



Supplier **Code of Conduct**

Revision 2
09 March/2023





#01 Introduction



The following POST Luxembourg entities:

- POST Luxembourg
- POST Telecom S.A.

Hereafter referred to collectively as “POST Luxembourg”, have voluntarily committed to sustainable development in procurement and subcontracting and, more generally, in their relationships with third parties.

This code indicates **POST Luxembourg’s intention to promote sustainable development** with its suppliers, entrepreneurs, subcontractors and service providers (hereafter the “Suppliers”).

POST Luxembourg plans to review its responsible purchasing policy periodically in order to **adapt to new regulations, encourage continuous improvement and monitor compliance**. POST Luxembourg strongly encourages its Suppliers to support and participate in applying these principles, and recommends providing feedback from the field so that we may continue to improve.

#02 Commitments



Beyond the provisions of this code, the Supplier shall comply with and develop in compliance with the international, European and national regulations in force.

POST Luxembourg also demands compliance with the following conventions:

- The United Nations (UN) Universal Declaration of Human Rights (www.un.org),
- International Labour Organization (ILO) conventions (www.ilo.org),
- the Organisation for Economic Co-operation and Development's (OECD) guidelines (www.oecd.org).

The Supplier **shall make every effort** to follow, apply, and enforce with its own suppliers and subcontractors, all commitments described in this code, including, but not limited to:

- implementing performance indicators, monitoring, reporting and introducing measures for improvement
- training their employees
- assigning a team or senior manager to CSR policies
- obtaining the appropriate certifications

2.1 Environment



The Supplier and its subcontractors shall implement, develop and encourage policies to reduce their environmental impact.

They commit to:

- **limiting waste and emissions** generated by their business and ensuring that they are disposed of in environmentally friendly ways.
- endeavouring to manufacture and act in an **environmentally friendly** way.
- endeavouring to **conserve natural resources**, specifically by applying a policy to **reduce energy consumption** and **packaging** and ensuring reuse and **recycling** of the resources used.
- Endeavouring to maximise and promote local consumption.

2.2 Ethics

They shall avoid and fight against the following practices:

- **Conflicts of interest:** The Supplier and its subcontractors commit to identifying, divulging and avoiding situations where there exists a real or potential conflict of interest between POST Luxembourg and/or its agents.
- **Corruption:** The relationships between POST Luxembourg and the Supplier should not lead to behaviour or instances that may be considered active or passive corruption or complicity with insider influence or favouritism. The Supplier should not offer any advantages to POST Luxembourg agents, representatives of governments and political parties or any representative of a public or private entity with the only goal of obtaining or maintaining a transaction or commercial advantage or receiving any convenience or favour that implies transgressing regulations.
- **Money laundering:** The Supplier and its subcontractors shall follow all applicable laws and regulations on money laundering.
- **Competition:** The Supplier and its subcontractors shall follow all applicable laws and regulations on competition law.
- **Intellectual Property:** The Supplier and its subcontractors commit to doing business in compliance with the intellectual property rights of third parties and, more generally, following all applicable laws and regulations on industrial and intellectual property.
- **Whistleblowing:** The Supplier and its subcontractors commit to implementing appropriate measures that allow their employees to report unethical behaviour.
- **Security of information and data:** The Supplier and its subcontractors shall follow all applicable laws and regulations on information and data protection and security.



2.3 Social

The Supplier shall proactively contribute to promoting diversity and fighting:

