

Manuchar

Manuchar Group Code of Conduct



Effective date: 15th of June, 2016.

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Introduction

Manuchar has formulated this Code of Conduct (hereafter CoC) in line with internationally recognized guidelines for generally accepted business standards.

Purpose of the Manuchar Code of Conduct

Manuchar CoC is part of our constant effort to maintain and strengthen trust among all our employees, suppliers, clients, business partners, government agencies and all other stakeholders. The objective of Manuchar CoC is to describe and disseminate our core values and operational standards. Furthermore, our CoC aims to support and set a basis for our Corporate Social Responsibility efforts.

Scope of application

Manuchar CoC describes the standards which are expected to be followed within Manuchar Group, meaning Manuchar NV and all companies over which it has sole or joint control.

Furthermore, we find it important that our business partners also recognize and respect the values and principles we highlight in our CoC. Our aim is to promote responsible and ethical supply chains, and therefore we encourage our suppliers and clients to do the same.

Ensuring compliance

It is management's responsibility to ensure that the Manuchar CoC is communicated and that its application is understood and taken seriously by all employees. Our Code of Conduct is accessible to all employees: it is given to each new member of the staff, and it is communicated and reinforced regularly to existing staff.

Each employee is encouraged to report any violation of this CoC to his or her direct supervisor, HRM Department or Legal Department. Any third party stakeholder may report such a violation to the HRM Department or the Legal Department¹. Full confidentiality and protection will be granted to those who report a breach of this CoC. Manuchar may determine sanctions and remedial actions against employees for violations of the requirements of this CoC.

Manuchar CoC will be reviewed on regular basis by the Manuchar Quality Department.

For complaints:

HRM Department or Legal Department

Rietschoorvelden 20
2170 Antwerp, BELGIUM
Tel:+32 3640 9302
Languages: EN, FR, NL, ES, DE

¹ **LEGAL DISCLAIMER** This CoC document describes our core values and our efforts to achieve and maintain them. While compliance with its provisions is mandatory within our organization, it is not intended to be construed, and cannot be construed, as conferring upon any third party stakeholder any benefit or the right to enforce any provision of this CoC, unless that provision would also be enforceable by application of law in the absence of this CoC. Notwithstanding the foregoing, any violation of this CoC reported to us by a third party stakeholder will be duly investigated and, if required, corrective actions will be taken.

Respect for colleagues, business partners and community

Obeying the law

At Manuchar, we are committed to complying with the laws and regulations of the countries in which we operate. We do not condone violation of any law by any person acting on behalf of Manuchar.

Respect for human rights

We conduct our operations with honesty and integrity; and furthermore, we uphold and respect the internationally proclaimed human rights of our employees, our business partners and the communities in which we operate.

Land rights of communities

Manuchar recognizes and respects the rights and title to property and land of individuals and local communities, including indigenous people. Negotiations with regard to their property or land, including the use of and transfers of it, adhere to the principles of informed consultation, contract transparency and disclosure. Manuchar rejects participation in land grabbing and conducts due diligence to avoid being party to any land grabbing.

Principles of employment

Freedom to choose employment

Manuchar tolerates no form of compulsory or forced labour, whether in the form of indentured labour, bonded labour or other forms. Mental and physical coercion, abuse, slavery and human trafficking are prohibited. No employee may be forced to work through intimidation, whether directly or indirectly.

Employees are not required to pay a fee in connection with obtaining employment. Furthermore, employees are not required to pay deposits in relation to their employment.

All Manuchar employees have a signed copy of their employment agreement and they are free to resign from their employment, provided they give notice and act in accordance with the national laws applicable to their employment contract and labour regulations.

Manuchar is committed to fulfilling all applicable labour and social insurance laws and regulations. At the same time, all Manuchar employees are expected to protect the integrity and the reputation of Manuchar.

Freedom of association

Manuchar respects the dignity of the individual and the right of employees to freedom of association, to form or join trade unions and/or worker's organizations of their choice. These trade unions and/or workers' organizations, may collectively express, promote, pursue and defend their common interests and collectively bargain with the employer in order to reach agreements that regulate working conditions.

No child labour

Manuchar forbids any form of child labour. We adhere to the minimum working age requirements in all countries in which we are present. The applicable definition of "child labour" is: workers either below the minimum age for employment established by law in the respective country, or below the age of 16 as a minimum.

Manuchar prohibits assigning young workers (under 18 years of age or as defined by local law) to hazardous work based on age limits and types of work (e.g. night work) as defined by local law.

Compensation and Working hours

Manuchar employees receive compensation that equals or exceeds the minimum amount prescribed by local or national law or any applicable industry-specific compensation agreement.

