



FEDRUS
International

The Fedrus International Code of Conduct



Contents

Table of contents

• Message from our chairman	5
• Our values and mission	7
• Our commitments	11
- Business ethics	13
- Working together	19
- Compliance	23

All mentioned policies in the Code of Conduct are available on the Fedrusnet.





Dear colleague,

At Fedrus International we are committed to being the preferred partner for the roof and façade professionals, centered around high added-value, sustainable long-life cycle products and best-in-class service offering. We relentlessly seek new ways to improve how we operate. In doing so, our values function as a compass for all our employees. They form a solid basis for our decisions and guide us in our daily activities and should therefore be fully adhered to and being embraced by all of us. The Fedrus Code of Conduct is our guidebook for putting values into practice and applies to all entities of the group (VM Building Solutions, APOK, Plastivan, Heli Group). It sets out a clear standard of conduct to ensure that we always make the right choice, providing a framework of do's and don'ts. It is a document which protects Fedrus group and each of us and will help us to have the right behaviour in our relationship with all stakeholders along our value chain, being it colleagues, customers, suppliers, authorities, environment,...

Working together in a zero harm work environment will enable us to build sustainable growth, create value for all our stakeholders and collectively contribute to building tomorrow and building the future.

Read and re-read our Code of Conduct.
It matters.

Best regards,
Mark Vandecruys
Chairman

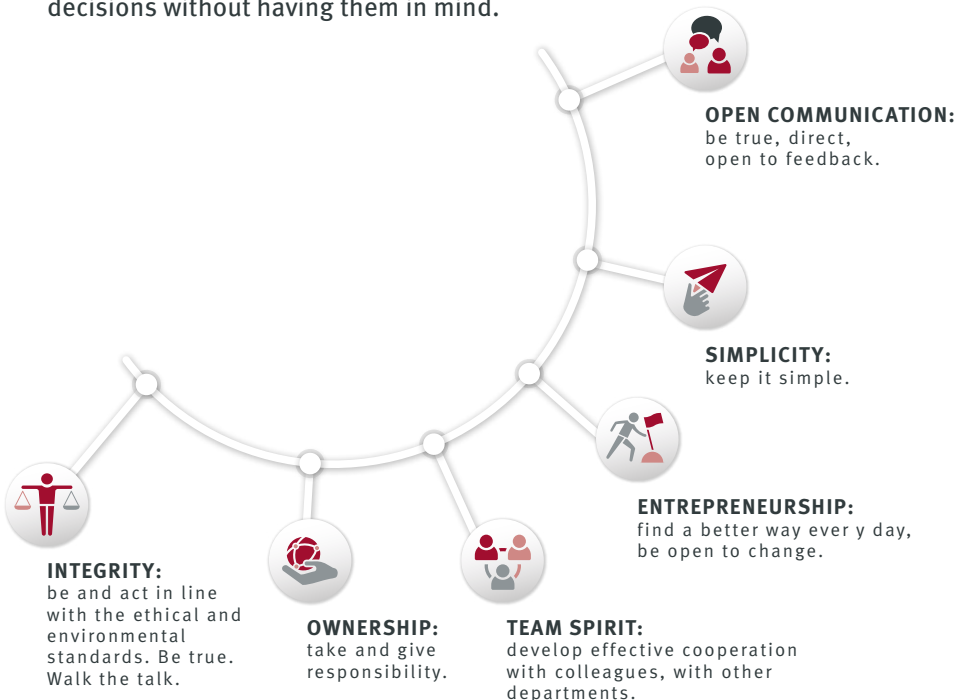


Our values

Our company values are the beliefs and principles that drive our business.

They impact our employee experience as well as the relationship we develop with customers, suppliers, and all stakeholders.

These values are our company's DNA, and they help us differentiate our business from the competition. That is why we cannot make business decisions without having them in mind.







Our mission

Being the preferred partner
for the roof and façade
professional.

