



Code of Conduct for Suppliers





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STATEMENT OF INTENT

Integrity and social responsibility are essential to do business in a complex world. A business cannot grow without a sustainable bond of trust with its stakeholders.

In its Company Code, Indaver aims to be transparent about its mission and core values and about how it fulfils them. It clarifies what we expect of our stakeholders and how we translate our core values into daily business.

Indaver also set up this Code of Conduct, which is a set of principles to clarify to all suppliers/business relations involved what they can expect from Indaver and, conversely, what we expect of them.

Our mission:

Leading the field in sustainable waste management

Our core values:



Demonstrating concern for people, safety and the environment



Building relationships based on mutual trust



Transparency in communications and actions



Concentrating on achieving results



Continuously improving

Dear Supplier,

Indaver has a Sustainable Procurement Charter and a Code of Conduct for Suppliers in order to reflect our commitment to sustainable development and to do business with partners which have made such a commitment or are in the process of doing so.

We are committed to work with our partners to promote responsible practices in general and throughout our supply chain. Our aspiration is to ensure that all our partners acknowledge our values and share our commitment to conduct business in an ethical, legal and socially responsible manner. We strive to continually improve within the areas of human rights, labour standards and the environment and to work against any form of corruption.

We strongly believe that a 'Code of Conduct' towards our suppliers and in our supply chain is a step to establish a long term sustainable relationship with our partners, our employees and the societies in which we operate.

The Indaver Supplier Code of Conduct reflects our commitment to the principles of corporate social responsibility (CSR) as defined in the EU Commission Communication (COM/2011/0681 final) and follows internationally recognised principles and guidelines, in particular the OECD Guidelines for Multinational Enterprises, the UN's Sustainable Development Goals (SDGs), the ten principles of the United Nations Global Compact, the ISO 26000 Guidance Standard on Social Responsibility, the International Labour Organisation (ILO) Tri-partite Declaration of Principles Concerning Multinational Enterprises and Social Policy, and the United Nations Guiding Principles on Business and Human Rights.

Our Code of Conduct is addressed to suppliers, subcontractors and business relations. For simplification purposes the term "supplier" is used for both.

Scope

Indaver requests its suppliers to share the principles which are expressed in the Supplier Code of Conduct. We have a strong preference for those suppliers who strive for sustainable development and who are able to demonstrate engagement and commitment to our Code of Conduct. Moreover, we invite our suppliers to translate these principles further down the supply chain.

This Supplier Code of Conduct is therefore made available to our suppliers with the goal of strengthening our mutual understanding of how sustainability should be practiced in day-to-day business.

We look forward to doing business with you!

Paul De Bruycker,
CEO





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CODE OF CONDUCT FOR SUPPLIERS

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Indaver believes that the success of a company depends upon a relation of trust and professionalism with its main stakeholders.

Your commitment to Indaver

Indaver is bound to act objectively and impartially in the interest of the company and its customers. We operate within a framework of principles and rules, described in the Indaver Company Code, Local Work Regulations Policies, and the individual employee contracts, that govern our conduct regarding ethics and integrity.

Main purpose of Code of Conduct

This Code of Conduct for suppliers is fundamental in creating and maintaining the relation of trust. Its main purpose is to ensure that all Indaver suppliers perform their activities ethically and in accordance with laws, regulations and the standards Indaver sets through its policies, guidelines and rules.

This Code of Conduct provides a framework for responsible conduct when working with Indaver. Indaver suppliers should always strive to exercise good judgement, care and consideration in their daily work.

Sustainable development

Indaver believes a company should play a significant and beneficial role within the community and society in general.

Since its foundation Indaver strives to make a positive and balanced ecologic/economic contribution wherever it conducts business. Our philosophy is that the community is an important stakeholder in business.

We expect our suppliers to conduct fair business practices thanks to responsible management systems and contribute positively to human rights & labour, health & safety, the environment and local engagement in communities and the society in general.

Sustainable Procurement management

To minimise the risks within Indaver's supply chain, Indaver developed a sustainable procurement management and translated this approach into its own organisation on the one hand and to its suppliers via a Code of Conduct for Suppliers.

