

Supplier Code of Conduct - 2026

Dear valued supplier,

Since 1919, Citribel has built on a foundation of expertise and trust to deliver high-quality products. Today, we continue this journey with a strong focus on circularity, sustainability, and innovation. We all have a huge responsibility to protect human rights and the environment, not only locally but throughout the entire supply chain.

This Supplier Code of Conduct is designed to ensure that Suppliers, third-party Suppliers and subcontractors (hereinafter "Suppliers") meet our principles and commitments to ethical practices, while fostering a sustainable and resilient supply chain. These principles are in full compliance with all applicable laws and regulations in force.

Citribel expects its Suppliers to comply with relevant legislation and internationally recognized environmental, social and governance (ESG) standards, including those contained in our Supplier Code of Conduct.

Suppliers must collaborate along their supply chain to continuously improve and protect the environment as well as to respect human rights.

Citribel expects its Suppliers to:

- Comply with all applicable environmental laws and permits
- Contribute to the United Nations' Sustainable Development Goals (UN SDG's)
- Comply with the ETI base code
- Continuously strive to reduce energy and water use and the use of other primary resources
- Reduce CO2 emissions
- Minimize waste
- Minimize nuisance towards the local communities
- Respond adequately to emergency situations
- Work together with your Suppliers to reduce their carbon footprint

Citribel wants to uphold these values together with its Suppliers so we can drive positive impacts for people, communities, and for our planet.

All our efforts will enable us to decrease our overall environmental footprint and ensure sustainable and responsible business throughout the entire supply chain.

Citribel will evaluate the compliance of its Suppliers in relation to this Code of Conduct.

Any violation or breach of this Code of Conduct could compromise the Supplier's commercial relationship with Citribel, which can lead to the termination of the existing contract.

By signing this document, you agree with the principles set out in this Code of Conduct. We therefore kindly ask you to send back the signed Supplier Code of Conduct.

Best regards,

Citribel nv

1 Ethics and anti-corruption

1.1 Business integrity

Suppliers must adhere to the highest ethical standards to meet our business integrity by avoiding all forms of bribery, corruption, extortion or money laundering.

Suppliers shall not offer or accept bribes or other unlawful inducements to or from their business partners. Gifts from Suppliers and other relationships should be approached with caution. Gifts shall not be offered to influence a business relationship and must not violate applicable legal or other requirements as defined in this Code of Conduct. Suppliers shall provide their employees with regular anti-corruption and anti-bribery training to prevent, mitigate and respond to non-compliance.

1.2 Conflict of interest

Suppliers must take the necessary measures to prevent and avoid potential conflicts of interest. Any potential conflicts of interest, including those involving citribel's employees, must be reported to Citribel. The reporting can be done anonymously via our whistleblower portal.

1.3 Fair competition

Suppliers must not engage in any conduct which could undermine or distort fair competition. Suppliers must respect all applicable antitrust laws.

1.4 Confidentiality & data protection

Suppliers are required to protect personal data by maintaining stringent confidentiality and security standards for both personal and business information. Suppliers shall process personal information in compliance with the applicable data privacy laws.

Any confidential information, disclosed by Supplier to Citribel will be maintained strictly confidential, and will be used solely for the purpose of performing its obligations under the existing contract.

2 Sustainable conduct

We have incorporated the Ten Principles of the UN Global Compact (UN GC) into our strategies, policies and procedures. These are all in alignment with our longstanding commitment to contributing to the United Nations' Sustainable Development Goals (UN SDGs) and to our Code of Conduct which are communicated to all our stakeholders.

All our Suppliers have to adhere to the following principles:

2.1 Human Rights

Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights.

Citribel supports and respect human rights by respecting the ETI base codes and by respecting the community:

ETI base code 1: Employment is freely chosen

- There is no forced, bonded or involuntary prison labour.
- The Supplier verifies in advance the legal right to work of all personnel without retaining original identity documents.
- Terms and conditions of employment must be communicated fairly and in writing in advance.
- The Supplier guarantees that employees do not pay any recruitment costs or related costs for their work (Employer Pays Principle). In case of breach, the Supplier is obliged to reimburse any costs paid to the employee.
- Workers are free to leave their employer after reasonable notice.

ETI base code 2: Freedom of association and the right to collective bargaining are respected

- Workers, without distinction, have the right to join or form trade unions of their own choosing and to bargain collectively.
- The employer adopts an open attitude towards the activities of trade unions and their organizational activities.
- 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 employer facilitates, and does not hinder, the development of parallel means for independent and free association and bargaining.

ETI base code 3: Working conditions are safe and hygienic

- 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 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.
- The company observing the code shall assign responsibility for health and safety to a senior management representative.

