

# Supplier Code of Conduct

Experts in perimeter protection





Heras Group (including all related legal (foreign) entities) is committed to the highest levels of legal, ethical and moral standards, which we set out in our Code of Business Conduct and related policies. We place business ethics and Environment, Social and Governance (ESG) at the forefront of all our business dealings, including those with our suppliers, both direct and indirect, recognizing 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, efficient and quality driven. Above all we only choose suppliers who share our unwavering commitment to good ethical practices and who meet our ESG standards. This Supplier Code of Conduct (SCoC) sets out these ESG 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. Let's work together to create a better world.

## Environment

Our planet provides us with a home and with precious resources. We need to protect that, now and for future generations. To be able to do this, Heras follows the lines of the Paris Agreement (2015). And we also expect from our suppliers to do their part on protecting our planet, namely:

- Comply with national environmental legislation, or with international standards where national legislation is weak or poorly enforced
- To comply with the [Conflict Minerals Regulation by the European Commission](#)
- To comply with the [Carbon Border Adjustment Mechanism \(CBAM\)](#) by providing carbon emission figures in line with CBAM regulations when applicable
- Identify the environmental impacts of their operations, and implement adequate measures to prevent, mitigate and remediate adverse impacts on the surrounding communities, natural resources, climate, and the overall environment
- To support a proactive approach to environmental challenges including:
  - Energy optimization
  - Renewable energy use
  - Resource efficiency
  - Strive towards a circular economy



## Social

People have a right to be treated with dignity. Human rights are inherent in all human beings, whatever their nationality, place of residence, sex, national or ethnic origin, color, religion, language or any other status. Every individual is entitled to enjoy human rights without discrimination. These rights are all interrelated, interdependent and indivisible.<sup>1</sup>

Also, our employees and their knowledge and expertise are paramount to us, and to keep them safe is our highest priority. Our goal is zero fatalities and lost time accidents, and to continually improve Health & Safety performance towards the best industry practice.

We as Heras respect and defend these rights, and we expect the same standard from our suppliers, namely to comply with:

- [The International Bill of Human Rights](#) and [United Nations \(UN\) Universal Declaration of Human Rights](#)
- [International Labour Organization \(ILO\): Labour standards, Conventions and Recommendations](#)
- [UN Guiding Principles on Business and Human Rights \(UNGPR\)](#)
- [OECD Guidelines for Multinational Enterprises](#)
- [UN Children's Rights and Business Principles](#)
- [UN Convention on Persons with Disabilities](#)
- [Gender Dimensions of the UN Guiding Principles on Business and Human Rights](#)
- [Ethical Trade Initiative \(ETI\) Base Code](#)
- REACH standards by not using any substances listed on the [List of restricted substances](#) and replace substances listed on the [List of substances of very high concern](#)
- Applicable Health & Safety legislation and to continually improve Health & Safety performance towards best industry practice
- All other applicable social laws and regulations

## Governance

Laws and rules are in place to protect people, community, planet and businesses. It is imperative that we comply to these rules and to be transparent about that. We expect the same from our suppliers, namely to comply with all relevant legislation including but not exclusively:

---

<sup>1</sup> [UN Global Compact](#).



- All relevant anti-bribery and anticorruption legislation (Sapin II) in respect of their dealings with Heras
- EU trade sanctions requirements
- EU General Data Protection regulations and requirements
- All relevant anti-money laundering legislation

## Assurance levels

We take into account the level of spend and the risks and legislative requirements associated with what we are buying. Note that a supplier is viewed as a risk when the country (the headquarters are) settled in and/or where goods and services are directly sourced from is considered an ESG risk.<sup>2</sup>

We communicate our SCoC to all suppliers on a regular basis. As the risk profile increases we will step up our assurance process. These are the levels:

- A. Direct communication and supplier sign off on this SCoC. Note that signing this supplier code of conduct is required for all suppliers
- B. Step A plus completion of SCoC questionnaire (see appendix I); applicable for suppliers in a risk area and/or an annual procurement value greater than €1m
- C. Step A and B plus Heras will create a supplier specific due diligence plan in accordance with the OECD Guidelines for Multinational Enterprises. Which will also include site visits

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 ESG 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. Signed documents, questionnaires, signed audits and corrective action plans (if applicable) will digitally be registered at Heras for ten years. Each document has a version date, so to track what version was signed. After important changes or a time period of five years, the SCoC questionnaire has to be renewed.

