

Eurostrut[®]

Cable Management Systems & Solutions

Code of Conduct

1. Introduction

Eurostrut Group B.V., including all operating companies (hereinafter referred to as Eurostrut), is committed to supporting the highest standards of integrity, ethical behavior, and compliance with all applicable laws and regulations. This Code of Conduct outlines the principles and expectations for our business partners, employees, and stakeholders to ensure responsible and ethical business practices.

We believe that ethical behavior and integrity are essential for sustainable success. This Code serves as a practical guide to help navigate complex situations and make the right choices in alignment with our values.

2. Compliance with Laws and Regulations

Eurostrut requires all business partners and employees to follow all applicable laws, regulations, and norms. Where national legislation is stricter, this takes precedence. This includes adherence to local, national, and international laws governing our operations.

Examples of compliance obligations include:

- Observing tax and labor laws
- Respecting international trade and customs regulations
- Avoiding participation in or facilitation of fraudulent practices

Employees and partners must remain informed about relevant legal developments and seek guidance when uncertain.

3. Anti-Corruption and Bribery

Eurostrut strictly prohibits all forms of corruption, bribery, or any form of extortion. Business partners and employees must not offer, promise, or give any form of bribe or illicit payment to influence business decisions, nor do they make any such attempts.

This includes:

- Direct or indirect payments to public officials
- Providing gifts or entertainment in exchange for favorable treatment

Gifts and invitations are managed following the principles of appropriateness and transparency. Any requests for benefits must be reported at once to management.

4. Conflicts of Interest

Decisions related to Eurostrut B.V. must be made based on objective criteria. Eurostrut expects its employees to show loyalty towards the company.

Conflicts of interest may arise when:

- An employee has a financial interest in a supplier or competitor
- Personal relationships interfere with professional judgment
- An employee takes on a secondary job that compromises objectivity

All potential conflicts must be shown and mitigated in consultation with management.

5. Fair Competition and Antitrust Laws

Eurostrut is committed to fair competition and free development of all participants in the market. Business partners and employees must follow all antitrust and competition laws.

Prohibited practices include:

- Price fixing
- Market division
- Bid rigging
- Abuse of dominant position

Engaging in fair and transparent competition fosters innovation and trust.

6. Export Control and Sanctions

Compliance with all applicable import and export control regulations, economic sanctions, and embargoes is mandatory for all business partners and employees.

Key obligations include:

- Screening transactions against sanctioned party lists
- Understanding licensing requirements for sensitive goods or services
- Avoiding transactions with embargoed countries or individuals

Violations may lead to severe legal consequences.

7. Environmental Protection

Eurostrut is dedicated to environmental sustainability. Business partners and employees are expected to actively implement measures to protect the climate, reduce carbon emissions, and use resources responsibly.

Environmental initiatives may include:

- Waste reduction and recycling
- Energy-efficient (production) methods
- Sustainable sourcing of materials
- Electric transport for people and cargo.

We aim to minimize our ecological footprint and support green innovation.

8. Health and Safety

Ensuring safe and healthy working conditions is a priority. Business partners and employees must provide necessary safety equipment, conduct regular training, and promptly address any identified risks or incidents.

This includes:

- Conducting risk assessments
- Ensuring compliance with occupational health regulations
- Encouraging a culture of safety and incident reporting

Preventive action and employee well-being are at the heart of our operations.

9. Human Rights and Non-Discrimination

Eurostrut respects human rights and promotes equality. Making statements or taking actions against people in any way related to their race, religion, gender, beliefs, and/or sexual orientation, or making any distinction based on these factors (race, religion, etc.), is not tolerated at Eurostrut. Displaying any political, philosophical, or religious symbol is prohibited.

We support:

- Freedom of association
- Fair treatment regardless of background
- A respectful, inclusive, and harassment-free work environment

We uphold the dignity of every individual and strive to create equal opportunities.

10. Fair Working Conditions

Fair working conditions, including compensation and compliance with working hour regulations, are essential. Child labor and forced labor are strictly prohibited.

Eurostrut B.V. supports:

- Living wages per local standards
- Transparent employment contracts
- Freedom from coercion or exploitation in the workplace

We expect partners to provide decent working conditions and respect labor rights.

11. Data Protection and Confidentiality

Personal data relating to employees, clients, business partners, and other third parties must be processed with care and confidentiality, in compliance with data protection regulations.

Confidential information includes:

- Trade secrets
- Client lists
- Financial data
- Strategic plans

Employees and partners must manage sensitive information responsibly, avoid unauthorized disclosure, and implement robust data security measures.

12. Social Media Use

Eurostrut recognizes the importance of social media as a communication tool. However, employees and business partners must use social media responsibly and in a manner that does not harm the company's reputation or violate any laws or company policies.

The following guidelines must be observed:

- Professionalism: Always keep a professional tone and avoid posting content that could be considered offensive, discriminatory, or harmful.
- Confidentiality: Do not share confidential or proprietary information about Eurostrut B.V., its clients, or its business partners.
- Respect: Be respectful of others' opinions and avoid engaging in arguments or negative discussions about the company or its stakeholders.
- Compliance: Ensure that all social media activities follow applicable laws, regulations, and company policies.

13. Reporting and Compliance

Any breaches of this Code of Conduct must be reported at once. Eurostrut provides a confidential and anonymous reporting system to ensure compliance and address concerns without fear of retaliation.

Reporting mechanisms include:

- Contacting management directly
- Using an anonymous reporting tool on the intranet or website
- Consulting with a trusted supervisor or external confidential counselor

All reports will be taken seriously and managed with discretion.

14. Consequences of Non-Compliance

Failure to follow this Code of Conduct may result in termination of the business relationship and other contractual consequences.

In severe cases, Eurostrut may also take legal action or report violations to authorities.

Contact Information

For any questions or concerns about this Code of Conduct, please contact:

Eurostrut B.V.
Van Heekstraat 18
3125 BN Schiedam
Netherlands
Telephone: +31 (0)10 522 33 51
Email: info@eurostrut.com
Website: www.eurostrut.com