



Policy	
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Supplier Code of Conduct	

Supplier Code of Conduct

(version: Jul 22, 2025 (UTC))

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1. PURPOSE

This Supplier Code of Conduct ("Supplier Code") establishes the ethical principles, considerations, and standards of conduct for entities or individuals ("Supplier") that provide services or carry out activities for the QbD Group (hereinafter "QbD Group") or on behalf of any of the companies that comprise it.

QbD Group does not approve of illegal or unethical behaviour by its Supplier, contractors, and partners; it selects its Supplier through a fair procurement process. This Code of Conduct details the minimum required standards and complements the terms and conditions of contracts between Supplier and QbD Group. This Code does not exempt the Supplier from financial responsibility, exercising good practices, or seeking guidance related to business conduct.


2. SCOPE

This Code of Conduct is valid for all Supplier.

The term Supplier also includes independent contractors and subcontractors who provide services for or on behalf of QbD Group.

3. DEFINITIONS & ACRONYMS

- **International Bill of Human Rights** - the International Bill of Human Rights is a collective term for three foundational documents that form the core of international human rights law. These documents were adopted by the United Nations and together set out the basic civil, political, economic, social, and cultural rights that all human beings are entitled to.
 - The Universal Declaration of Human Rights (UDHR) – Adopted in 1948
 - ♦ A landmark document that sets out fundamental human rights to be universally protected.
 - ♦ While not legally binding, it has become a cornerstone of customary international law.
 - Key rights include: right to life, freedom from torture, freedom of expression, right to education, and equality before the law.
 - ♦ The **International Covenant on Civil and Political Rights (ICCPR)** – *Adopted in 1966, entered into force in 1976*

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A legally binding treaty that elaborates civil and political rights, such as:

- Right to life and liberty
- Freedom of speech and religion
- Right to a fair trial
- Freedom from torture and arbitrary detention
- ◆ The International Covenant on Economic, Social and Cultural Rights (ICESCR) – *Adopted in 1966, entered into force in 1976*

A legally binding treaty that guarantees rights such as:

- Right to work and fair wages
- Right to education
- Right to health
- Right to social security and an adequate standard of living

4. POLICY


Supplier, although independent organizations, actively participate in QbD Group's value chain. For this reason, QbD Group will promote and encourage awareness of its Code of Conduct among Supplier and the adoption of consistent behavioural guidelines.

This Code, marked by an ideal of cooperation, aims for mutual benefit while respecting each party's role at all times. QbD Group considers that its Supplier must maintain the minimum conduct guidelines listed below for the proper development of their activities.

4.1. Applicable Legislation

QbD Group's Suppliers must comply with applicable international, European Union, and/or local legislations of the countries where they operate, avoiding any conduct that, even if not illegal, could harm QbD Group's reputation or produce adverse consequences for the company or its environment.

When facing conflicting requirements, Supplier must seek alternatives that respect internationally recognized laws.

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4.2. Human Rights

QbD Group's Supplier must respect internationally recognized human rights as outlined in the "International Bill of Human Rights" and principles included in the eight Fundamental Conventions of the International Labour Organization (ILO), according to the Declaration on Fundamental Principles and Rights at Work.

The responsibility to respect human rights require Suppliers to avoid causing or contributing to adverse human rights impacts through their activities, address such impacts when they occur, and seek to prevent or mitigate adverse human rights impacts directly linked to products or services provided by their Supplier.

Non-exhaustively, this responsibility implies:

- Supplier must maintain labour practices consistent with international norms with their employees.
- Supplier must provide a workplace characterized by professionalism and respect for the dignity of every collaborator/worker and every person their collaborators interact with; treat all workers with dignity and respect; refrain from any humiliating conduct or discrimination based on race, religion, politics, union affiliation, nationality, language, sex, marital status, age, or disability; not tolerate discrimination; foster a culture and workplace promoting equal opportunities; and not tolerate harassment, threats, or retaliation for reporting harassment.
- Supplier must not participate in or support human trafficking and modern slavery, nor use forced or involuntary labour, or require work or services under threat or coercion.
- Suppliers must not engage in or support the use of child labour in any part of their operations or supply chains. The minimum age for employment shall be in accordance with:
 - International Labour Organization (ILO) Convention No. 138 on the Minimum Age,
 - ILO Convention No. 182 on the Worst Forms of Child Labour,
 - As well as applicable EU and Belgian labour laws, which generally prohibit employment under the age of 15 or the age of completion of compulsory schooling, whichever is higher.
- Supplier must respect workers' rights to freedom of association and not prevent legal organization or union membership.

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- Supplier must conduct job-relevant background checks in line with applicable privacy regulations to ensure worker integrity and good reputation, evaluating candidates and workers based on their ability to perform the job.
- Ensure that working conditions and environment (including wages, working hours, maternity protection, promotion of a safe work environment free of alcohol and drugs, etc.) comply with applicable international labour standards and promote and maintain the highest level of physical, mental, and social well-being of employees.

4.3. Supplier Diversity

Wherever practicable, Suppliers shall promote diversity and inclusion by actively employing and supporting individuals from underrepresented groups—such as women, indigenous peoples, racial or ethnic minorities, and members of the LGBTQ+ community—and by integrating businesses owned or operated by these groups into their supply chains.