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

---

<sup>2</sup> Sources that are used are <https://risk-indexes.com> (risk score above forty) in combination with <https://mvoorisicochecker.nl>



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.

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 ESG standards or compliance with relevant laws. Likewise, Heras looks to reward and recognize great performance and innovation with its suppliers.

### Raising a Concern

Heras has a hotline service allowing employees, customers, suppliers or other external stakeholders to raise concerns they may have about unethical, inappropriate or illegal behavior. This is a multi-lingual, 24-7 service. All concerns raised are initially assessed by the ESG Manager and then passed to appropriate management for investigation. To raise a concern, please send an e-mail to: [ESG@heras.com](mailto:ESG@heras.com)

### Signature

Company Details	Company Name	
	Address	
	Postal code/Town	
	CEO/Managing Director	
	Date	

Signature by legally authorized person:

Please return a signed form to Heras B.V. to the attention of the Purchasing Department per email to [Inkoop@heras.nl](mailto:Inkoop@heras.nl).



## Appendix I - SCoC Questionnaire

Topic	Question	Answer	
Company Details	Company Name		
	Address		
	Postal code/Town		
	CEO/Managing Director		
	Type of Business		
	Telephone		
	E-mail		
	Website		
Key Employee Statistics	Number of employees		
	Minimum age requirement		
	Average age		
	Gender balance	Male	
		Female	
Average weekly working hours per employee			



## Social

### General

Question	Answer
Does the company have any social policies in place (examples: human rights policy, Health & Safety policy, Business Code of Conduct)? If so, please attach copies	

### The rights of Freedom of Association

Question	Answer
Does the company respect the right of workers to form and join trade unions – or to refrain from doing so – and bargain collectively, in a free and democratic way, without distinction whatsoever and irrespective of gender?	
Does the company ensure meaningful representation of all workers, without distinction whatsoever and irrespective of gender?	
Can the company confirm that it does not discriminate against workers because of trade union membership?	
Can the company confirm that it does not prevent workers' representatives and recruiters from having access to workers in the workplace or from interacting with them?	
Does the company allow workers to freely elect their own representatives with whom the company can enter into dialogue about workplace issues, when operating in countries where trade union activity is unlawful or where free and democratic trade union activity is not allowed?	



## No Discrimination, Violence or Harassment

Question	Answer
Can the company confirm that they treat all workers with respect and dignity?	
Does the company ensure that workers are not subject to any form of violence, harassment, and inhumane or degrading treatment in the workplace, as well as threats of violence and abuse, including corporal punishment, verbal, physical, sexual, economic or psychological abuse, mental or physical coercion, or other forms of harassment or intimidation?	
Does the company understand the possible grounds for discrimination in their specific context, and not discriminate or exclude persons based on sex, gender, age, religion, race, caste, birth, social background, disability, ethnic and national origin, nationality, membership in unions or any other legitimated organisations, political affiliation or opinions, sexual orientation, family responsibilities, marital status, pregnancy, diseases, or any other condition that could give rise to discrimination?	
Has the company established disciplinary procedures against discrimination, violence and harassment in writing and explain them verbally to workers in terms and language which they Understand? The disciplinary measures must be in line with national legislation	
Does the company provide gender-sensitive and equal opportunities and treatment throughout recruitment and employment?	
Can the company verify that workers are not harassed, disciplined, or retaliated upon for reporting issues on any of the grounds listed above?	





