

**POST  
LUXEMBOURG  
GROUP**

**SUPPLIERS'  
CODE OF CONDUCT**





# #01 PREAMBLE

The following POST Luxembourg entities:

- POST Luxembourg
- POST Telecom S.A. and
- POST Telecom PSF S.A.

Hereinafter collectively referred to as "POST Luxembourg", have committed themselves to a voluntary approach to sustainable development in the context of their purchases and subcontracting and, more generally, in the context of their relationships with third parties.

This charter testifies to the **willingness of POST Luxembourg to promote the application of sustainable development principles** to its suppliers, contractors, subcontractors and service providers (hereinafter: "Suppliers").

POST Luxembourg strongly encourages its Suppliers to support and apply these principles.

# #02 REGULATIONS

In addition to the provisions of this charter, the Supplier shall comply with, and develop their operation in compliance with, the international, European and national regulations in force.

POST Luxembourg furthermore demands compliance with the following conventions:

- the United Nations (UN) Universal Declaration of Human Rights ([www.un.org](http://www.un.org)),
- the conventions of the International Labour Organization (ILO) ([www.ilo.org](http://www.ilo.org)),
- the guiding principles of the Organisation for Economic Co-operation and Development (OECD) ([www.oecd.org](http://www.oecd.org)).





# #03 COMMITMENTS

The Supplier **shall make every effort** to respect and implement all of the commitments set out in this charter and to ensure that their own suppliers and subcontractors also respect these commitments.



## 3.1. Working values

The Supplier shall contribute proactively to combating:

- any form of **illegal work**, by applying the national and international regulations in force;
- any form of forced labour, in accordance with ILO conventions Nos 29 and 105;
- **child labour**, in accordance with ILO conventions Nos 182 and 138;
- any form of **discrimination** affecting access to employment and relating to a person's gender, race, religion, age, disability, sexual orientation, political opinion, nationality or social or ethnic origin, in accordance with ILO convention No 111.

The Supplier shall ensure compliance with the applicable legal provisions and collective agreements relating to **working conditions**, as well as Articles 23 and 24 of the Universal Declaration of Human Rights. More specifically, this concerns:

- the maximum working time,
- the remuneration of overtime,
- the minimum wage.

## 3.2. Environment

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

In particular, they shall undertake to:

- **limit waste and emissions** generated by their activity and see that they are disposed of using environmentally friendly solutions;
- strive to act and produce their products in an **ecologically responsible** manner;
- strive to **preserve natural resources**, particularly to apply a policy of **reducing their packaging and energy consumption**, and to ensure that the resources used are **recycled**.

## 3.3. Ethics

They shall avoid and combat the following practices:

- **Conflicts of interest**: The Supplier and their subcontractors shall undertake to identify, divulge and avoid situations in which there is a real or potential

conflict of interest with POST Luxembourg and/or its agents.

- **Corruption**: Relationships between POST Luxembourg and the Supplier must not give rise to behaviour that might be qualified as active or passive corruption or complicity in influence peddling or favouritism. The Supplier must not offer any advantage whatsoever to POST Luxembourg agents, to State or political party representatives, or to any representative of a public or private institution, with the sole aim of obtaining or maintaining a transaction or a commercial advantage or receiving any facility or favour involving transgressing a regulation.
- **Money laundering**: The Supplier and their subcontractors shall comply with all applicable laws and regulations relating to money laundering.
- **Competition**: The Supplier and their subcontractors shall comply with all applicable laws and regulations relating to competition law.
- **Intellectual Property**: The Supplier and their subcontractors undertake to operate their activities with due respect for third-party intellectual property rights and, more generally, to respect all applicable laws and regulations relating to intellectual and industrial property.

## 3.4. Health and safety in the workplace

The Supplier and their subcontractors shall apply **the highest standards in the area of health and safety in the workplace**. To this end, the Supplier and their subcontractors shall particularly ensure that their activities do not compromise the health and safety of their staff, users of their products or the general public.

The Supplier and their subcontractors shall do everything in their power to reduce the **risk of bodily injury** and to limit activities involving a **health risk** as much as possible. They shall implement a proactive accident reduction and prevention policy and invest in systems enabling them to detect, avoid or neutralise any threat to the health and safety of their staff.



## #04

## IMPLEMENTATION

Suppliers are required to ensure and check that their employees, representatives and subcontractors all understand and comply with this charter. POST Luxembourg encourages Suppliers **to pass on the principles of this charter to their own suppliers and subcontractors**, and to implement a similar code of conduct therewith.

The Supplier undertakes to receive and, wherever possible, ensure that their own suppliers and subcontractors receive internal and external auditors who may be commissioned by POST Luxembourg to check that this charter is being correctly applied. Should a Supplier, due to particular circumstances, be unable to comply with certain provisions of this charter, they must inform POST Luxembourg accordingly so that a joint decision may be taken regarding the appropriate corrective measures to be implemented.

Honouring the commitments set out in this charter, as well as the ongoing progress actions undertaken to align with it as closely as possible, are an integral part of the **POST Luxembourg group supplier evaluation criteria**.

Suppliers are strongly encouraged to collaborate with POST Luxembourg in identifying any potential for improvement and ongoing progress throughout the supply chain. **If necessary, POST Luxembourg can offer guidance to its suppliers and their subcontractors** in defining and implementing their action plan to ensure compliance with the principles of this charter.

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