing equal employment opportunities and prohibits any form of unlawful employee discrimination or harassment by its suppliers

### **Discrimination**

Suppliers shall not discriminate with regard to race, color, gender, language, religion, union membership, political opinion, caste, national origin, birth, union affiliation, sexual orientation, health status, age, disability, marital status or other characteristics protected by law.

Any employment-related decisions, from hiring and access to training, to termination and retirement, shall be based only on relevant and objective criteria such as merit, attitude, work ethic, skills and work experience.

### **Child Labor**

Suppliers shall not engage in or benefit from the use of child labor. The minimum age for full-time employment shall be as recommended by the law of the local country. Some examples:

- A child is defined as a person under 18 years old. The minimum age for employment is defined as the local legal minimum age for employment or the age for completing compulsory education.

For JPG Hulsebosch suppliers, the minimum age for employment will be in no case lower than 15 years old.

- Child labor is defined as work that is harmful to children i.e., work which is exploitative, prevents children from getting an education or jeopardizes their physical, mental or moral wellbeing.
- There shall be no new recruitment of child labor.
- Children under 18 shall not be employed at night or in hazardous conditions.

### **Forced Labor & Human Trafficking**

Suppliers shall not participate in or benefit from any form of forced labor, including bonded labor, indentured labor, involuntary prison labor, slave labor or human trafficking. Workers shall be allowed to move around freely, leave their place of work when their shift ends and be free to leave their employer after reasonable notice.

Suppliers will prohibit corporal punishments, threats of violence, the use of monetary fines and any other form of mental or physical abuse, coercion or intimidation. Suppliers shall not retain employees' original identity papers or any other original official documentation, or request employees to pay a deposit as part of their conditions of employment.

### **Harassment**

Physical abuse or discipline, the threat of physical abuse, sexual or other harassment and verbal abuse or other forms of intimidation shall be prohibited.

## Human & Labor Rights

### **Employee Benefits & Compensation**

Suppliers shall adhere to all applicable national laws or industry standards relating to wages, working hours, overtime and benefits. All workers shall be provided with written and understandable information about their employment conditions in respect to wages before they enter employment and about the particulars of their wages for the pay period concerned each time that they are paid. Deductions from wages as a disciplinary measure shall not be permitted nor shall any deductions from wages not provided for by national law be permitted without the expressed permission of the worker concerned. All disciplinary measures should be recorded.

Suppliers shall grant all employees labor rights as provided by national legislation.

Employment of temporary workers must comply with relevant national employment laws

### **Freedom of Association & Collective Bargaining**

Suppliers shall respect the right of employees to form and join trade unions and to negotiate collectively. Suppliers shall not attempt to influence employees to be members of a particular trade union, and shall not dismiss employees solely because of their affiliation to a trade union.

Workers representatives are not discriminated against and have access to carry out their representative functions in the workplace.

Where the right to freedom of association and collective bargaining is restricted under law, the supplier should not hinder the development of parallel means for independent and free association and bargaining.

### **Reporting Systems**

JPG Hulsebosch expects suppliers to have systems in place to detect and resolve any noncompliant treatment of workers, including any treatment that would violate any provision of this Code. JPG Hulsebosch expects recruitment agencies that work in the JPG Hulsebosch supply chain to train their employees who are assigned to work on the JPG Hulsebosch account to ensure they understand all the requirements of this Code.



## Health - Safety & Sustainability

### Health - Safety

Suppliers must comply with all applicable health and safety laws, rules, regulations and industry standards, and ensure that their workers are offered a safe and healthy working environment, including, but not limited to, protection against fire, accidents and toxic substances. We expect our suppliers and partners to take all reasonable and necessary precautions to prevent accidents and injuries, analyze and minimize health and safety risk exposure, protect their physical assets, ensure business continuity and engender public trust. A supplier must ensure that:

- A safe and hygienic working environment shall be provided, bearing in mind the prevailing knowledge of the industry and of any specific hazards. Adequate steps shall be taken to prevent accidents and injury to health arising out of, associated with, or occurring in the course of work, by minimizing, so far as is reasonably practicable, the causes of hazards inherent in the working environment.

- Workers shall receive regular and recorded health and safety training, and such training shall be repeated for new or reassigned workers.
- Access to clean toilet facilities and to potable (drinking) water and, if appropriate, sanitary facilities for food storage shall be provided.
- Accommodation, where provided, shall be clean, safe, and meet the basic needs of the workers.
- A health and safety policy is in place. JPG Hulsebosch supports the use of ISO 45001 standards,

### Sustainability

Suppliers must be committed to full compliance with the environmental laws and regulations applicable to our business through their administration of a comprehensive environmental management system.