4.4. Health, Safety and Environment


In addition to meeting minimum legal and regulatory requirements for working conditions, Supplier must provide a safe and healthy work environment and comply with applicable local and international health and safety laws.

When activities occur at QbD Group's facilities, the Supplier must know and ensure that its employees and subcontractors comply with all applicable Health, Safety, and Environmental standards of the QbD Group.

The Supplier will comply with all applicable environmental laws and proactively minimize adverse environmental impacts, complying with applicable legislation in each country of operation, and achieving a high level of safety in their facilities, products, and services, paying special attention to protecting their employees, contractors, clients, and local environment. The Supplier is encouraged to adopt sustainable practices, including but not limited to:

- Reducing energy consumption and greenhouse gas (GHG) emissions.
- Implementing waste reduction, recycling, and responsible waste management.
- Protecting biodiversity and natural habitats.
- Promoting resource efficiency and sustainable sourcing where possible.

These measures are expected even if not directly related to the contract subject matter, to align with QbD Group's commitment to sustainability.

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4.5. Ethical Behaviour and Measures Against Bribery and Corruption

Supplier must not engage in illegal or unethical conduct and are expected to maintain fair business practices. They must also provide mechanisms that enable their employees and contractors to report unethical behaviour incidents.


Supplier must act honestly and with integrity in all dealings with public or private entities in any country where they operate.

Corruption, Supplier must establish mechanisms to combat all forms of corruption and bribery, including but not limited to:

- Not directly or indirectly making or offering any cash payment, in-kind benefit, or other advantage to any person or entity serving any authority, public or private entity, political party, or candidate for public office, to unlawfully obtain or retain business or other advantages.
- Not directly or indirectly making or offering any payment or benefit to anyone to abuse their real or apparent influence to obtain any business or advantage from any authority or entity.
- Not directly or indirectly making or offering any payment or benefit when aware that part or all of the money or benefit will be given to any authority, public or private entity, political party, or candidate for public office for the purposes described above.
- Not making facilitation payments or expediting payments of any amount in exchange for securing or speeding up any judicial or administrative process.
- Specifically, Supplier must not make or accept payments or benefits in connection with contracting with QbD Group to obtain or maintain business or advantage that could cause a conflict of interest between the Supplier or third party and QbD Group.
- Supplier must make reasonable efforts to prevent bribery offenses and support anti-corruption efforts.

Gifts and Entertainment, the Supplier must not offer, accept, or solicit gifts, entertainment, or hospitality that could be a subterfuge for bribery or improperly influence decisions or business objectivity.

Money Laundering and Sanctions, the Supplier must not participate in activities or business that could involve QbD Group directly or indirectly in money laundering or terrorist financing. Supplier must comply with applicable laws, commercial control regulations in import/export and transfer of goods and services.

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Insider Information, the Supplier must not trade or speculate with confidential, non-public insider information obtained from their relations with QbD Group.

Conflicts of Interest, the Supplier must not allow biases, conflicts of interest, or improper third-party influences to override their professional judgment and responsibilities. They must not conduct transactions that create conflicts of interest regarding the supply of goods or services and must immediately inform QbD Group of any potential conflicts of interest related to business with QbD Group.

4.6. Social Media

Supplier must not act or speak on behalf of QbD Group, represent themselves as QbD Group, or express any views attributable to QbD Group unless expressly authorized.

4.7. Interpretation

The provisions of this Code of Conduct shall be applied and interpreted considering the context, historical and legislative background, and the social reality of the time of application, in line with the spirit and purpose of the provisions.

In case of conflict between this Supplier Code and the Supplier's contract with QbD Group, the contract shall prevail to the extent legally permitted.


4.8. Information Security, Privacy, and Confidentiality

The Supplier must take necessary measures at all times to properly protect, collect, and manage confidential and personal information, including physical and electronic assets obtained from QbD Group or its clients. This information must be used strictly for the purpose it was provided. The Supplier must immediately inform QbD Group of any incident involving unauthorized access, disclosure, or potential loss of such information to security@qbdgroup.com.

4.9. Supplier Responsibilities

The Supplier commits to:

- Adhering to this Supplier Code of Conduct throughout their engagement with the QbD Group.
- Cooperating with audits or assessments related to this Supplier Code of Conduct.

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- Implementing corrective & preventive actions if issues and/or opportunities for improvement related to this Supplier Code of Conduct are identified.
- Reporting any violations or concerns related to this Code promptly via QbD's Compliance Communication Channel: quality@qbdgroup.com.

4.10. Violations and Non-compliance

Violations of the Supplier Code of Conduct are taken seriously and must be reported as soon as the Supplier becomes aware. Supplier shall report any potential violations or breaches of this Supplier Code of Conduct via email to: quality@qbdgroup.com

Non-compliance by the Supplier may have consequences on the contractual relationship with QbD Group. In case of any violation, recommendations or corrective action plans may be required, and sanctions may range from warnings to disqualification as a QbD Group Supplier, without prejudice to other applicable legal or administrative actions.

5. HISTORY

Version	Implementation date	Principal changes	Author
1.0	Jul 22, 2025 15:11:24 (UTC)	This is the initial version.	Delphine Rogge

6. APPROVAL

Role	Name & Title	Digitally Signed
Department Approval	Delphine Rogge	Jul 22, 2025 13:07:12 (UTC)
Quality	Anneke Lenaerts	Jul 22, 2025 15:11:16 (UTC)