

Michel Oprey & Beisterveld | Code of Conduct

Introduction.

This Code of Conduct is based on the core values for corporate trustworthiness, the conducted business with integrity and in compliance with laws and regulations.

Michel Oprey's Code of Conduct applies to our employees and business partners, who we expect to act in line with this Code of Conduct. We also require our business partners, e.g. suppliers, to impose these requirements on their sub-suppliers etc. We believe in co-operation and we are willing to work with our business partners to achieve sustainable solutions. The requirements stated in this Code of Conduct are mainly based on internationally agreed conventions such as the UN Convention universal Declaration of Human Rights and applicable ILO Conventions, the UN Convention on the Rights of the Child and the principles in the UN Global Compact.

1. General requirements.

The business partner shall acknowledge, accept and sign the requirements as stated in this Code of Conduct. We expect our business partner to do their utmost, to achieve our standards. We also put great emphasis on transparency and we expect communication to be open, truthful, complete, timely and not in any way misleading. If business partners does not comply or show unwillingness to take corrective actions as agreed upon, it will ultimately result in ending the business relationship. Any material breaches of Michel Oprey's Code of Conduct must immediately be reported to the management of Michel Oprey, see point 4 below. Any third party chosen by Michel Oprey, reserves the right to make announced or unannounced inspection visits at sites of business partners, for audit purposes and expects to get access to premises and personnel.

2. Legal requirements.

Michel Oprey expects their business partners, in all their activities, to follow the national laws in the countries in which they operate. Should any requirement in this Code, conflict with the national law in any country or territory, the law must always be followed. Michel Oprey's requirements may go beyond the requirements set out in national law.

3. Ethical, environmental and social requirements.

3.1 Health & safety

Michel Oprey expects its business partners to follow all relevant legislations, regulations and directives in the country in which they operate, to ensure a safe and healthy workplace.

The workplace shall be organized in such a way that the well-being and health of the employees are neither jeopardized nor compromised. This involves for example the availability of clean water, rest area's, shaded workplaces, toilets, facemasks, boots, gloves and googles.

3.2 Discrimination and gender.

Every employee shall be treated with respect and dignity. No use of humiliating or physical punishment is accepted, and no employee shall be subject to physical, sexual, psychological or verbal harassment or abuse. No employee shall be discriminated against on the grounds of sex, race, color, age, caste, pregnancy, sexual orientation, religion, political opinion, nationality, ethnic origin, disease or disability. All employees are entitled to a written employment contract, in the local language, stipulating the employment terms and conditions, all in line with national laws and regulations.

3.3 Labor unions.

All employees have the right to form or join associations of their own choosing, and to bargain collectively.

3.4 Living Wages.

All employees are entitled to living wages which enable families to live a decent life with sufficient water, food, medical care, etc.

3.5 Forced and bonded labor.

We do not accept any forms of forced, prisoned, bonded or involuntary labour in the production of goods or services, directly or indirectly for Michel Oprey.

3.6 Child labor.

Michel Oprey does not accept child labour in any shape or form.

Business partners shall comply with the national minimum age for employment, or the age of completion of compulsory education and shall not employ any persons under the age of 18.

3.7 Land rights and environment.

Michel Oprey expects its business partners to guarantee that any materials used and products produced, comply with legislation and regulations regarding the protection of the environment. The business partner must have the relevant environmental permits and licenses for its operations. On request, the business partner shall provide with applicable data for product information, safety datasheets etc.

Waste

Any waste, and in particular hazardous waste, must be taken care of in a responsible manner and in accordance with local law and regulations regarding handling, storage, transportation, recycling and disposal.

Chemicals

Chemicals can only be used in compliance with applicable environmental laws and regulations in the country of operation. Business partners shall ensure that workers that purchase, store, handle and use chemicals have the appropriate competences and are adequately trained. Business partners shall store, handle and transport chemicals in a way that prevents emissions to air, ground and water, prevent risks of ignition/explosion and ensure worker's health and safety

Transportation

Michel Oprey and its business partners shall actively minimize the logistic impact on the environment, within reasonable means.

Land rights

Operations in quarries or factories should be done with protection of the rights of existing land owners, cultural buildings and monuments and avoiding forced moving of people.

3.8 Relation with business partners – Ethics.

Corruption

Michel Oprey has a zero tolerance policy on bribery and corruption. We shall not offer any business partner, direct or indirect, any rewards or benefits in violation of either applicable laws or reasonable and generally accepted business practice.

Advantages

Michel Oprey's employees cannot accept payments, gifts, or any other kind of reimbursement from a business partner or third party that could affect or appear to affect their objectivity in their business decisions.

Confidential/ information

Employees and/or business partners of Michel Oprey must never disclose confidential company information to any person outside or within the company, except with a prior permission from the management of Michel Oprey. Confidential information includes our financial and commercial relationships, offers, strategies, business partner's information, information on business partner's capacity, sensitive personnel data, or any other information concerning our business, which is not generally known outside the company. In other words, any information that has not been published or communicated otherwise by or through Michel Oprey.

Cartel

Michel Oprey strongly objects to any association or cartel agreement intended to control market pricing, salary levels or other business aspects normally ruled by an open market.

4. Reporting non-compliance (whistleblowing).

Our Code of Conduct, group directives and operating procedures are intended to prevent and detect improper or illegal activities. Any breach against our Code of Conduct, by business partners or employees, has to be reported to Michel Oprey's management. This can also be done anonymously. In such cases you can report suspected illegal activities to our Managing Director, Jos Simons, phone 0031-475-417000, email Jos.simons@mo-b.nl.

The whistle-blower protection policy creates a safe and confidential environment for business partners and employees, to make such reports. This policy governs the reporting and investigation of alleged improper or illegal activities at our company. In accordance with our Code of Conduct we will not tolerate retaliation against a person for reporting improper behavior in good faith.

Confidentiality will be maintained to the full extent permitted by law. All reports are subject to appropriate investigation. It's a breach of our Code of Conduct to refrain from reporting a violation or suspected violation that business partners or employees know about, or to refuse to cooperate with the investigation of a suspected violation.

Echt, 1-3-2020
Michel Oprey & Beisterveld B.V.

Business Partner

Date

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