

Delivering meaningful growth

Code of Conduct
for Suppliers

March 2021

GBL

Purpose and scope

This Code of Conduct for Suppliers (the “**Supplier Code**”) sets out the obligations of suppliers of products and services, intermediaries and independent contractors (the “**Supplier**”), as well as their employees and representatives, when dealing with Groupe Bruxelles Lambert or its wholly-owned subsidiaries, Directors, employees and authorised representatives (“**GBL**”).

GBL is committed to acting in the interests of its shareholders, employees and those of the general public. Accordingly, it expects its Suppliers to follow the requirements of its Code of Conduct and Ethics and conduct their business in accordance with the values underpinning this Supplier Code. Moreover, contracts entered into between GBL and its Suppliers may include special requirements that are also dealt with in this Supplier Code. In the event of any discrepancy between the Code and one of these contracts, the contract shall prevail.

1. RESPONSIBLE BUSINESS CONDUCT
2. ETHICAL BUSINESS AND EMPLOYMENT PRACTICES

1. RESPONSIBLE BUSINESS CONDUCT

Compliance with the laws

Suppliers shall always comply with the laws, rules and regulations of the countries in which they operate.

Conflicts of interest

Suppliers shall take all necessary and reasonable precautions to prevent any potential conflict of interest in their dealings with GBL.

Gifts or invitations to events

Gifts or invitations to events offered by an existing or potential Supplier to GBL must not, by virtue of the quality, quantity or timing of the offer, be given with the intention of obtaining an advantage or preferential treatment from GBL or of influencing its decisions. Any gift or invitation to an event must comply with GBL's Code of Conduct and Ethics, be of modest value and be specific, reasonable, legal and compliant with generally accepted ethical standards.

Anti-corruption and anti-bribery

GBL applies a zero tolerance policy to corruption and bribery. Such practices will result in the termination of any current relationship with GBL.

Suppliers shall commit to preventing corruption and bribery, and implement controls to mitigate these risks. Suppliers shall refrain from engaging in conduct that could place GBL in contravention of anti-corruption and anti-bribery laws, including offering, promising, giving, granting, soliciting, demanding or accepting anything of value, directly or indirectly, to or from anyone for the purpose of obtaining or retaining a business advantage or any other beneficial consideration.

Suppliers shall comply with anti-corruption and anti-bribery legislation wherever they conduct their business and notify GBL if they are the subject of any actual or potential investigation involving allegations of practices contrary to this legislation.

Combatting money laundering, terrorism financing and sanctions

Suppliers shall refrain from directly or indirectly participating in activities that contravene anti-money laundering legislation, and from accepting, transferring, converting or concealing funds originating from or linked to criminal or terrorist activities. Suppliers shall comply with all applicable rules on sanctions, laws and regulations.

Data protection

Suppliers shall protect GBL's confidential information and access to GBL systems and networks. They shall also protect personal information obtained in their dealings with GBL, in accordance with applicable laws and GBL policies.

Subcontracting

Suppliers may not assign all or part of their contract with GBL to a subcontractor without GBL's written consent. If consent is given, Suppliers shall ensure that the agreement with the subcontractor complies with their contractual obligations to GBL and this Supplier Code.

Advertising

Suppliers may not advertise their contractual relationship with GBL (whether on their website, social media or otherwise), unless GBL has expressly given its consent to the Supplier.

2. ETHICAL BUSINESS AND EMPLOYMENT PRACTICES

GBL upholds human rights in accordance with the framework established by the United Nations Guiding Principles on Business and Human Rights and requires Suppliers to conduct their business in the spirit of these principles and to adopt policies and practices consistent with them. Suppliers shall therefore not tolerate harassment, discrimination, violence or any other illegal or inappropriate behaviour.

Working conditions

Suppliers shall comply with applicable employment/labour laws and provide wages and rights that meet or exceed the requirements of local laws. Working hours, overtime and number of working days per week may not exceed the applicable legal limits and must be documented transparently and be accessible to employees.

Suppliers shall refrain from using forced, involuntary, compulsory or indentured labour in any of their activities. Suppliers shall comply with laws on forced labour and human trafficking and must not be involved in any related practice (retaining a person's salary or identity documents or restricting their travel).

Suppliers shall refrain from employing anyone who is not of legal working age in the country where they conduct their business. Suppliers shall comply with local legislation and the fundamental principles of the International Labour Organization (ILO) regarding child labour.

Suppliers shall implement policies and procedures to prevent and address discrimination, harassment and violence at work.

Suppliers shall provide a transparent process through which their employees can speak up without fear of retaliation, and which ensures confidentiality and protection for whistle-blowers.

Suppliers shall ensure that their offices and premises comply with occupational health and safety laws. They must establish and maintain good safety practices, in addition to providing employees with the required training and protective equipment to enable them to work in a safe and healthy environment.

Environmental stewardship

Suppliers shall endeavour to conduct their business in an environmentally responsible manner, offering or using green products whenever possible in order to mitigate any negative impact on the environment.

Suppliers shall comply with all applicable environmental laws and regulations in the countries where they operate.

GBL invites Suppliers to monitor their greenhouse gas emissions and reduce them, for example by establishing targets for reduction, launching projects to improve operational efficiency and technologies, and by offering them low-carbon products and services.

GBL encourages Suppliers to undertake initiatives to promote greater environmental responsibility, such as adopting policies and programs to reduce waste and consumption of water, energy and paper.

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If a Supplier deviates from this Supplier Code, corrective action must be taken as soon as possible. Any major deviation may result in the termination of the relationship between the Supplier and GBL in accordance with the applicable agreement between the two parties.



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