Indaver recognizes that there are differences in the supplier base in terms of their scale, scope and operations. Indaver will take into account that compliance with the principles of our Code of Conduct for Suppliers may result in different practices across our range of suppliers.

Some demands are strictly required, others are principles which we encourage our suppliers to comply with. The latter can be interpreted as inspiration to further translate them into their supply chain.

Periodical review of our Policies

We will periodically review the policy to ensure that it continues to meet our corporate social responsibility targets.

Changes to our Sustainable Procurement Charter and Code of Conduct will be communicated effectively to suppliers.

With every signed contract and placed order, our suppliers are required to be compliant with our Code of Conduct.



Ethics in Fair Business Practices

To meet Indaver's social responsibilities, we place high ethical requirements, which we already apply in-house, on our suppliers and partners. Suppliers are expected to endorse these requirements as this is the basis for our sustainable relationship with them. This is the only way we can maintain our integrity and remain worthy of the trust of all our stakeholders.

Ethical requirements include the following aspects:

No bribery / no corruption

Corruption is the abuse of entrusted power for private gain. Corruption can be classified as grand, petty or political, depending on the amounts of money involved and the sector where it occurs.

Suppliers will comply with applicable anti-corruption legislation and all other local or otherwise applicable laws, included those dealing with the bribery of government officials.

Suppliers are encouraged to adopt a written and formal anti-corruption programme as an expression of their core values of integrity and responsibility as well as to counteract corruption effectively.

Conflict of Interest

Suppliers are transparent and do not take advantage of any family, social or political connections to gain advantage within business dealings. Suppliers will thus avoid any interaction with an Indaver employee that may conflict, or appear to conflict, with that employee acting in the best interests of Indaver.

Gifts & Donations

Under no circumstances inappropriate benefits or gifts may be accepted or offered that go beyond the bounds of business hospitality or that compromise integrity or independence, or create the impression of doing so.

Suppliers are encouraged to fight bribery and corruption, to prohibit any form of passive or active bribery or otherwise offer or receive any incentive that is intended to gain any business advantage.

Fair Competition

Suppliers will comply with all applicable laws regarding fair competition and antitrust. They are expected not to enter into business arrangements that distort, eliminate or discourage competition, or that provide improper competitive advantages.

Suppliers will only supply products/services that meet specifications and are competitive.

Corruption has a negative impact on communities and overall global economic development.



Suppliers are not allowed to contact competitors to discuss pricing, costs or terms of conditions of sale. Nor to unfair restrict trade or exclude competitors from the marketplace, nor make agreements with competitors regarding allocating markets or customers, nor boycott customers or competitors.

Suppliers are encouraged to conduct their business with integrity and transparency and make every effort to encourage compliance with the code of conduct by their own suppliers.

Privacy & Intellectual Property

Suppliers will protect Indaver's confidential information, including personal information, and act to prevent its misuse, theft, fraud or improper disclosure and will comply with all applicable data privacy laws. Suppliers must take all due care in handling, discussing or transmitting sensitive or confidential information that could affect Indaver, its employees, its customers, the business community or the general public.

*Fair competition
is a driver
for innovation*

Responsible marketing

Indaver is committed to integrity in its marketing practices. All of Indaver's efforts are geared towards convincing customers and prospects of doing the right thing in terms of sustainable waste management.

Suppliers are encouraged to conduct responsible marketing efforts. All promotional materials, reporting and communications must be accurate, not misleading and compliant with all legal and regulatory standards. Suppliers will not engage in illegal or unfair activities such as false or misleading advertising or unfair comments about competitors' services.

Human rights

Respect for people is a core Indaver Value. As a company we endorse the UN's Declaration of Human Rights, therefore we adhere to these principles and expect our suppliers to respect the human rights of their employees and treat them fairly, in accordance with all applicable laws. Suppliers should share the belief that respect for human rights is in the interest of everyone – individuals, companies and ultimately society as a whole.