## Fair Remuneration

Question	Answer
Does the company comply, as a minimum, with wages mandated by governments' minimum wage legislation, or industry standards approved based on collective bargaining, whichever is higher? The wages shall refer to standard working hours	
Does the company pay wages in a regular, timely and stable manner, and fully in legal tender? Partial payment in the form of allowance "in kind" is only accepted in line with ILO specifications	
Does the company assess the pay gap accurately, and work progressively towards the payment of a living wage that is sufficient to afford a decent standard of living for the workers and their families?	
Does the company reflect the skills, responsibility, seniority, and education of workers in their level of wages?	
Does the company, where a pay rate for production, quota or piece work, is established, allow workers to earn at least a wage which respectively meets or exceeds applicable legal minimum wages, industry standards, or collective bargaining agreements (where applicable) within standard working hours?	
Does the company ensure that workers of all genders and categories, such as migrant and local workers, receive the same remuneration for equal jobs and qualification?	
Does the company implement deductions only under the conditions and to the extent allowed by law or fixed by collective agreement?	
Does the company provide the workers with the social benefits that are legally granted, such as without negative impact on their pay, level of seniority, position, or promotion prospects?	



## Decent Working Hours

Question	Answer
Can the company ensure that workers are not required to work more than 48 standard hours per week, without prejudice to the specific expectations set out hereunder? Exceptions specified by the ILO are recognized	
Does the company interpret applicable national legislation, industry benchmark standards or collective agreements within the international framework set out by the ILO, and promote working hour practices that enable a healthy work-life balance for the workers?	
Does the company only exceed the limit of hours described above in line with exceptional cases defined by the ILO, in which case overtime is permitted?	
Does the company use overtime as an exceptional and voluntary practice, paid at a premium rate of minimum 125% of the standard rate? Overtime shall not represent a significantly higher likelihood of occupational hazards, and in no circumstance go the limits defined under national legislation	
Does the company grant their workers the right to resting breaks in every working day and the right to at least one day off in every seven days, unless exceptions defined by collective agreements apply?	



## Occupational Health and Safety

Question	Answer
Does the company have a ISO 45001 or similar accreditation? If so, please attach a copy	
Does the company respect the right to healthy working and living conditions of workers and local communities, without prejudice to the specific expectations set out hereunder. Vulnerable persons, such as - but not limited to - young workers, new and expecting mothers and persons with disabilities, shall receive special protection?	
Does the company comply with national occupational health and safety legislation, or with international standards where national legislation is weak or poorly enforced?	
Does the company ensure that there are systems in place to assess, identify, prevent, and mitigate potential and actual threats to the health and safety of workers?	
Does the company train all departments and individuals on occupational health and safety regularly throughout all stages of employment, and provide information on potential occupational health and safety risks to workers and public, including affected communities?	
Does the company take effective measures to prevent workers from having accidents, injuries, or illnesses, arising from, associated with, or occurring during work. These measures aim at minimizing, so far as is reasonable, the causes of hazards inherent within the workplace?	
Does the company seek improving workers' protection in case of accident, including through compulsory insurance schemes?	
Does the company maintain records of all health and safety incidents in the workplace and all other facilities that are provided or mandated?	
Does the company take all appropriate measures, and obtain all relevant licenses and documentation required by national legislation, to see to the stability and safety of the equipment and buildings they use, as well as to protect against and prepare for any foreseeable emergency?	



