



CODE OF CONDUCT

This code of conduct applies to all Synergie suppliers & partners.

Ed. 2024

This code of conduct is drawn up and administered by the Compliance Team

CODE OF CONDUCT

Synergie chooses suppliers and partners committed to an integrated CSR policy on Ethics, Sustainable Business and Respect for the Protection of Personal Data of Third Parties (GDPR).

This policy means that we adhere to the values and principles in this code and expect the same from all our business partners. This approach is entirely consistent with the United Nations Charter, of which SYNERGIE is a part through preparing its own statement each year.

Becoming a SYNERGIE supplier or partner means sharing the values and objectives in this Code of Conduct and adhering to them in all respects.

If a supplier or partner fails to do so, it cannot fulfil its contractual obligations, which in serious cases may lead to termination of the business relationship.



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CORPORATE SOCIAL RESPONSIBILITY

Synergie chooses only suppliers and partners who scrupulously comply with the Universal Declaration of Human Rights and the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, as well as all applicable laws and rules relating to corporate social responsibility (as do their own suppliers and partners).

Abolition of forced and compulsory labour

Suppliers and partners must ensure that under no circumstances do they use forced labour by threatening punishment, withholding identity documents or any other form of coercion.

Intimidation and abuse

Synergie expects suppliers and partners to treat their employees with respect and dignity. Suppliers and partners shall not allow or apply any form of physical punishment, moral or physical intimidation or any other abuse.

Salaries and benefits

In any event, suppliers and partners must pay wages and overtime at the legally determined times at the legal rate for the country of residence and provide employees with the legal benefits in force. No deduction from salary may be made as a disciplinary measure; deductions are only permitted for specific circumstances as defined in the employment regulations. No deduction from salary may be made beyond the cases specified in the Wage Protection Act. Suppliers and partners should implement healthcare and social protection provisions that comply with applicable legal requirements.

Trade union freedom and freedom of expression

Synergie expects suppliers and partners to respect and recognise the right of every employee to bargain collectively and to form or participate in a union of their choice, without any sanctions, discrimination or harassment.

Abolition of child labour

Suppliers and partners must be able to guarantee that no children under the age of 15 or who are still subject to full-time compulsory education are employed. In countries where local laws are stricter, the higher age shall apply.

Combating discrimination and promoting diversity and equal opportunities

Synergie expects suppliers and partners to treat all employees equally and fairly. Suppliers and partners shall not discriminate in any way on the basis of origin, gender, pregnancy, physical appearance, health status, morals, sexual orientation, age, political affiliation, trade union activities, etc. in recruitment, access to training, promotion or dismissal.

Health and safety

Suppliers and partners shall provide a safe and healthy work environment to prevent any accidents or injuries caused by, relating to, or occurring while working or handling equipment. They shall provide facilities capable of detecting, preventing or eliminating any risk to the health and safety of personnel and shall comply with applicable local and international laws and regulations.

Work and rest periods

Suppliers and partners shall comply with the rules on working time and overtime applicable under the law of the country of residence. They shall offer all employees and partners a rest period of at least 24 consecutive hours per week.

ETHICAL BUSINESS

Anti-corruption

As part of the French group Synergie, Synergie Belgium NV must comply with all the laws and regulations to combat corruption and influencing practices and, in particular, with the French law 'Sapin II' of 9 December 2016 (No. 2026 - 1691) on transparency, anti-corruption and modernisation of economic life.

This Code of Conduct has been drafted in the spirit of this law. Synergie wishes to conduct business in a fair manner and expects third parties related to them:

- neither to engage in nor to participate in any form of corruption, bribery or money laundering or tax evasion.
- nor to commit fraud and to take the necessary initiatives to avoid and combat any form of fraud.
- to follow all the regulations relating to corruption and to be compliant with them.

Gifts and invitations

Suppliers & partners undertake not to attempt to influence Synergie's employees by any illicit means. In this context, they may not propose any offers, promises, gifts or benefits that could lead to a favourable decision.

Ensuring healthy and fair competition

Suppliers and partners undertake to comply with the laws and rules protecting free and healthy competition.

They undertake not to engage in any unlawful price fixing and, where necessary, not to abuse their dominant position.

Suppliers and partners and their employees may not use any significant or undisclosed information held by public authorities as part of the business relationship with Synergie for speculative purposes.



ECOLOGICAL BUSINESS

SYNERGIE expects suppliers and partners to make a measurable commitment to the environment, especially the battle against pollution and nuisances associated with their operations (production/buildings/car fleet).

Suppliers and partners undertake to comply with local and international environmental regulations and standards and to implement environmental, health and safety management systems (such as ISO 14001, ISO 4500, ISO 9001).

They undertake to comply with any applicable sectoral and local environmental legislation.

