

# PL.LB.006

## SUPPLIER CODE OF CONDUCT (SCoC)

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	COP Dora Caria	27-01-2025	Head of Legal Pauline Matveeff Head of Sustainability Keshav Parajuly	15-02-2025	COP Dora Caria	20-02-2025
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## **BACKGROUND**

At Landbell Group, we acknowledge that sustainability impacts go beyond our boundaries and are related to environmental and social topics across our entire value chain. Most impacts are embedded into our waste management services. As we offer these services with the help of our suppliers, their performance directly influences our impacts.

Landbell Group suppliers are expected to conduct their business in a manner which embraces sustainability, considering and when possible minimizing the negative impacts of their operations and of their supply chain.

### **Objective**

This Supplier Code of Conduct (SCoC) sets the minimum requirements for working with us. All Landbell Group waste management related suppliers shall acknowledge and adhere to this SCoC.

### **Monitoring**

The supplier shall secure, for Landbell Group or third-party auditors it may appoint, the right to review all tiers of sub-contractors, and shall cooperate with the Landbell Group on the review process in good faith. Such reviews may include audits, visits of facilities and locations of suppliers and subcontractors, confidential interviews with their employees, and review of related documentation.

### **Awareness of this Code**

The supplier is expected to cascade down the requirements in this SCoC to its employees, subcontractors in a clear and intelligible manner in a language that they can understand.

### **Contact**

For any inquiries related to this SCoC and its execution, suppliers are encouraged to reach out to their designated contact person within the Landbell Group.

## BUSINESS ETHICS

### Business Conduct

- The Supplier shall comply with any laws<sup>1</sup> applicable to supplier or to the services provided to Landbell Group (which may include domestic, foreign or supranational rules as well as United Nations' and other international recognized organisations' conventions).
- The supplier shall meet the fundamental principles of ethical and responsible business conduct. These include transparency and fairness in business dealings and activities, accurate financial and performance disclosures, fiscal integrity, environmental and labour practices, and management of business-related risks.
- The supplier shall report to Landbell Group any sanction they receive, immediately upon reception.
- The supplier shall neither perform nor tolerate any falsification of records.

### Anti-corruption and Bribery

- The supplier shall prohibit any form of corruption, embezzlement, facilitating payments, or bribery. This includes generally or any activity of promising, giving or accepting any monetary or other advantage to improperly influence any decision or otherwise gain any improper advantage, for itself or others, for example for obtaining or retaining business or administrative authorisations.
- The supplier shall enforce procedures, including prevention of conflict of interests, to prevent any of these criminal activities, especially but not only in relation to environmental crime such as waste mismanagement.

### Free Competition

- The supplier shall compete fairly and not engage into any anti-competitive behaviour, such as cartels, collusions, price-fixing, price discrimination or predatory pricing.

### Data and Information Management

- The supplier shall hold confidential and safe any information it received from Landbell Group or its customers, including but not limited to, commercially sensitive information, know-how, database or intellectual property. It shall take all appropriate security measures to prevent its unauthorised use or disclosure.
- The supplier shall only use confidential information for the purpose expressly authorized by Landbell Group.

### Concern Raising and Whistleblowing

- The supplier shall put in place a mechanism and process through which employees, subcontractors and third parties can anonymously share their concerns and complaints, safeguarding their security and privacy rights.
- The supplier must refrain from any retaliation, penalisation or any adverse consequences on whistleblowers, or persons raising an alert in good faith.

### External Communications

- Supplier shall not communicate or engage on behalf of Landbell Group unless expressly requested in writing and in advance by Landbell Group. This applies to any external, formal, and informal communications, including communications on social media platforms and any use of Landbell Group's proprietary trademarks.

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<sup>1</sup> When and where, the content of this SCoC conflicts with any local, national or international laws, regulations and provisions applicable at the location where service is provided, those shall prevail, unless the SCoC is stricter.