<p>This includes residential facilities for workers when these are provided or mandated by the employer or a recruitment partner</p>	
<p>Has the company established relevant committees, such as an Occupational Health and Safety Committee, to ensure active co-operation between management and workers, and/or their representatives for the development and effective implementation of systems that ensure a safe and healthy work environment. These committees aim to represent the diversity of the workers?</p>	
<p>Does the company provide awareness to workers, and respect their right and responsibility to exit the premises and/or stop working without seeking permission in dangerous situations and uncontrolled hazards?</p>	
<p>Does the company provide adequate occupational medical assistance and related facilities and provide equal access to all workers for these services? Health services (including insurance) should serve the distinctive concerns and needs of all genders and ages</p>	
<p>Does the company provide access to safe and clean drinking water, and eating and resting areas free of charge, and where applicable, provide access to cooking and food storage areas?</p>	
<p>Does the company provide an adequate number of safe, separate toilets with adequate level of privacy for all genders, and paper towels and washbasins with hand soap in all work areas?</p>	
<p>Does the company ensure that when residential facilities are provided or mandated, they are clean and safe, and they meet all the basic needs of the workers?</p>	
<p>Does the company provide effective and tailored Personal Protective Equipment (PPE) to all workers free of charge, taking the needs of different worker categories, such as pregnant and nursing women, into consideration?</p>	
<p>Does the company compensate the damages incurred to the workers on the occasion that historical or actual failure of adherence to principles is identified?</p>	



Has the company had any legal actions or convictions for breaches of Health and Safety legislation in the past 3 years?	
Has the company had any fatalities in the last 3 years? If so, please give details	

## No Child Labour

Question	Answer
Can the company confirm that they do not employ, directly or indirectly, children below the minimum age of completion of compulsory schooling as defined by law, which shall not be less than 15 years, unless the exceptions recognised by the ILO apply?	
Does the company protect children from any form of exploitation?	
Does the company apply robust age-verification mechanisms as part of the recruitment process, which may not be in any way degrading or disrespectful to the worker?	

## Special Protection for Young Workers

Question	Answer
Does the company ensure that young persons do not work at night and that they are protected against conditions of work which are prejudicial to their health, safety, morals, and development, without prejudice to the specific expectations set out in this principle?	
Does the company remove young workers from any hazardous work or source of hazard immediately when such cases are identified, and redefine their scope of work without any loss of income?	
Does the company ensure that (a) the kind of work is not likely to be harmful to young workers' health or development; (b) their working	



hours allow their attendance in school, their participation in vocational orientation approved by the competent authority or their capacity to benefit from training or instruction programs?	
Does the company set the necessary mechanisms to prevent, identify and mitigate harm to young workers, with special attention to the provision and access of young workers to effective operational grievance mechanisms and to Occupational Health and Safety trainings schemes and programmes specific to the needs of young workers?	

## No Precarious Employment

Question	Answer
Does the company ensure that, their recruitment process and employment relationships do not cause insecurity and social or economic vulnerability for their workers?	
Does the company ensure that work is performed on the basis of a recognized and documented employment relationship, established in compliance with relevant national legislations, custom or practice, and international labour standards, whichever provides greater protection?	
Does the company, before entering employment, provide workers with understandable information in their own language and ensure that they are aware about their rights, responsibilities, and employment conditions, including working hours, remuneration and terms of payment in their own language?	
Does the company aim at providing decent, and where relevant, flexible working conditions that also support workers, irrespective of gender, in their roles as parents or caregivers, including migrant and seasonal workers whose children may be left in their hometowns?	
Can the company confirm that it does not use employment arrangements in a way that deliberately does not correspond to the genuine purpose of the law? This includes - but is not limited to - (a) apprenticeship or training schemes where there is no intent to impart skills	



or provide regular employment, (b) seasonality or contingency work when used to undermine workers' protection, (c) labour-only contracting, and d) contract substitution	
Can the company confirm that it does not use subcontracting in a way that undermines the rights of workers?	