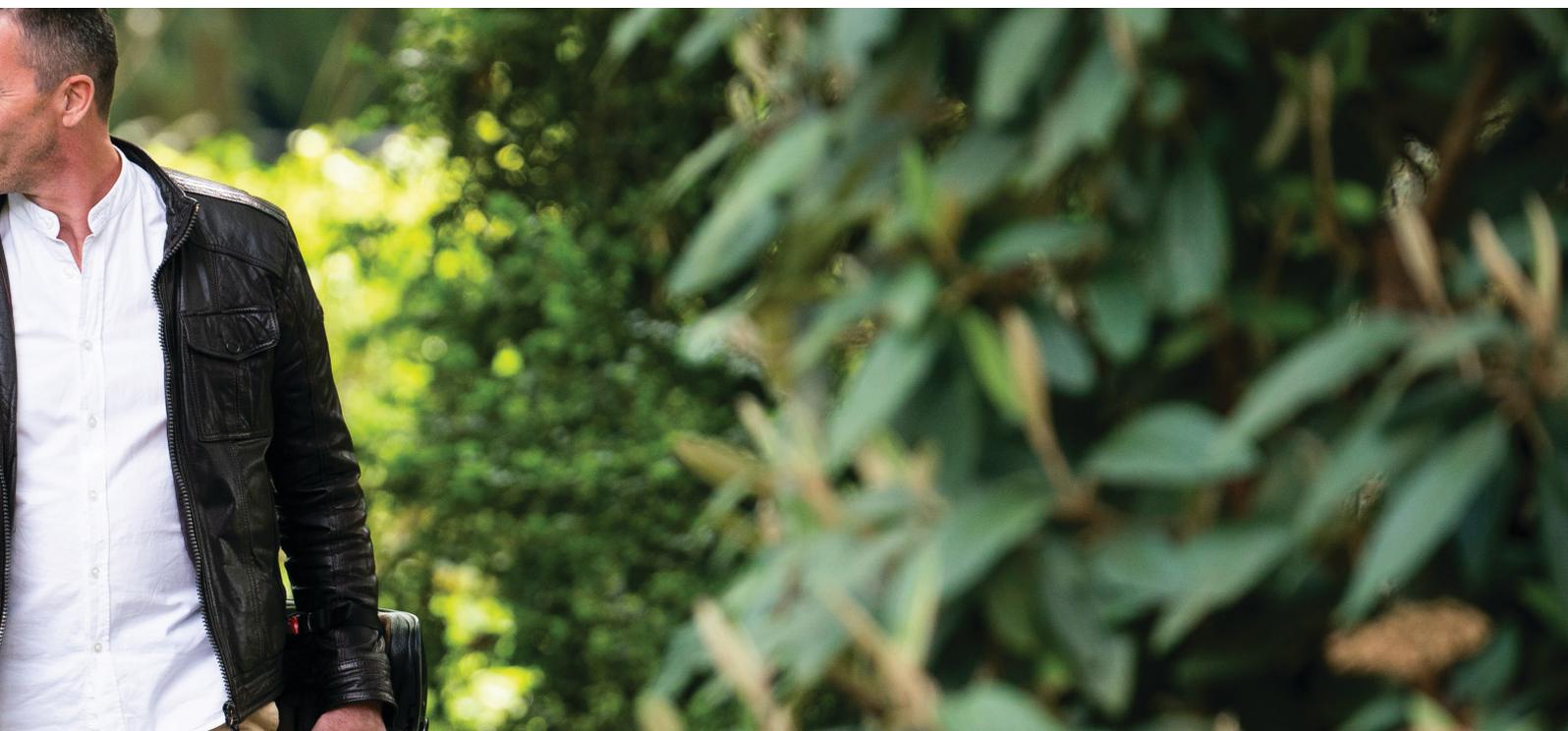
- all kinds of **illegal work** in application of the national and international regulations in force,
- all kinds of **forced labour** under ILO conventions no. 29 and no. 105,
- **child labour** under ILO conventions no. 182 and no. 138,
- all kinds of **discrimination** in access to employment based on gender, race, religion, age, disability, sexual orientation, political opinion, nationality and social or ethnic origin of the person under ILO convention no. 111.

The Supplier shall comply with all legal provisions and collective agreements related to **labour conditions** as well as articles 23 and 24 of the Universal Declaration of Human Rights, and more specifically regarding:

- Maximum work time,
- Compensation for overtime,
- Minimum salary.

The Supplier and its subcontractors shall apply **high standards in health and job safety**. The Supplier and its subcontractors shall specifically ensure that their work does not endanger the health and safety of their staff, users of their products or the population.

The Supplier and its subcontractors shall make every effort to reduce **risks of bodily injury** and limit activities that pose a **health risk** insofar as possible. They shall implement a proactive policy to reduce accidents and invest in systems for detecting, avoiding or neutralising any threats to their staff's health or safety.



#03 Implementation



Suppliers are expected to ensure and verify that their employees, representatives and subcontractors understand and comply with this code. POST Luxembourg encourages Suppliers to **pass on the principles of this code to their suppliers and subcontractors** and implement a similar code with them.

The Supplier commits to receiving, insofar as possible, and making sure that its own suppliers and subcontractors receive, any internal and external auditors which may be mandated by POST Luxembourg to ensure proper application of this code. If a Supplier, due to extenuating circumstances, is unable to comply with certain provisions of this code, it will be expected to inform POST Luxembourg so that they may agree on the appropriate corrective measures to take.

Compliance with the commitments indicated by this code, as well as continuous progress towards best possible practices, are an integral part of **POST Luxembourg group's supplier evaluation criteria**.

Suppliers are strongly encouraged to collaborate with POST Luxembourg to identify any potential improvements and continuous progress throughout the supply chain. **POST Luxembourg proposes collaborating with suppliers and their subcontractors if necessary** in order to define and implement their action plan to comply with the principles of this code.

#04 Claims



The relationship between POST, its suppliers and subcontractors is part of a collaboration based on respect, honesty, trust, equity, integrity and transparency.

POST's suppliers, their employees and all external stakeholders may communicate any ideas, claims, and alerts through the following channels.

Contact

POST Luxembourg
Procurement Department
38, place de la Gare
L-1616 Luxembourg
contact.achats@post.lu