Equal Opportunity and Non-Discrimination

Indaver strives to workplace integrity. Suppliers should respect the distinctions of our individuality without regard to race, ethnicity, religion, national origin, gender, sexual orientation, disability, age, family status, union or political affiliation, no sexual harassment, or any other basis. Unlawful discrimination will not be tolerated.

Suppliers will ensure that their employees are not harassed in any way. Equal treatment of all employees will be a fundamental principle of supplier's corporate policy.



Fair Treatment

Indaver strives to maintain a positive work environment in which people are treated with dignity, decency and mutual respect. That environment should be characterized by mutual trust and the absence of intimidation, oppression and exploitation.

Suppliers personnel should work and learn in a safe and stimulating atmosphere. The accomplishment of this goal is essential to Indaver's mission.

Suppliers should share the belief that respect for human rights is in the interest of everyone – individuals, companies and ultimately society as a whole.

No Child Labour

Indaver does not tolerate child labour in its supply chain.

Suppliers will comply with all applicable child labour laws and conduct their business in conformity with the ILO's (International Labour Organization) core labour standards and the United Nations Global Compact principles.

Child labour is a serious human rights issue. Working children not only lose their access to education, they are also negatively impacted in terms of their physical and psychological growth.

No Forced (Slavery) and Compulsory Labour

Using forced labour is considered a violation of human rights. Suppliers will not use nor contribute or link to forced or involuntary labour, bonded labour or slave labour.

No Harassment and Abuse of Labour

Suppliers will ensure that their employees are not subjected to psychological, verbal, sexual or physical harassment or any other form of abuse, and will comply with all applicable laws on harassment and abuse of employees.

*Human rights
defence help to
ensure that we
are all treated
fairly, and with
dignity, equality
and respect.*



Labour

Engaging people with disabilities

Indaver strives to involve people with disabilities, if the type of activities allow it.

Suppliers are encouraged to involve people with disabilities and foresee in necessary adaptations in the working environment or tasks.

Appropriate Work Hours, Wages & Compensation

Suppliers will comply with all applicable laws on work hours and overtime, as well as all applicable laws on wages and benefits. Employee compensation meets at least the legal minimums including overtime and are in line with industry standards. Suppliers pay wages at regular intervals.

Respect Freedom of Association and Collective Bargaining

Indaver respects the right to form and join trade unions and bargain collectively.

Suppliers will be committed to an open and constructive dialogue with their employees and workers' representatives.

Open communication

Indaver believes in transparency in communications and actions since it is one of our core values. We believe it to be a basis for a sustainable relationship of trust.

Suppliers ensure that employees can freely communicate with their superiors concerning their working conditions.

Training & education

Indaver has established plans and takes its responsibility in terms of safety and compliance in that matter.

Suppliers are expected to create awareness with their employees and to give them the necessary training to increase safety, safeguard the environment and ensure compliance with regulations. They must have (environmentally) safe procedures for waste handling, storage, treatment and transport and they must monitor the environmental and energy performance of the products and services they offer.

Suppliers shall organize training programs that provide management and workers with the knowledge and skills needed to address the expectations set forth in this document. Suppliers will also ensure that management and workers have the necessary qualifications, resources and authority to meet these expectations.

Housing standards

Suppliers that provide housing or living accommodation for workers will ensure that local housing and safety standards are met.

*Defending
Labour Rights
increases
productivity, self
development,
inventions and
much more*



Health & Safety

A common goal

Both Indaver and its suppliers ensure in all their operations, products and services to protect the health of, and minimise risks to, the safety of all persons – employees, subcontractors and other individuals including users and the community.

Health & Safety in the Workplace

Prevention

Occupational health and safety is a field that aims to understand and control the causes of accidents and illnesses at work to promote and maintain the highest degree of physical, mental, and social well-being amongst workers.

Respecting human rights obligates all employers, through conventions and legislation, to prevent work-related injuries and fatalities. Having an effective health and safety management system to mitigate the risks of occupational illnesses and accidents, companies will be able to:

1. reduce lost time incidents,
2. improve employee morale and productivity,
3. reduce medical costs and workers' compensation costs, and
4. comply with national legislation.

Monitoring & training

Suppliers are expected to contribute to the safety of the workplace by being alert and aware of the rules, policies and procedures and by reporting any unsafe condition. Material safety data sheets containing all necessary safety-relevant information will be made available by suppliers for all hazardous substances and will be provided to Indaver and other parties in case of a legitimate need.

Suppliers will provide a safe and healthy workplace for their employees, including appropriate controls, training, work procedures, personal protective equipment and access to bathrooms and potable water.

Certification

Suppliers are expected to adopt suitable and robust management practices for Health & Safety. Suppliers who have management systems accredited to ISO45001 or equivalent will be deemed to satisfy this requirement.

In addition to the requirements detailed here, all personnel working on Indaver sites must operate under the Health & Safety requirements of that site, even if these differ from the practices of suppliers' company. In some cases, this will require further certification.

*With safety, we all
work towards a
common goal*



Environment

Indaver's commitment to sustainability includes efficient use of resources and respect for the environment. Indaver is committed to Responsible Care® and expects its suppliers to make similar commitments to continuously improve their environmental performance.

This comprises the following aspects:

Full compliance

Indaver is committed to meeting the requirements of relevant legislation in the countries and regions in which it operates, no matter if a country is following EU guidelines, to the efficient use of natural resources and energy, and to reducing continuously the environmental impact of its operations and products through the adoption of sustainable practices. These commitments are integral to the way Indaver does business and we expect our suppliers to share this commitment.

Monitoring and reporting

Indaver requires suppliers to maintain effective policies, processes and procedures to manage their environmental impact.

Suppliers will monitor and report publicly on their environmental and energy performance, both to the authorities and to the large audience if required by law.

Suppliers should adopt suitable and robust management practices for environmental protection. Suppliers who have management systems accredited to ISO 14001 or equivalent will be deemed to satisfy this requirement.

Waste and Emission

Suppliers will have systems in place to ensure safe management of waste, air emission and wastewater discharges.

Any waste, wastewater or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled and treated prior to release into the environment.

Suppliers shall have systems in place to prevent and mitigate accidental spills and releases in the environment.

*The generations
to come will
thank us for
our climate
protection efforts*



Resource Conservation and Climate Protection

Suppliers are expected to use natural resources (e.g. water, sources of energy, raw materials) in a sustainable way.

Suppliers are required to do the utmost to re-use and recycle their products as much as possible throughout their life-cycle in such a way that it causes no damage to the people or the environment in the short and long run.

Security & traceability

Suppliers will have good security practices across their supply chains. Suppliers will maintain processes and standards that are designed to assure the integrity of each service to Indaver from its origin through to its destination and all points in between.

*Facilitate
compliance
and promote
continuous
improvement*

Management Systems

Suppliers will meet generally recognized or contractually agreed quality requirements in order to provide goods and services that consistently meet Indaver's needs.

Suppliers are expected to implement management systems to facilitate compliance with all applicable laws and to promote continuous improvement with respect to the expectations set forth in this Supplier Code of Conduct. This includes the following aspects:

Legal and Other Requirements

Suppliers will comply with all applicable laws, regulations, contractual agreements and generally recognized standards.

Commitment and Accountability

Suppliers are encouraged to fulfill the expectations set forth in this Code of Conduct by allocating appropriate resources.

Risk Management

Suppliers are expected to implement mechanisms to identify, determine and manage risks in all areas addressed by this Code of Conduct and with respect to all applicable legal requirements.

Continuous Improvement

Suppliers are expected to continuously improve their sustainability performance by implementing appropriate measures.



Local Engagement

Indaver believes a company should play a significant and beneficial role within the local community and society in general. Since its foundation Indaver strives to make a positive social contribution, as well as a major economic one, wherever it conducts business. Our philosophy is that the community is not just another stakeholder in business, it is in fact the very purpose of its existence.

We expect our suppliers to contribute to the social, economic and institutional development of the local communities and societies in which they operate.

We recognise that the influence of our operations extends beyond our own local communities to those touched upon by our supply chain. We expect our suppliers also to contribute to the social, economic and institutional development of the communities in which they operate.