Manuchar aims to establish a living wage approach to fair compensation, which ensures the wages are sufficient to meet the basic needs of the worker and to provide some discretionary income.

The working hours and compensation for overtime hours (including maximum hour rules, meal and rest periods) of our employees are compliant with national laws and benchmark industry standards.

Manuchar informs its employees about the composition of their wages in a comprehensible way and with sufficient detail.

Equal opportunity and diversity

Manuchar attaches great value to, and respect for, the diversity of its employees. Manuchar prohibits any form of discrimination in hiring and employment practices, including any distinction, exclusion or preference based on race, caste, skin colour, gender, age, religious belief, political opinion, membership of workers' organizations, physical or mental disability, veteran or marital status, ethnic, national or social background, nationality, sexual orientation or other personal characteristic. Pregnancy testing or other forms of health screening that might result in discrimination are not carried out.

No harsh or inhuman treatment

Manuchar aims to create and maintain a working environment that is free from unlawful victimization and harassment and in which all employees are treated with dignity and respect. No Manuchar employee may be subjected to psychological, verbal, physical or sexual abuse, coercion or harassment.

Health and safety

Safe and hygienic working conditions

Manuchar continuously strives to ensure a safe and healthy working environment and to adopt the measures needed to prevent all such accidents and health hazards that may arise in connection with our employees' activities on Manuchar's behalf. The company supports continuous advancement of workplace health protection towards improvement of the working environment.

We are committed to acting in accordance with all relevant laws, regulations and industry standards concerning health and safety. Clean sanitary facilities, first aid medical supplies and access to clean drinking water are available in sufficient quantity at all Manuchar sites.

Safe and quality products and services

Manuchar is committed to supplying products and providing services that consistently offer value in terms of price and quality and that are safe for their ordinary use. We aim to meet at all times the contractual quality and safety expectations.

For further details, please refer to our Health and Safety policy.

Business Ethics policies

Anti-corruption policy

All of our employees must conduct themselves so as to avoid personal dependency, obligation or interference in doing business on Manuchar's behalf. Manuchar employees must not give, promise, offer, or receive anything of value to influence the behaviour of another business partner or government official in order to obtain an improper business benefit or advantage.

Accepting gifts and entertainment

The purpose of business entertainment and gifts in a commercial setting is to create goodwill and sound working relationships, not to gain unfair advantage with customers, vendors or other parties.

Where gifts are presented to or by Manuchar employees in line with a country's individual customs or etiquette, local management must ensure that such gifts do not give rise to further personal or business obligations and that applicable local and/or national regulations on business gifts are strictly observed.

Official company to company gift exchanges are acceptable but must be transparent and properly recorded. When applicable, Manuchar respects its business partners' policies on gifts.

Competition and anti-trust laws

Manuchar acknowledges the importance of fair market competition and is therefore committed to conducting its business in accordance with local competition laws and regulations in the countries and regions in which it operates. Manuchar's employees are expected to refrain at all times from any behaviour that would result in a violation of anti-trust/competition laws and regulations.

Confidential Information and Data Privacy

Manuchar employees may not disclose any of the company's confidential information nor use it unless for the purpose of carrying out their work for the company.

Manuchar also attaches great value to safeguarding the trade and company secrets of its customers and suppliers. Manuchar employees should respect any confidentiality agreements in force and should not use or disclose confidential information unless in accordance with those agreements, or if the information enters public domain, or when proper authorization has been granted. Manuchar employees to whom confidential information is disclosed should take reasonable measures to maintain confidentiality and avoid inadvertent disclosure of the information, and to use it solely for its intended and designated purpose.

Manuchar employees must not obtain confidential information of other parties by improper means. All and any personal information about individuals, such as suppliers, consumers or employees are handled with full respect for the protection of their privacy and for all relevant privacy laws and regulations.

Third Party Intellectual Property Rights

Manuchar employees should respect all third-party intellectual property rights and other intangible commercial rights belonging to others. No Manuchar employee should ever knowingly infringe upon these rights.

Protecting the Environment

At Manuchar, we are committed to protecting nature and the environment. We understand our environmental responsibilities and recognize our obligations to use resources responsibly and to reduce the impact of our business activities on the environment.

We strive to raise environmental awareness amongst our employees and to encourage them to become more environmentally responsible. Manuchar's employees are expected to comply with all locally and nationally applicable environmental regulations and to make an ongoing effort to minimize the environmental footprint of our operations. Please refer to our Environmental Policy for further details.

This Code of Conduct was approved by the Executive Committee on the 26th of February 2015 and effective as from 26th of March 2015.

Bart Troubleyn
Chief Operating Officer

Philippe Huybrechs
Chief Executive Officer