### No Bonded, Forced Labour or Human Trafficking

Question	Answer
Can the company confirm that they do not engage in, or through business partners, be complicit to, any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, including state-imposed forced labour?	
Does the company adhere to international principles of responsible recruitment, including the Employer Pays Principle, and require the same from their recruitment partners, when engaging and recruiting all workers, either directly or indirectly, especially members of vulnerable groups such as temporary and migrant workers? As a minimum, this includes: <ul style="list-style-type: none"><li>▪ No recruitment fees and costs are charged to workers</li><li>▪ Clear and transparent employment contracts</li><li>▪ Workers' freedom from deception and coercion</li><li>▪ Freedom of movement and no retention of identity documents</li><li>▪ Access to free, comprehensive, and accurate information</li><li>▪ Freedom to terminate contract, change employer, and safely return</li><li>▪ Access to free dispute resolution and effective remedies</li></ul>	



## Grievance mechanism

Question	Answer
<p>Does the company have an effective operational-level grievance mechanisms for individuals and communities? And do they maintain accurate records? The operational-level grievance mechanism must be in line with UNGP Article 31. Where relevant (e.g. when a migrant worker population is present), the operational-level grievance mechanism should be accessible in relevant local languages, and should allow to address and remedy the issues effectively across jurisdictions through partnerships and coordination.</p>	

## Environment

Question	Answer
<p>Does the company have an Environmental Policy? If so, please attach a copy</p>	
<p>Does the company have a ISO14001 or other environmental accreditation? If so, please attach a copy</p>	
<p>Does the company comply with national environmental legislation? (or with international standards where national legislation is weak or poorly enforced)</p>	
<p>Can the company confirm that they do not use conflict materials as described by the European Conflict Mineral Regulation?</p>	
<p>What are the most significant Environmental impacts of the company's business (on the surrounding communities, natural resources, climate, and the overall environment) and how are they measured and controlled?</p>	
<p>In case of water intensive processes, please add the company's water management plan and targets</p>	
<p>Please attach scope 1, 2 and 3 yearly carbon emission numbers, targets and lists of actions per scope from the year 2020 onwards</p>	





Share the carbon impact of all products that Heras buys and the carbon impact of improvements for the next 5 years	
Share Life Cycle Analyses (LCA), Environmental Product Declaration (EPD) and/or Product Environmental Footprint (PEF) if they are available	
Share recent Environmental training examples employees have received	
Has the company had any significant environmental incidents in the past 3 years? If so, please attach specifics (incl. root-cause analysis and actions)	

## Governance

Question	Answer
Does the company have an Anti-Bribery & Corruption Policy? If so, please attach a copy	
Does the company comply with all relevant local and international anti-bribery & anti-corruption legislation?	
Has the company ever been sanctioned for any bribery or corruption offence? If so please give details	
Can the company confirm that they never took part in any act of corruption, extortion or embezzlement, nor in any form of bribery - including but not limited to - the promising, offering, giving or accepting of any improper monetary or other incentive?	
Has the company developed and adopted adequate internal controls, programmes or measures for preventing and detecting corruption, extortion, embezzlement or any form of bribery, developed on the basis of a company-specific risk assessment? If so, please give details?	
Does the company keep accurate information regarding their activities, structure and performance, and disclose these in accordance with applicable regulations and industry benchmark practices to enhance transparency of their activities?	
Can the company confirm it has never falsified, or participate in falsifying any information or in any act of misrepresentation in the supply chain?	



Does the company provide awareness to the workers about the policies, controls, programs and measures against unethical behavior, and promote compliance within the company through trainings and communication? If so, please attach a recent example	
Does the company collect, use, and otherwise process personal information (including that from workers, business partners, customers and consumers in their sphere of influence) with reasonable care. The collection, use and other processing of personal information must comply with privacy and information security laws and regulatory requirements?	

## Value chain

Question	Answer
Please give an (schematic) overview of your supply chain of the products Heras buys. At least the tier 1 supplier(s)	
Do you have an own Supplier Code of Conduct which you share with your suppliers? If so, please add a signed example(s) from suppliers in our value chain (at least the tier 1 supplier(s))	
Do you work together with partners in your value stream to improve ESG topics? If so, please attach written examples	

Published by	Heras Group
Contact person	Operations Director
Application / Verspreid onder	All employees
Classification	Public
Regulators	Supervisor Board
Version	V_1.1
Approved by	Exco
Next revision	Q1 2026

