

Supplier Code of Conduct IPCOM Group

This policy was issued on 6 April 2023; last update: 5 June 2025

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1 Introduction

At IPCOM Group (“IPCOM”), we are committed to conducting our business with integrity, fairness, and respect for people and the planet. We believe that our suppliers and business partners play a critical role in helping us achieve these standards.

This Supplier Code of Conduct (“the Code”) establishes the minimum requirements and ethical, social, and environmental expectations that IPCOM has for its suppliers, their affiliates, subcontractors and business partners (collectively referred to as “Suppliers”) in all aspects of their operations.

Our goal is to foster responsible business practices across our supply chain and ensure compliance with applicable laws and regulations. By adhering to this Code, suppliers help us maintain a culture of trust and accountability while advancing sustainable growth and positive impact in the communities where we operate.

We expect all suppliers to review, understand, and align their operations with the principles outlined in this document. Together, we can build partnerships that are not only successful in business terms but also contribute to a more ethical, inclusive, and sustainable future.

2 Purpose

The purpose of this Code is to ensure that all Suppliers adhere to responsible business practices in key areas such as labour and human rights, environmental responsibility, and ethical conduct, including anti-corruption and anti-bribery compliance. By adhering to this Code, suppliers contribute to the delivery of products and services that are produced in a socially responsible and sustainable manner, building a resilient supply chain that creates value for all stakeholders.

3 Scope

This Code applies to all Suppliers, including companies, individuals, or any other business partners that provide goods and/or services to IPCOM, regardless of location. Suppliers are also expected to communicate and enforce these standards with their own supply chains, including subcontractors and sub-suppliers.

4 Compliance Requirements

Suppliers must comply with all applicable local, national, and international laws and regulations in the jurisdictions where they operate. Where this Code sets higher standards than applicable laws, IPCOM expects Suppliers to adhere to the principles set forth herein.

5 Labour and Human Rights

5.1 International standards

Our organization expects all suppliers to uphold the highest standards of labour and human rights in line with internationally recognized principles, including the UN Guiding Principles on Business and Human Rights and the International Labour Organization (ILO) core conventions.

5.2 Forced labour

Suppliers must prohibit forced, child, or exploitative labour and respect freedom of association and other internationally recognized labour and human rights.

Suppliers must ensure that no goods associated with forced labour are present at any stage of their production or supply chains. IPCOM expects all suppliers to uphold international labour standards and fully comply with the EU Forced Labour Regulation, which prohibits the placing on the market or export of products made, in whole or in part, using forced labour.

5.3 Fair wages

IPCOM believes that fair wages and benefits are essential to ensuring the well-being and dignity of workers, as well as to supporting a sustainable and ethical supply chain. We expect our suppliers to comply with all applicable laws and regulations related to wages and benefits, and to provide their employees with fair and competitive compensation packages.

Our suppliers shall pay all employees at least the minimum wage required by applicable laws and regulations and provide all legally mandated benefits.

5.4 Health and safety working conditions

We expect all our suppliers to take full responsibility for maintaining the highest standards of health and safety within their operations. This includes ensuring safe working conditions, implementing effective risk management practices, and complying with all relevant laws, regulations, and industry standards.

Suppliers should actively promote a culture of safety, provide adequate training and protective equipment to employees, and continuously monitor and improve workplace health and safety measures. By prioritizing the wellbeing of their workforce and the communities they impact, suppliers contribute to a responsible, sustainable, and ethical supply chain.

5.5 Diversity and inclusion

We expect all suppliers to actively promote diversity and inclusion within their organizations and supply chains. This includes ensuring fair and transparent employment practices, avoiding any form of discrimination - based on gender, ethnicity, age, disability, religion, sexual orientation or other protected characteristics - and fostering inclusive and respectful workplaces, where employees feel safe and empowered to contribute.