Suppliers shall comply with all relevant and applicable national or regional environmental legislation. Suppliers shall maintain awareness of current environmental legislative requirements relevant to the environmental impacts of their activities, products and services. They must ensure legal compliance through training, awareness, operational control and monitoring.

Suppliers shall work systematically to prevent, minimize and remedy adverse environmental impacts, such as air, noise, ground and water pollution, from their activities, products and services by means of a proactive approach and management of their environmental responsibilities.

JPG Hulsebosch supports the use of ISO 14001 standards,





*Within our branch we feel responsible to contribute to the environment whenever possible.*

**Achieved**

Certified for ISO 9001, 14001, 27001 and the 45001  
 Active waste management; recycling (collecting and disposal)  
 Sustainable warehouse; LED lighting, solar tubes  
 FSC certified wood suppliers  
 Eco Drive on all our transport vehicles In addition to that we support Electric passenger vehicles for our colleagues  
 2000m2 solar panels  
 EcoVadis Platinum rating



TOTAL WASTE MANAGEMENT

JPG Hulsebosch has a controlled waste process that is securely managed by Green waste.



SUSTAINABLE MATERIALS

We highly respect our forests. The wood that we process is FSC certified and produced with responsible forest management.



SOLAR SOLUTION

JPG Hulsebosch has 1400m2 solar panels to achieve an electricity neutral position



SAFETY

We care about our people and their safety. We strictly follow the ISO 45001 guidelines.



## Integrity & Corruption

Suppliers must conduct business with honesty and integrity and demonstrate the highest standards of business ethics. Suppliers must not engage in bribery, corruption or other unethical or illegal practices, whether in dealing with government officials, political parties or others, including individuals in the private sector. Suppliers shall have appropriate internal controls to safeguard against these practices. Suppliers shall comply with all applicable anticorruption statutes and shall maintain accurate financial books and records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.

In addition, suppliers must ensure that:

- Suppliers do not enter into any agreements or understandings with competitors or others that restrict competition, fix prices, rig bids, allocate markets or limit sales.
- To prevent financial fraud and money laundering, any payment by JPG Hulsebosch to a vendor, supplier or other third party must be made to an onshore bank account titled in the name of the contracted vendor, supplier or other third party.
- Suppliers have a policy and procedure in place to ensure employees avoid a situation where a conflict of interest arises.

### **Corruption, Gifts & Entertainment**

Suppliers shall not engage in any form of bribery, corruption, extortion or embezzlement, or otherwise seek to unjustly influence private individuals, public officials and/or the judiciary in order to obtain any improper benefit or advantage. Suppliers shall abide by all applicable anti-corruption law and regulations including commercial bribery in all countries in which they operate. Suppliers shall only provide gifts that are not extravagant and any travel or entertainment provided by suppliers shall be reasonable and appropriate. Any gifts, travel and entertainment shall not be for the purposes of corruptly influencing any public official in their duties or to secure an unfair business advantage. Suppliers will not offer any funding, donations, gifts and entertainment to any JPG Hulsebosch employees.



## Privacy & Confidentiality

### **Employee & Data Privacy**

Suppliers shall respect the privacy of their employees as well as those whose personal data JPG Hulsebosch entrusts with them to provide products or services. We expect them to properly protect and use personal information. Our suppliers must not trade in, sell or lease any personal information.

### **Confidentiality**

JPG Hulsebosch respects the confidential information of others and expects that suppliers will not seek to obtain or disclose the confidential information of JPG Hulsebosch or other companies or persons. Confidential information includes, for example, intellectual Property, brand information, drawings, product information, sales and marketing plans, company business plans and any other sensitive or proprietary information.

### **Social Media**

Productions commissioned by JPG Hulsebosch can only be shared on Social Media with our permission.

JPG Hulsebosch supports the use of ISO 27001 standards for all our suppliers.

## Mutual commitments

### JPG Hulsebosch

The code of conduct document affirms our desire to;

- Share our corporate Social Responsibility approach with our partners
- Continually work to promote transparency, dialogue and information sharing regarding best practice in order to encourage continuous improvement in the practice of our partners and those of their own suppliers and service-providers relating to sustainable development, in the areas; environmental, social and business ethics.
- Be available to our partners to answer any questions and help them to roll out their plan to continually improve performance.

Iwan JPG Hulsebosch  
Managing director

Signature:

**Partner:** .....

We hereby confirm that;

- We have received and read JPG Hulsebosch' s code of conduct and have send it to our colleagues.
- We unreservedly commit to the principles therein, further undertaking to effectively implement the by preforming all required monitoring and audits within our businesses.
- We agree to assure that our partners also commit to the aforementioned principles and to effectively implement them in their businesses.

Date: .....

Company name: .....

Representative name: .....

Representative title: .....

Signature:

Logo / company seal




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