ETI base code 4: Child labour shall not be used

- Children and young people under 18 shall not be employed.
- Young people under 18 are allowed to do an internship within the company (in accordance with national laws) during office hours only.
- Young people under the age of 18 may not be employed at night or in hazardous conditions.

ETI base code 5: Living wages are paid

- Wages and benefits paid for a standard working week meet, at a minimum, national legal standards or industry benchmark standards, whichever is higher. In any event wages should always be enough to meet basic needs and to provide some discretionary income.
- 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.

ETI base code 6: Working hours are not excessive

- Working hours must comply with national laws and collective agreements
- Working hours, excluding overtime, shall be defined by contract, and shall not exceed 48 hours per week
- All overtime shall be voluntary. Overtime shall be used responsibly, taking into account all the following: the extent, frequency and hours worked by individual workers and the workforce as a whole. It shall not be used to replace regular employment. Overtime shall always be compensated at a premium rate, which is recommended to be not less than 125% of the regular rate of pay.
- The total number of hours worked in any seven-day period shall not exceed 60 hours, except in exceptional circumstances where all the following conditions are met:
 - it is permitted by national law;
 - it is permitted by a collective agreement, freely negotiated with an employee's organization;
 - appropriate safety measures are put in place to protect the health and safety of employees;
 - the employer can demonstrate that exceptional circumstances apply, such as unexpected peaks in production, accidents or emergencies;
 - and employees must be given at least one day off after each seven-day period or, of permitted by national law, two days off in each 14-day period.

ETI base code 7: No discrimination is practiced

- There is no discrimination in hiring, compensation, access to training, promotion, termination or retirement based on race, caste, national origin, religion, age, disability, gender, marital status, sexual orientation, union membership or political affiliation.

ETI base code 8: Regular employment is provided

- To every extent possible work performed must be on the basis of recognized employment relationship established through national law and practice.
- Obligations to employees under labour or social security laws and regulations arising from the regular employment relationship shall not be avoided through the use of labour-only contracting, sub- contracting, or home-working arrangements, or

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through apprenticeship schemes where there is no real intent to impart skills or provide regular employment, nor shall any such obligations be avoided through the excessive use of fixed-term contracts of employment.

ETI base code 9: No harsh or inhumane treatment is allowed

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

Respecting the community:

- by preventing forcible displacement of individuals, groups or communities,
- by working to protect the livelihood of local communities (minimize emissions, nuisance, waste,...).
- by contributing to the public debate: the right and responsibility to express your views on matters that affect your operations, employees, customers and the communities of which you are a part of.

Principle 2: Make sure that they are not complicit in human rights abuse.

Our company complies with all applicable laws and respects internationally recognized human rights. The human right policy is integrated throughout the company via our Code of Conduct and our company policy. All personnel are trained in human rights to ensure consistency so they can respond appropriately when unforeseen situations arise.

We condemn any form of human right abuse, whether

- **Direct complicity** — when a company provides goods or services that it knows will be used to carry out the abuse
- **Beneficial complicity** — when a company benefits from human rights abuse even if it did not positively assist or cause them
- **Silent complicity** — when the company is silent or inactive in the face of systematic or continuous human rights abuse

Suppliers must have a systematic management approach to human rights, including human right due diligence processes. Such processes should identify and prevent or mitigate the human rights risks within its operations and its entire supply chain.

2.2 Labour

Suppliers are required to proactively prevent and eliminate all forms of child labour, forced and compulsory labour, any form of modern slavery, and human trafficking.

Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining (ETI base code 2).

Principle 4: the elimination of all forms of forced and compulsory labour (ETI base code 1).

Principle 5: the effective abolition of child labour (ETI base code 4).

Principle 6: the elimination of discrimination in respect of employment and occupation (ETI base code 7).

2.3 Environment

Suppliers must have an Environmental Management System (EMS) such as ISO 14001 to manage environmental risks, ensure regulatory compliance, and promote sustainability throughout their supply chain.

Suppliers shall have climate protection as a core element of their business strategy. They shall evaluate the impacts and risks that climate change poses to their operations and supply chains and shall adapt to them.

Principle 7: Businesses should support a precautionary approach to environmental challenges.

- Compliance with all applicable environmental laws and permits
- Precaution involves the systematic application of risk assessment, risk management and risk communication. When there is reasonable suspicion of harm, decision-makers need to apply precautions and consider the degree of uncertainty that appears from scientific evaluation.

Principle 8: Undertake initiatives to promote greater environmental responsibility.

This includes (not limitative):

- Define company vision, policies and strategies to include sustainable development, economic prosperity, environmental quality and social equity;
- Develop sustainability targets and indicators (economic, environmental, social);
- Establish a sustainable production and consumption program with clear performance objectives to take the organization beyond compliance in the long-term;
- Improve environmental performance and extend responsibility throughout the value chain;
- Adopt voluntary charters, codes of conduct and practice internally as well as through sectoral and international initiatives to reach responsible environmental performance;
- Suppliers must ensure that their employees are adequately trained on environmental topics;
- Measure, track and communicate progress on incorporating sustainability principles into business practices, including reporting against global operating standards.
- Assess results and apply strategies for continued improvement; and
- Ensure transparency and unbiased dialogue with stakeholders.

Principle 9: Encourage the development and diffusion of environmentally friendly technologies.

- Use of life cycle assessment (LCA) in the development of new technologies and products
- reusing materials on site
- Increase the overall use of renewable energy on a yearly basis. Suppliers shall have management systems in place to continuously improve energy efficiency in their operations.
- Examining investment criteria and the sourcing policy for Suppliers and contractors to ensure that tenders stipulate minimum environmental criteria

We ask our Suppliers to set near-term targets to reduce the greenhouse gas (GHG) emissions caused by their operations (scope 1 and scope 2) or caused in their value chains (scope 3).

Suppliers shall use their best efforts to have a management system in place to reduce water consumption in their own operations. The water use and discharge of wastewater may not

have any negative impacts on the availability and quality of water for the environment and neighboring communities. Suppliers shall use their best efforts to ensure that wastewater effluents pose no hazard to receiving surface and ground waters.

The contamination of soil, air and water shall be avoided. Suppliers shall take actions to minimize any form of pollution. Suppliers shall use their best efforts to ensure the safe and compliant handling, storage, transportation, reuse, recycling and disposal of all types of waste.

3 Anti-Corruption

Principle 10: Businesses should work against corruption in all forms, including extortion and bribery as outlined in this Code of Conduct under Ethics and anti-corruption.

4 Protect biodiversity

Proper waste management (especially for hazardous substances) and water management are essential to protect biodiversity. Suppliers must minimize waste production, prioritize recycling, and have a circular approach to optimize the use of raw materials. Suppliers have to ensure that their operations do not have a negative impact on the environment.

5 Deforestation

Suppliers are expected to protect natural ecosystems from deforestation and forest degradation. Suppliers shall use their best efforts to aim for zero net deforestation.

If the delivery items contain any of the products which are listed in Annex I of Regulation (EU) 2023/1115 on deforestation-free products and these products are placed on the EU market or made available on the EU market within the meaning of Art. 2 of the EUDR, Suppliers shall comply with the EUDR requirements applicable to such products.

6 Quality

Suppliers must deliver products of quality as agreed upon. Suppliers shall immediately contact Citribel in case of major issues that could have a negative impact on the quality and the safety of the goods and services. Suppliers must inform Citribel about changes to the manufacturing or supply process that could have an impact on the quality and safety of goods and services provided.

7 Whistleblower

Citribel takes responsibility to allow stakeholders to speak up on matters of concern across its value chain both inside and outside its organization. We therefore have organized a whistleblowing portal where information, complaints and queries can be issued in a confidential and anonymous way.

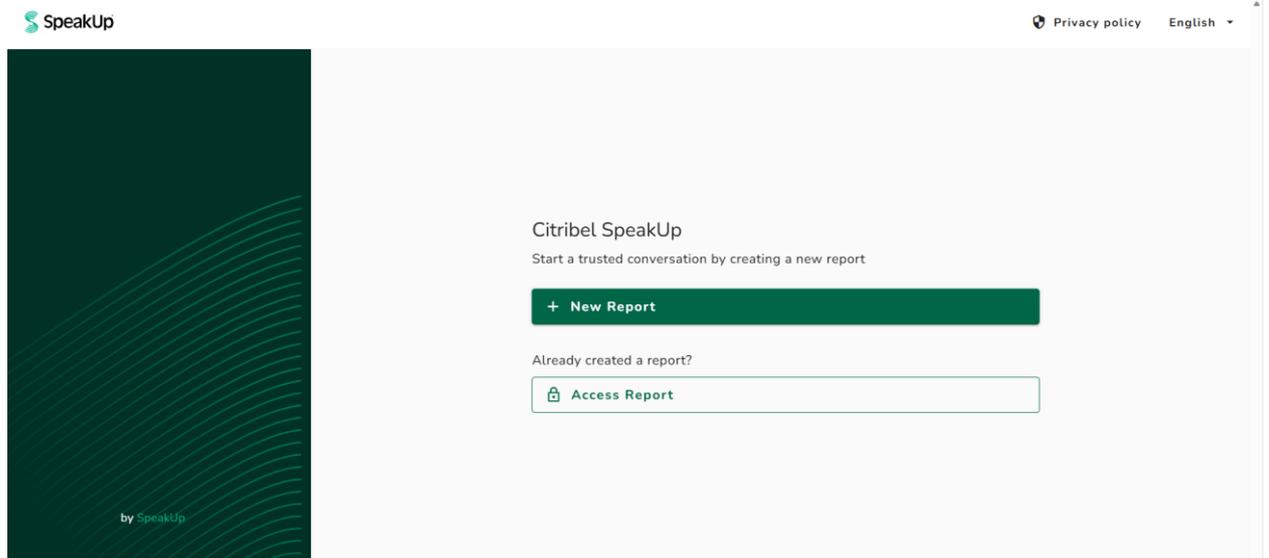
Both employees and non-employees of Citribel have access to this on-line portal.

Any breach to the above-mentioned principles can be reported via our whistleblower portal:

<https://citribel.speakup.report/whistleblowing>

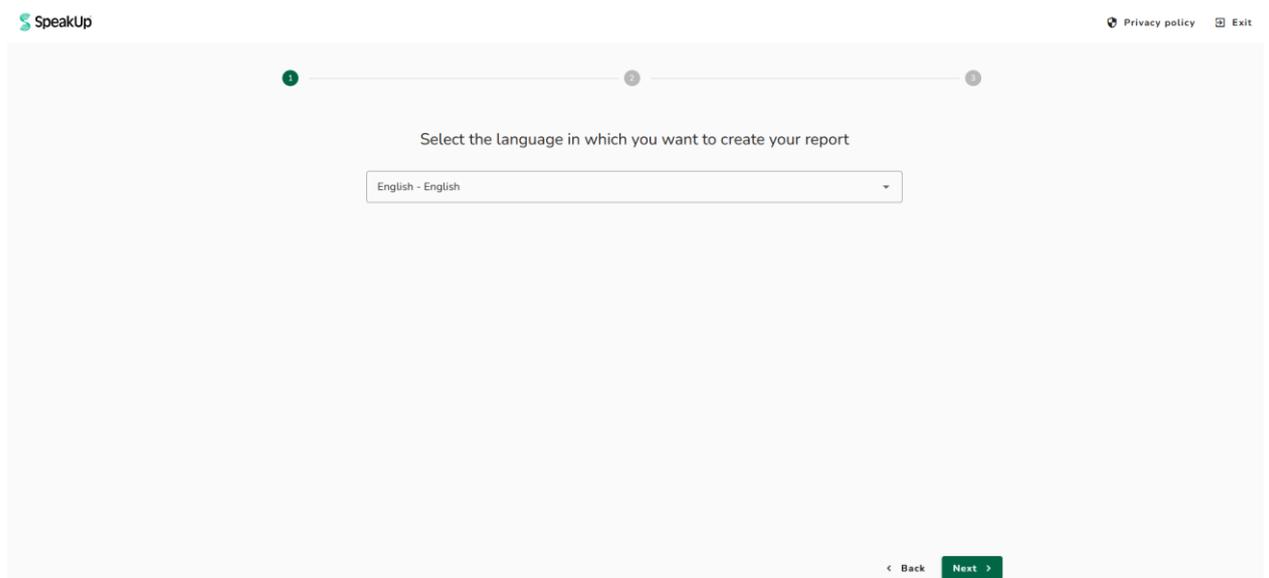
You can report any concern anonymously by following the next steps:

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The screenshot shows the main dashboard of the CitriBEL SpeakUp system. On the left is a dark green sidebar with a wavy pattern and the text "by SpeakUp" at the bottom. The main content area is white and contains the following elements:

- Top left: "SpeakUp" logo.
- Top right: "Privacy policy" and "English" dropdown menu.
- Center: "CitriBEL SpeakUp" heading, followed by the text "Start a trusted conversation by creating a new report".
- Below the text: A prominent green button labeled "+ New Report".
- Below the button: The text "Already created a report?" followed by a white button with a lock icon labeled "Access Report".



The screenshot shows a step in the report creation process. At the top, there is a progress indicator with three steps, where the first step is active. The main content area is white and contains:

- Top left: "SpeakUp" logo.
- Top right: "Privacy policy" and "Exit" icons.
- Center: A heading "Select the language in which you want to create your report" above a dropdown menu currently set to "English - English".
- Bottom right: "Back" and "Next" navigation buttons.

SpeakUp Privacy policy Exit

1 2 3

Report credentials

Save the report number
You will need it later to access your report and see any replies from the organisation.

7411 6874 

Make sure to save this number securely. It can't be recovered.

Create a password
This password, together with your report number ensures that only you can access your report.

Password* 

To keep your report safe and secure

- Minimum 12 characters long
- Minimum one number (0-9)
- Minimum one uppercase letter (A-Z)
- Minimum one lowercase letter (a-z)
- Minimum one special character (!@#5%^&*)

Next >

SpeakUp Privacy policy Exit

1 2 3

Your message

Please include as much detail as possible, such as who was involved, what happened, when and where. You can also attach images or documents to support your message.

You are writing in English

I want to report. |

19 / 50000

Add attachments **Send**