5.6 Learning and development

Within IPCOM, continuous learning and development are key to ensuring a skilled and engaged workforce, as well as to promoting long-term business success. We also expect our suppliers to invest in the ongoing training and development of their employees, and to provide opportunities for career growth and advancement.

5.7 Social return

We expect our suppliers to contribute to social return by creating opportunities for people with barriers to employment, such as through training, apprenticeships, or inclusive hiring. and by engaging in community initiatives that generate positive social impact. We encourage our suppliers to integrate social return objectives into their business practices and supply chains, and to collaborate with us in measuring and reporting on the social value they deliver.

6 Environment

6.1 Environmental responsibility

We expect all our suppliers to demonstrate a strong commitment to environmental responsibility by actively minimizing their ecological impact throughout their operations. This includes efficient resource use, reducing waste, conserving energy and water, lowering greenhouse gas emissions, reducing pollution and the use of hazardous chemicals, protecting biodiversity, and ensuring compliance with all relevant environmental laws and regulations.

We also encourage suppliers to innovate and implement eco-friendly solutions that promote long-term sustainability and protect natural resources for future generations.

6.2 Climate change

As a provider of insulation solutions, we help our customers reduce emissions and improve energy efficiency — but our commitment goes beyond the products we deliver. We are determined to reduce our own carbon footprint and have joined the Science Based Targets initiative (SBTi) to ensure that our actions align with globally recognized pathways for limiting climate change. All companies within our group are actively undertaking measures to lower their environmental impact, because reducing CO₂ emissions is a shared responsibility — one we must all embrace today, rather than pass on to society and future generations.

We expect our suppliers to take responsibility for climate change by reducing emissions, improving energy efficiency, and committing to Science Based Targets initiative (SBTi) goals. Through sustainable practices and measurable climate action, suppliers play a vital role in supporting a low-carbon future and building long-term resilience.

6.3 Ecodesign and circular economy

We expect our suppliers to actively integrate principles of ecodesign and circular economy into their products, services, and operations. This includes designing solutions with resource efficiency, durability, repairability, recyclability, and safe material use in mind, while minimizing waste throughout

the product life cycle. Suppliers should strive to reduce dependency on virgin raw materials, promote the use of recycled or renewable inputs where feasible, and support closed-loop systems that keep materials in use for as long as possible. Collaboration and innovation in this area are essential, and we encourage suppliers to share ideas, practices, and improvements that contribute to reducing environmental impact and advancing a more sustainable value chain.

6.4 Deforestation-Free Sourcing

Suppliers of relevant commodities and their derivatives (including timber, rubber, palm oil, soy, cattle, coffee and cocoa) must comply with all applicable laws and regulations on deforestation-free sourcing and traceability in the jurisdictions where they operate and where IPCOM products are placed on the market. This includes (but is not limited to) the EU Deforestation Regulation or any successor or equivalent regulation.

Suppliers shall:

- Ensure that products supplied to IPCOM are not linked to deforestation or forest degradation, in line with applicable legal requirements;
- Be able to provide sufficient and credible information on the origin of products to demonstrate compliance with these requirements;
- Have a process to assess and manage deforestation-related risks in their own supply chains;
- Keep and share supporting records when required by law or upon IPCOM's reasonable request.

7 Business ethics

7.1 Ethical business conduct

We expect all suppliers to uphold the highest standards of ethical business conduct in their operations and supply chains. This includes acting with integrity, transparency, and accountability in all business dealings, complying with all applicable laws and regulations, and actively working to prevent corruption, bribery, fraud, and conflicts of interest.

We expect suppliers to establish effective governance systems to monitor, manage, and continuously improve their ethical performance and to operate transparently, providing clear and accurate information about their business practices, sourcing, and supply chains, in alignment with the requirements of the Corporate Sustainability Reporting Directive (CSRD).

7.2 Anti-bribery and anti-corruption

Our suppliers will adhere to all applicable local laws and international anti-corruption conventions, and refrain from engaging in any form of corrupt practices. The supplier in no case should offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party.