## LABOUR AND HUMAN RIGHTS

### Forced Labor, Modern Slavery and Human Trafficking

- The supplier shall never use and tolerate coercive, exploitative labour or any form of labour not based on free and informed consent.
- The supplier shall act diligently to identify, prevent, and cease any form of modern slavery in its supply chain, including indentured, bonded, enslaved or any other form of forced labour and human trafficking.

### Child Labor

- The supplier shall not allow anyone to work under the age of 15, except students following an internship program, holiday work or apprentices.
- The supplier shall ensure that juvenile work, of persons below 18, is not impairing the worker's physical and mental development.

### Employment Conditions, Wages and Benefits

- The supplier shall employ workers under fair working conditions, which promote their well-being.
- The supplier shall ensure the existence of direct written labour agreements for all its employees, throughout the employment duration, detailing both duties and rights/benefits, in a language they understand.
- The supplier shall employ workers under fair wages compliant with legal minimum wages.
- The supplier shall pay wages regularly and in full (including overtime compensation).
- The supplier shall not use wage deductions as a disciplinary measure.

### Working Hours

- The supplier shall ensure that regular working hours do not exceed 50 hours per week on a regular basis or 60 hours, including overtime.
- The supplier shall allow all workers sufficient rest time and to take at least one day off every seven days, as well as provide holidays and leaves.

### Occupational Health and Safety (OHS)

- The supplier shall promote a safe and healthy work environment.
- The supplier shall avoid or reduce, as much as feasible, exposure to OHS risks, including work-related accidents, injury, and illness, by implementing a thorough identification, assessment and mitigation process, reviewed regularly.
- The supplier shall ensure all workers have adequate OHS information and training, in language they can understand.

### Freedom of Association and Collective Bargaining

- The supplier shall respect employees' rights to form and join trade unions of their choosing, to engage in peaceful assembly, and to go on strike, or the right of the employees to refrain from such activities, without fear of any sort of retaliation, including discrimination, intimidation, or harassment.

### Non-Discrimination

- The supplier shall maintain an inclusive working environment.
- The supplier shall provide equal hiring and employment conditions and not discriminate or harass individuals based on their race, skin colour, age, gender, sexual orientation, gender identity and expression, ethnicity, national origin, disability, pregnancy status, religion, political affiliation, union membership, or any other distinctive moral or physical characteristics.
- The supplier shall not tolerate any kind of offensive, demeaning, abusive or discriminating behaviour.

## ENVIRONMENT

### Environmental Responsibility

- The supplier shall identify and manage the negative environmental impacts of its operations and activities.
- The supplier acknowledges that environmental responsibility is an integral part of delivering waste management related services, and shall provide full transparency and documentation of waste/materials routes, flows and processing.
- The supplier shall hold and keep up to date all permits, approvals and registrations, as required, and applicable to its operations/sites, and abide by all their provisions including reporting requirements of emissions, performance and events to the relevant authorities.
- The supplier shall also ensure that all its subcontractors conforms to the above.

### Pollution Prevention

- The supplier shall ensure that emissions and discharges of pollutants to air, water or soil are minimized or eliminated at the source.

### Resource Consumption

- The supplier shall identify and safely manage all chemicals and other substances and replace them, as possible, with less environmentally impacting alternatives.
- The supplier must devote all efforts to preserve natural resources and minimize resource consumption such as energy, water, fossil fuels, minerals and material consumption.
- The supplier shall respect the waste management hierarchy, promoting reuse and recycling, while continuously improving its processes to reduce the quantity and hazardous nature of the remaining waste to be disposed.

### Climate Action

- The supplier shall undertake and develop its own decarbonization plan, committing to reduce its own emissions and encourage its subcontractors to do the same.
- The supplier shall, when requested and where relevant, report on Greenhouse Gas (GHG) emissions in its own operations and supply chain, and disclose then to the Landbell Group as well as any specific reduction achievement and improvement.

*Acknowledgement and Acceptance:*

<b>Supplier Name:</b>	
<b>Signed by:</b>	
<b>Title:</b>	
<b>Date:</b>	
<b>Signature:</b>	