Sustainable use of resources

Suppliers and partners undertake to use natural resources rationally by giving preference to renewable energy. They undertake to prevent waste and implement responsible practices at all levels of their business. This commitment includes the promotion of digitalisation and the use of environmentally friendly technologies.

Pollution and waste management

Suppliers and partners undertake to manage their waste responsibly. Waste should be managed according to the rule of the 3 Rs (Reduce, Reuse, Recycle). Waste and emissions to air and water are handled appropriately. Particular attention is paid here to hazardous wastes and emissions that should not be illegally abandoned, emitted or discharged.



RESPONSIBILITY FOR PERSONAL DATA PROTECTION AND INFORMATION SYSTEMS SECURITY

Suppliers and partners and their subcontractors undertake to comply with Regulation (EU) No. 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, known as the General Data Protection Regulation (GDPR). They undertake to adopt compliant policies and, where appropriate, to appoint a Data Protection Officer (DPO).

Suppliers and partners undertake to respect the legal and regulatory framework for their activity, as part of a continuous improvement process inspired by the international standard for information security management: ISO-IEC 27001.

Suppliers and partners undertake to immediately notify Synergie's DPO (dpo@synergiejobs.be) in the event of any loss of personal data or any other incident falling within the scope of the GDPR, in order to mitigate its consequences. If the supplier or partner works in the IT sector and/or it is likely that the supplier or partner will store and/or process the personal data entrusted to it in the context of its service provision, the supplier or partner undertakes to respond to Synergie's GDPR security questionnaire fully and truthfully and, where appropriate, to sign a processor agreement.

Tom Venoubeek



Approach to continuous improvement

Synergie wishes to involve suppliers, partners and subcontractors in a common approach to continuous improvement in order to identify any weaknesses in the procurement process and desirable developments in the areas of environmental protection, human rights, working conditions and respect for business ethics and the GDPR. Synergie therefore wishes to develop responsible purchasing policies with third parties.

SYNERGIE ADHERES TO THE 10 PRINCIPLES OF THE UNITED NATIONS GLOBAL COMPACT



www.un.org

The Global Compact's ten principles are inspired by the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development and the UN Convention against Corruption.

Companies are requested to observe the following principles:

Human rights

1st principle

Promoting and respecting the protection of international human rights legislation.

2nd principle

Not to be complicit in any human rights abuses.

International labour standards

3rd principle

Respecting freedom of association and recognising the right to collective bargaining.

4th principle

Contributing to the elimination of all forms of forced or compulsory labour.

5th principle

Contributing to the effective abolition of child labour.

6th principle

Contributing to the elimination of discrimination in labour and occupation.

Environment

7th principle

Applying the precautionary approach to environmental problems.

8th principle

Taking initiatives to promote greater environmental responsibility.

9th principle

Promoting the development and dissemination of environmentally friendly technologies.

Combating corruption

10th principle

Acting against corruption in all its forms, including extortion and bribery.

SYNERGIE COMMITS TO COMPLIANCE WITH THE CORE CONVENTIONS OF THE ILO

www.ilo.org

Core conventions of the International Labour Organization

C029 – [Convention \(No. 29\) on Forced Labour, 1930](#)

P029 – [2014 Protocol to the Convention on Forced Labour, 1930](#)

C087 – [Convention \(No. 87\) on Freedom of Association and Protection of the Right to Organise, 1948](#)

C098 – [Convention \(No. 98\) on the Right to Organise and Collectively Bargain, 1949](#)

C100 – [Convention \(No. 100\) on Equal Pay, 1951](#)

C105 – [Convention \(No. 105\) on the Abolition of Forced Labour, 1957](#)

C111 – [Convention \(No. 111\) on Discrimination \(Labour and Occupation\), 1958](#)

C138 – [Convention \(No. 138\) on Minimum Age, 1973](#)

C182 – [Convention \(No. 182\) on the Worst Forms of Child Labour, 1999](#)

Priority governance conventions

C081 – [Convention \(No. 81\) on Labour Inspection, 1947](#)

P081 – [1995 Protocol to the Convention on Labour Inspection, 1947](#)

C122 – [Convention \(No. 122\) on Labour Market Policy, 1964](#)

C129 – [Convention \(No. 129\) on Labour Inspection \(Agriculture\), 1969](#)

C144 – [Convention \(No. 144\) on Tripartite Consultations on International Labour Standards, 1976](#)

Technical conventions

C001 – [Convention \(No. 1\) on Working Time \(Industry\), 1919](#)

C026 – [Convention \(No. 26\) on Methods of Establishing Minimum Wages, 1928](#)

C131 – [Convention \(No. 131\) on Establishing Minimum Wages, 1970](#)

C155 – [Convention \(No. 155\) on Health and Safety of Workers, 1981](#)

P155 – [2002 Protocol to the Convention on Health and Safety of Workers, 1981](#)



International
Labour
Organization