IPCOM and its suppliers may only offer or accept gifts or hospitality when these are reasonable, proportionate, and appropriate to the circumstances. Under no circumstances should gifts, hospitality, or other benefits be given or received with the intent — or potential effect — of securing an improper

advantage or unduly influencing a business decision. All such exchanges arising in a business context must strictly comply with IPCOM's Compliance, Integrity, Anti-Fraud, and Anti-Corruption Policy.

7.3 Anti-money laundering

IPCOM's suppliers must comply with all applicable laws and regulations regarding money laundering and must not acquire, use, convert, conceal, or possess the proceeds of crime or help another person to do so. The suppliers need to take steps to prevent the use of their products or services for illicit purposes.

7.4 Fair competition

At IPCOM, we believe in fostering a competitive marketplace that promotes fair and ethical business practices. The suppliers are required to compete ethically and must act in compliance with all anti-trust and competition laws applicable to their business.

We will not tolerate any form of unethical or anti-competitive behaviour from our suppliers.

7.5 Security, risk management, data governance

We expect our suppliers to take full responsibility in the areas of security, risk management, and data governance by implementing robust measures that protect information assets, ensure compliance with applicable regulations, and safeguard against potential threats or disruptions.

Suppliers must proactively identify, assess, and mitigate risks within their operations, maintain strong governance frameworks for handling data, and uphold the highest standards of confidentiality, integrity, and availability. By doing so, they not only protect their own operations but also contribute to the resilience, trust, and long-term success of our shared business ecosystem.

7.6 Transparency

We expect our suppliers to actively participate in sustainable procurement audits, whether through self-assessments, the provision of supporting documentation, or onsite evaluations when requested. These audits are an important tool to ensure transparency, monitor compliance with our standards, and identify opportunities for continuous improvement. Full cooperation, timely responses, and accurate information are essential, as they help us work together towards a more responsible, ethical, and sustainable supply chain.

7.7 Whistle-blower protection

As part of our commitment to ensure a safe and respectful workplace, we require that suppliers establish an effective mechanism for employees to report workplace complaints and violations, in compliance with all relevant local laws and regulations. In particular, the supplier must ensure that whistle-blowers are protected from retaliation, and that their identities and complaints are kept confidential.

8 Supply chain responsibility

IPCOM acknowledges that global supply chains can be complex and sometimes linked to risks such as poor working conditions, human rights violations, and environmental harm.

We therefore expect our suppliers to take full responsibility for their supply chains by actively identifying, preventing, and addressing such risks and negative impacts. This includes respecting international human rights and environmental standards, applying fair trade principles, and practicing due diligence in line with regulations such as the Corporate Sustainability Due Diligence Directive (CSDDD). Suppliers are required to implement robust due diligence processes within their own supply chains to identify, prevent, and address sustainability risks, including deforestation and forest degradation, as defined under the EU Deforestation Regulation, and forced labour, as defined under the EU Forced Labour Regulation.

By promoting transparency, accountability, and responsible practices across every stage of the supply chain, IPCOM strives to protect people, nature, and the environment while contributing to a fair and sustainable global economy.

9 IPCOM requires compliance with the supplier code of conduct

To ensure ethical practices and standards are upheld, IPCOM requires its suppliers to comply with its Supplier Code of Conduct. Suppliers are responsible for creating and maintaining a process that enforces this Code.

Suppliers must also commit to complete a Supplier Self-Assessment questionnaire and to provide supporting documentation where required.

10 Signature

This Supplier Code of Conduct may be updated by IPCOM from time to time. All references herein to the IPCOM Supplier Code of Conduct refer to the most current version of this Supplier Code of Conduct, available at <https://www.ipcom.be/>.

Supplier confirms by signature below that Supplier complies with the IPCOM Supplier Code of Conduct:

Supplier Name:

Representative Name and Position:

Date and Signature: