

SUSTAINABILITY CODE OF CONDUCT

This Code of Conduct for Suppliers and Contractors of Invest International is a specific clarification of the Invest International business principles and the OECD Guidelines, and acceptance is mandatory when contracting as Supplier or Contractor for Invest International. This set of guidelines for Suppliers and Contractors (hereafter referred to as 'Suppliers') is not exhaustive but rather serves as a guide for the focus areas.

One of the important items of the OECD guidelines concerns responsible supply chain management. Therefore, Invest International expects of its Suppliers not only to ensure compliance towards responsible supply chain management within their own organization, but also to safeguard high standards further up- or downstream the supply chain.

In the selection of our Suppliers and outsourcing partners, the level of compliance and adherence to the Code of Conduct will be considered when making our final selection.

Suppliers declare, in the Self-assessment form, that they have not engaged, or will engage, directly or indirectly, in bribery or any other illegal, corrupt, fraudulent, collusive, coercive, or obstructive practices in connection with the tendering process or execution or supply of any works, goods or services for the assignment. And they shall demand from their consortium partners, agents, sub-consultants, sub-contractors, service providers, Suppliers or/and their personnel to equally declare this.

1. Laws and legislation

Suppliers must comply with all applicable international, national and local laws, particularly those concerning hazardous substances, environmental performance, labor conditions and work facilities and must be in possession of all required permits. Suppliers must comply with local industry standards if these are more stringent than local statutory regulations.

2. Supplier relations and supply chain responsibility

Invest International expects its (1st and 2nd tier) Suppliers to adopt a proactive attitude and take an innovative approach, when possible, in improving the social, environmental, and ethical aspects regarding the goods or services they provide.

Suppliers expressly take their responsibility for the supply chain and map out sustainability risks. Invest International firmly believes that compliance with International Environmental and Social standards serves both its own interests and those of its Suppliers, as they improve the continuity and success of our business operations in the long term.

Suppliers must declare that during the execution of the contract they shall observe and adhere to:

- (a) **the OECD Guidelines for Multinational Enterprises (2011 edition)**
- (b) **the IFC Performance Standards on Environmental and Social Sustainability (2012 edition)**

3. Agents, sub-Suppliers, and sub-Contractors

In most cases, agents are likely to work with sub-Suppliers and sub-Contractors; this represents an additional step that renders the link between Invest International and any risks affecting Invest International less manageable. Nevertheless, Invest International holds the view that involving an agent does not affect its own responsibility for risks and regulation, and Suppliers remain accountable for supply chain risks occurring further up and downstream.

4. ESG requirements

4.1 Non-compliance

Insofar as Suppliers are not (yet) able to comply with the provisions of this Code of Conduct, Invest International will discuss with them what measures are necessary to ensure compliance soon. Invest International strives to work together with its Suppliers to raise awareness of their Corporate Responsibility performance. Invest International will point out its Suppliers on methods for sustainable procurement to realize the desired sustainability of the supply chain. In the event of one of the following circumstances, Invest International has the right to immediately unilaterally terminate the contract signed by the two parties or/and cancel the unexecuted order or/and refuse to pay or pay other forms of compensation:

1. Suppliers have seriously violated National and local laws or industry standards;
2. Upon request by Invest International, Suppliers refuse to provide Invest International with free, accurate and complete information related to this Code of Conduct;
3. Suppliers or their employees bribe or accept bribes;
4. Suppliers fail to report transactions or relationships that will cause/may lead to conflicts of interest promptly, accurately and completely;
5. Suppliers recruit child labor illegally or other violations of labor laws and regulations;
6. Suppliers illegally discharge pollutants or other acts that violate environmental laws and regulations.

4.2 Ethical conduct

It is not permitted to offer or accept bribes to secure or grant contracts, services, financial or other benefits. Any attempt at, or opportunity for, bribery must be immediately rejected and reported. It is not permitted to reward employees of Invest International or offer them gifts or entertainment if, by accepting these offerings, they might give the impression of entering obligations. Employees of Invest International or people representing Invest International are not allowed to benefit themselves from business opportunities that have fallen to Invest International.

4.3 Working conditions

Invest International expects all its Suppliers to honor fundamental human rights. Suppliers are required to treat all employees with dignity and respect. Invest International wishes to only conduct business with Suppliers that honor the rights of employees, that are set out in the OECD Guidelines.

4.4 Freedom of employment/humane treatment

Invest International rejects all forms of forced, bonded, and indentured labor, and Suppliers are prohibited from using forced, bonded or indentured labor or involuntary prison labor. Employees may not be required to pay a security deposit or submit their identity documents to their employer, and must have the freedom to leave their employer, provided they give the appropriate notice. Physical or psychological abuse and disciplinary action, threats of physical violence, sexual and other violence, along with verbal abuse and other forms of intimidation are not permitted. All disciplinary measures must be documented.

4.5 Fair payment

The wages and benefits for a standard working week are at least in accordance with the applicable national standard or to the standard agreed by industry if this is higher. The wages for a standard working week (excluding overtime) should preferably be sufficient to cover employees' basic needs and guarantee a certain amount in disposable income. Prior to commencing employment, all employees must be provided with comprehensible written information regarding their wages under employment law and must subsequently receive a pay slip for each payment for the period in question. It is not permitted for employers to dock employees' wages as a disciplinary measure unless this is permitted under national law. Any other deductions not provided for under national law are permitted only with the express consent of the employee concerned.

4.6 Working hours and overtime

Working hours must comply with national laws or with general industry standards if these provide more protection. Under no circumstances can employees be required to consistently work more than 48 hours a week, and they must receive at least one day off for each period of an average of seven days. Overtime is performed on a voluntary basis.

5 Discrimination

Suppliers are required to treat their employees equally in their employment and profession and ensure that they all have equal opportunities. Suppliers must pay employees in similar positions equal pay for equal work. No form of intimidation or discrimination is permitted regarding employment (i.e. hiring, compensation, training opportunities, promotion, termination, retirement, etc.) and profession, including discrimination based on race, caste, national origin or socioeconomic background, skin color, sex, marital status, age, disability, sexual orientation, union membership, language, religion, political convictions, ownership, birth, pregnancy or otherwise.

6 Regular employment and employment contract

All work is performed based on a recognized employment contract drafted in compliance with national laws and practices. Suppliers are not permitted to evade their obligations towards employees in relation to laws and regulations regarding employment and social security arising from the regular employment contract, either by only purchasing external labor or through outsourcing or teleworking contracts or based on learning programs without the actual intention of teaching skills or offering regular employment. Suppliers are likewise not permitted to evade such obligations by relying excessively on fixed-term employment contracts.

7 Health and safety at production and office sites

Invest International sets strict requirements for its Suppliers regarding their employee health and safety policy. Suppliers are required to provide their employees with a safe, clean, and healthy workplace that complies with all applicable local, national, and international laws and regulations, considering the relevant expertise within the industry and any specific dangers involved.

8 CO2 emissions

Suppliers must make a consistent effort to reduce the consumption of fossil fuels (such as gas, oil, coals, diesel, etc.), reducing electricity consumption and stimulating energy generation based on renewable sources (e.g. biogas, tides, hydropower, wind power, solar energy, etc.) to limit CO2 emissions to the lowest level that is reasonably achievable. This includes efforts to reduce emissions for transportation in the development of the assignment or provision of goods.

For transport services (including sub-Contractors driving on behalf of Invest International), Suppliers must opt for the most fuel-efficient and least environmentally damaging mode of transport available, provided this is economically feasible.

9 Transparency

Invest International expects its Suppliers to be transparent regarding their Corporate Social Responsibility (CSR) policy and activities. Sound reporting on CSR efforts enables stakeholders to enter a dialogue with the Supplier and allows the Supplier to improve itself through the constructive criticism of its stakeholders.

10 Information and reports

Suppliers must provide a Self-assessment from the start of the assignment and report on three yearly bases concerning ESG (Environmental, Social, and Governance) performance and ambition. Suppliers must provide Invest International with this information free of charge regarding their performance in all areas specified in this Code of Conduct for Suppliers and Contractors (e.g. of the production facilities at which individual orders are fulfilled). Suppliers must guarantee the accuracy and completeness of the information provided.

All documents must be consulted to monitor this compliance is available from the Suppliers, including test reports, internal-control reports, inspection reports, and proof of other relevant measures.

Invest International protects information and properties received from third parties and expects its Suppliers to do the same regarding information and properties they receive from third parties.

Let's build the sustainable markets of tomorrow together.

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