Engagement of local societies stimulates social, economic and institutional development

Where relevant, we expect that our suppliers will:

- **Engage** at the earliest practical stage with likely affected parties to discuss and respond to issues and conflicts concerning the management of social impacts of their operations and ensure that appropriate systems are in place for ongoing interaction with affected parties.
- **Contribute** to community development in collaboration with host communities and their representatives.
- **Encourage** partnerships to ensure that programmes (such as community health, education, local business development) are well designed and effectively delivered.
- **Enhance** social and economic development by focusing on eg. local employment.





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VIOLETIONS OF THE CODE

The underlying objective of the Code is to establish a basis for a positive development of sustainable procurement practices through dialogue and ongoing relationships.

The purpose of the Code of Conduct for suppliers is to strengthen the ethical environment of Indaver by providing guidance on the principles, standards, and responsibilities of conduct of all suppliers in the performance of their duties. These expectations are directly derived from Indaver's core values.

This Code is intended to deter wrongdoing and to promote the conduct of all company business in accordance with high standards of integrity and in compliance with all applicable laws and regulations.

Suppliers are expected to use good judgment and common sense in seeking to comply with all applicable laws, rules and regulations and to ask for advice when you are uncertain about them.

However, in cases of severe violation of the Code, such as Supplier engaging in or benefiting from the use of child labour, corruption, bribery, severe violation of internationally recognized labour rights and/significant damage to the environment, Indaver will contact the supplier and will, subject to prevailing contractual provisions, request to terminate the practice. If necessary, Indaver will set up a dialogue around prevention of the same in the future or terminate the contract with immediate effect.



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WHISTLE BLOWER PROCEDURE

We believe that high business standards play an essential role in ensuring our continued growth and success. It's about being upstanding in our actions so we can be proud of the work we do.

The Indaver Whistle blower procedure for suppliers

The Indaver Whistle blower system is a confidential channel through which you, as a supplier, can raise concerns about possible violations of laws or Indaver Group Rules in the following areas: money laundering, corruption, foreign trade controls, retaliation, insider trading, competition law, IT security, data privacy, threats to health, safety and environment, and sexual harassment or discrimination. Within scope is the reporting of possible violations of laws or regulations, or issues that may expose the Group to serious legal risks.

The whistle blowing process

Once you submit a report via email you receive a confirmation that your complaint is registered and for further follow-up on your submission. Your report is initially reviewed by our Compliance Officer, who is part of Group Legal department and who is appointed to deal with these type of strictly private and sensitive affairs.

You can file a concern 24 hours a day, seven days a week. It can accommodate calls in all languages of the regions where Indaver is active, and you can submit a report anonymously.

Any report you make will be kept confidential to the fullest extent possible in conducting a thorough investigation. Persons will be notified of and/or involved in an investigation in a "need to know" basis.

Reporting of possible misconduct

We strive to conduct our business in a responsible manner. We welcome concerns from anyone outside the Indaver Group on acts made by employees, management, our board of directors and business partners linked to the Indaver Group operations, e.g. third party agents, brokers, vendors, suppliers or contractors/subcontractors.

To justify the trust placed in Indaver we place the highest priority on the integrity and transparency of our business processes. Therefore, it is essential that Indaver obtains knowledge of any compliance violations, in particular violations of the Code of Conduct for suppliers. Reliable reporting channels for external stakeholders are indispensable for effective compliance, because they help ensure that possible misconduct is reported, thoroughly investigated and brought to light.

Compliance Hotline “Tell us”

The compliance hotline “Tell us” is a secure way of reporting potential compliance violations. Reports can be submitted at any time of the day or night, anywhere in the world, in a safe, confidential and if desired, anonymous manner. The hotline is operated by a party specializing in the secure and confidential handling of sensitive content. Incoming reports are not traced and reporting parties are not automatically registered. The content of incoming reports is forwarded by the service provider to the Indaver Corporate Compliance Officer for clarification.

ComplianceOfficer@indaver.com

The decision on further actions to be taken is made there.

All reports are treated confidentially and the whistle blower will in no case be retaliated.