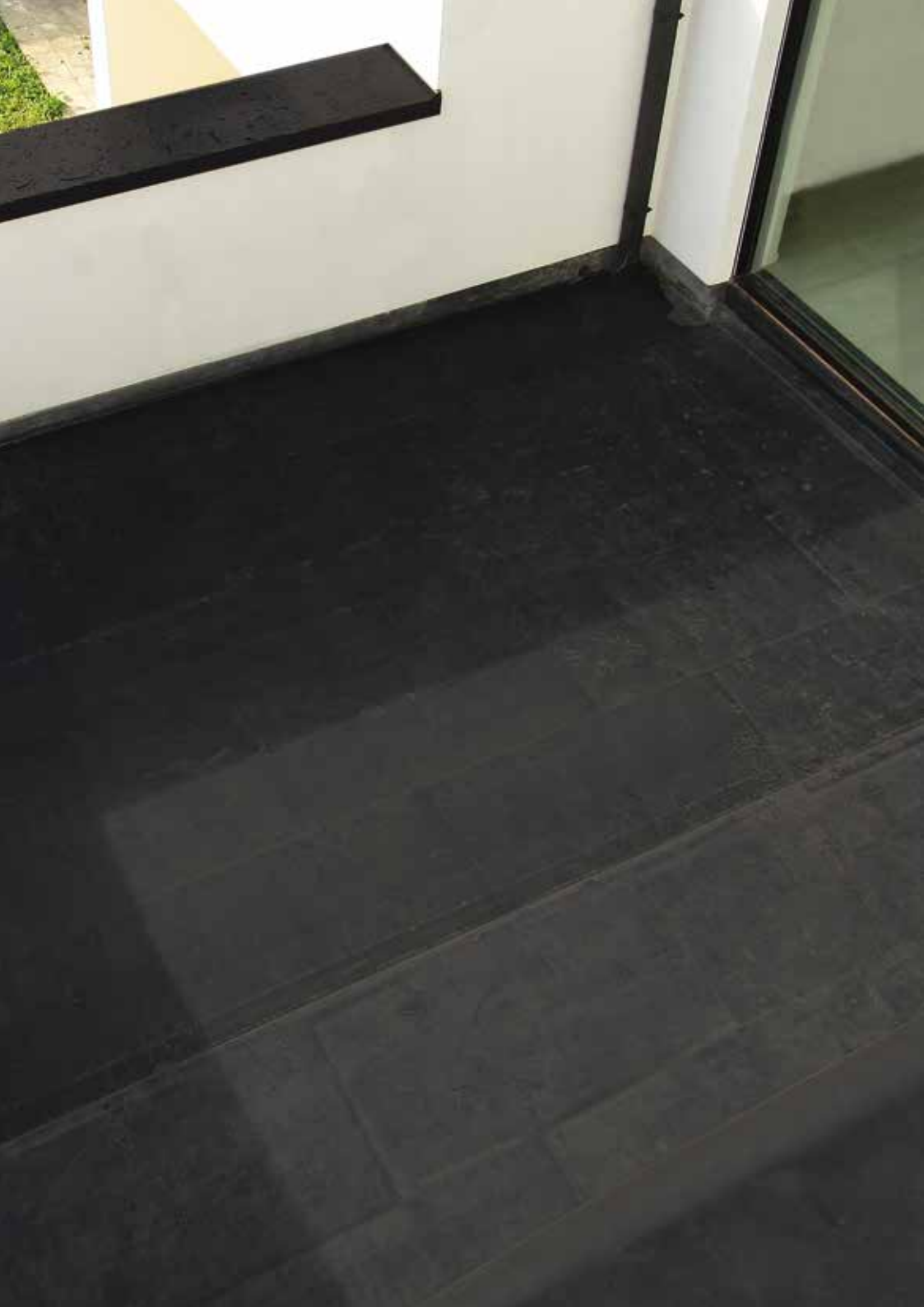
“
**Our mission
and values,
that is what
keeps us
together.”**

Our commitments

Every employee is expected to act in accordance with our corporate values and to comply with all applicable laws and regulations, company policies and guidelines of this Code of Conduct in the course of their daily work activities.

All elements of the Code of Conduct are here to guide you all, irrespective of your specific job or your location in the world, in practicing the highest standards of business conduct and ethics that we uphold as a group.

We are committed to apply the principles of the Fedrus Code of Conduct. The Code explains our commitments and expectations towards stakeholders and provides guidance for all employees.



Our commitments

Business ethics

- Compliance with laws and regulations

We comply with the laws and regulations of the countries and regions in which we operate. When the Fedrus Code of Conduct specifies standards that are more stringent than applicable laws and regulations, such standards shall apply.

- Conflict of interest

We avoid personal activities, financial and non-financial interests which could conflict with our responsibilities to Fedrus. We do not seek to gain through misuse of our position.

Any actual or potential conflict of interest must be promptly reported to your supervising manager. All colleagues combining their Fedrus employment with another professional activity shall obtain prior approval from the management.

We hereby refer to the Fedrus Procurement policy in place.

- Anti-bribery

Fedrus has a zero tolerance for all forms of bribery and corruption.

Therefore, we don't solicit, accept, offer, promise, or pay bribes, whether directly or through a third party. This applies to all Fedrus operations, regardless of local business practices and prohibits both public and commercial bribery.

Our commitments

We need to be aware that a bribe is not only payment or receipt of cash, but anything of value such as travel, hospitality, entertainment, gifts, ... All types of gifts or favours that are offered or that we foresee to provide must always be reported upfront to your supervising manager for approval.

We hereby refer to the Fedrus Procurement policy in place.

- **Anti-money laundering**

We apply zero-tolerance towards money-laundering, therefore we must be vigilant regarding all payments made or received as part of the company's activity.

- **Fair competition**

Employees and representatives of Fedrus shall fully comply with the antitrust and competition laws that apply in our relationships with customers, suppliers, competitors or other stakeholders to ensure that Fedrus upholds fair competition.



Our commitments

- **Delegation of authority**

Employees and representatives of Fedrus should not bind the company beyond the powers and authorisations granted to them and should be cautious as to the scope of their authority.

We hereby refer to the Fedrus Authorization Matrix in place.

- **Accurate records and accounting**

The financial reports and other information that Fedrus provides to shareholders, regulators and other stakeholders must be accurate and complete. We therefore apply procedures and processes to ensure that underlying transactions are properly authorized, accurately recorded and reported in line with laws and regulations.

- **Personal data & privacy**

We respect applicable data protection and privacy rights laws with regards to personal data of other employees, applicants, customers, suppliers, partners, and all other individuals whose personal data are collected and processed by Fedrus.

We hereby refer to the Fedrus GDPR policies & Privacy policies in place.

Our commitments

- Confidential information

Maintaining confidentiality on sensitive business information, including technical and other information, is crucial for our organization. Confidential information means any information that is specific to or owned by Fedrus and that is not or not yet publicly available, and other information that we possess where we are bound by confidentiality. All employees and the representatives of Fedrus must take care to protect confidential information, not disclose it to unauthorized parties, whether inside or outside the organization. The obligation of confidentiality continues even after the end of the employment relationship.

- Responsible Sourcing & Sustainable development

Fedrus believes that high standards of social and environmental behaviour are essential in doing business. To demonstrate Fedrus' commitment to being a responsible corporate group, we support the 10 principles of the UN Global Compact. Fedrus expects that every representative acting on its behalf, its suppliers and its business partners adhere to these principles.

Our commitments

- Protection of the environment

Fedrus is committed to optimise the use of resources in its products and industrial processes, reducing its impact on the environment, and strengthening its environmental management system to contribute to a better environment for future generations.

Fedrus' strong commitment on minimizing the impact of its activities on the environment is reflected in the ISO 14001 certification of its zinc production sites in France, the life cycle assessment of its products and the eco-design of its new products.





Our commitments

Working together

- How do we treat each other & our business partners?

We recognize the existence of different values and cultural standards in the countries in which we operate. We foster working environments that are fair and safe, where rights are respected, and everyone can achieve their full potential. We behave in a professional manner and treat each other and our business partners with respect, dignity, honesty, and fairness. We do not tolerate any form of harassment, discrimination, violence, threatening, or other disruptive behaviour. We embrace the diversity of people, and respect people for who they are and what they bring. We integrate the 10 principles of the UN Global Compact and the Fedrus values in our way of working together, in relation to our colleagues and to our customers, suppliers, partners, competitors and public authorities.

- Health & safety

Fedrus is committed to provide healthy and safe working conditions, in compliance with health and safety legislation.

It is our individual and shared responsibility to respect the health and safety policies and prevention modes. We encourage a healthy work-life balance.



Our commitments

- Talent & skills development

Fedrus promotes a culture that cares about continuous learning and fosters professional growth, by creating opportunities to support personal development and career progression, via yearly performance reviews and talent development.

- Social dialogue

Fedrus strives for fair, transparent, and constructive relations with our employees and their representatives. We respect the right of employees to form and join trade unions and to enter into collective bargaining agreements. Workers' representatives shall be guaranteed the exercise of their professional activity and their mandate.

- Use of information technology

We use all information and electronic communication technology at Fedrus responsibly, securely and for professional use and for limited, reasonable private purpose provided however that such private use does not impact Fedrus' network security or productivity. We protect our IT equipment, IT information and systems from damage or theft.

We follow the appropriate request process to install any software or applications on the Fedrus equipment and comply with the password guidelines and other principles that are included in our IT charter and in our on- and offboarding policy.

We hereby refer to the Fedrus IT charter and onboarding & offboarding policy in place.

Our commitments

- Safeguarding assets

We are all responsible for using and maintaining all Fedrus assets with care and respect, while avoiding waste and abuse.

The use of Fedrus' time, materials, financial assets, intellectual property rights or facilities for purposes not directly related to the business is prohibited without authorizations. The same applies to the removal and/or the borrowing of Fedrus' assets without permission.

- External communication

Communication with external parties must be carefully managed.

To ensure a consistent and coordinated communication, general enquiries about Fedrus or its employees, as well as all media enquiries, should be directed to the corporate communications department. We are careful about what we share online, protecting our company's reputation but also protecting ourselves.



Our commitments

- **Speak up**

Each of us, at whatever level or in whatever role, has the responsibility to speak up when faced with behaviour or a situation that seems wrong or in violation with this Code.

By speaking up when something seems wrong, we show integrity and the courage to do the right thing. Speaking up helps to prevent mistakes and misconduct and protects our Fedrus community.

By speaking up, we show that we care about each other, our company, and our stakeholders.

You can contact on a confidential base our colleague in charge of compliance matters at compliance@fedrusinternational.com



Our commitments

Compliance

Questions, concerns, and or violations can be reported in your preferred language to:

- your supervisor
- your HR manager
- compliance@fedrusinternational.com

Compliance with the Code of Conduct is everybody's responsibility. Employees will not be disadvantaged in any way for reporting a suspected breach of this Code. Each report will be taken seriously and shall be handled confidentially according to due process. In case of breach, appropriate measures will be taken.

Addressing and resolving ethical dilemmas is complex. Therefore, we will be at your side to implement it on a daily basis and open for dialogue.

The Group Management Committee



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