

Heras

Supplier Code of Conduct

Introduction

Heras is committed to the highest levels of legal, ethical and moral standards, which we set out in our Code of Business Conduct.

We place business ethics and Corporate Social Responsibility (CSR) at the forefront of all our business dealings, including those with our suppliers, both direct and indirect, recognising that they are key stakeholders in the success of our business. Not surprisingly, our procurement requirements are very high; we expect our suppliers to share our desire to be the best, to be innovative and efficient and quality driven.

Above all we only choose suppliers who share our unwavering commitment to good ethical practices and who meet our standards in respect of health & safety, human rights and environmental stewardship. This Supplier Code of Conduct (SCoC) sets out these CSR requirements and how we want to ensure your compliance.

In return, we strive to be a fair and honest partner, firmly believing that relationships built on trust and integrity will be sustainable and beneficial for all.

Supplier Requirements

There are four areas where we would like your support and commitment:

Safety & Health

To comply, as a minimum, with all applicable Health & Safety legislation.

To continually improve Health & Safety performance towards best industry practice.



Supplier Requirements

There are four areas where we would like your support and commitment:

People & Community

- ▶ To support and respect the protection of human rights within their areas of influence.
- ▶ To respect freedom of association and the effective recognition of the right to collective bargaining by employees.
- ▶ To prohibit all forms of modern slavery including:
 - ▶ Forced Labour
 - ▶ Bonded Labour
 - ▶ Compulsory Labour
 - ▶ Child Labour
- ▶ To support the principles of Equality, Fairness, Inclusion and Respect when dealing with the recruitment and selection of employees.

Supplier Requirements

There are four areas where we would like your support and commitment:

Environment & Climate Change

- ▶ To comply, as a minimum, with all applicable environmental legislation.
- ▶ To support a proactive approach to environmental challenges including:
 - ▶ Energy Optimisation
 - ▶ Resource Efficiency
 - ▶ Waste Management & Recycling

Supplier Requirements

There are four areas where we would like your support and commitment:

Governance & Compliance

- ▶ To comply with the concepts, principles and recommendations in the OECD Guidelines for Multinational Enterprises
- ▶ To comply with all relevant legislation including but not exclusively:
 - ▶ Section 1502 of the Dodd-Frank

Act which aims to prevent the use of minerals that directly or indirectly finance or benefit armed groups in the Democratic Republic of the Congo (DRC) or in adjoining countries.

- ▶ All relevant anti-bribery and anticorruption legislation in respect of their dealings with Heras
- ▶ US and EU trade sanctions requirements
- ▶ EU General Data Protection regulations and requirements
- ▶ All relevant anti-money laundering legislation.

Assurance Procedures

We look to seek assurance that suppliers are working to our expected levels in a number of different ways depending upon:

- ▶ The risks and legislative requirements associated with what we are buying
- ▶ The source country of the goods and services purchased and the risk that poses
- ▶ The level of spend

Please note that Heras may terminate a contract with a supplier who violates this Code or refuses, if asked, to take part in a remediation plan. Heras will also exclude from any tendering process suppliers who do not demonstrate that they meet our high ethical and CSR standards or compliance with relevant laws.

Likewise, Heras looks to reward and recognize great performance and innovation with its suppliers.

Assurance Procedures

We will communicate our SCoC to all suppliers on a regular basis. As the risk profile increases we will step up our assurance processes proportionally to include one or some of the following methods:

- ▶ Direct communication and supplier sign off
- ▶ Specific contract clauses
- ▶ Completion of SCoC questionnaire
- ▶ Heras led site assessment
- ▶ 3rd party audit / assessment / screening.
- ▶ Corrective action plans

Please note site assessment and audit processes will be specifically agreed with both parties prior to commencement in order to demonstrate compliance and provide transparency. Only if we uphold these high ethical and CSR standards, can we safeguard our excellent reputation and ensure our shared, continued success. We will constantly monitor the operation of this Code and make further improvements where we believe this can lead to even better practice.

Heras Hotline

This Code contains general requirements applicable to all suppliers of Heras and its businesses. Specific approaches and contractual provisions with a higher standard supersede these general requirements. If there is a conflict between the law and this Code, the law prevails.

We also expect that suppliers have similar requirements in place for their upstream supply chains and to exercise due diligence in verifying their suppliers' compliance.

Raising a Concern

Heras has an independent, confidential hotline service allowing employees, customers, suppliers or other external stakeholders to raise concerns they may have about unethical, inappropriate or illegal behaviour. This is a multi-lingual, 24-7 service. All concerns raised are initially assessed by the Legal and Compliance and then passed to appropriate management for investigation.

To raise a concern please mail: administratie@bmwe.nl