

SUPPLIER CODE OF CONDUCT

[●] – Eurofiber Group

VERSION: FEBRUARY - 2019

Introduction

Eurofiber owns and exploits fiber optic network in the Netherlands. Eurofiber has been the provider of an open digital infrastructure since 2000. Customers have complete freedom to choose the services, applications and providers they need. This allows our customers to tap into the full potential of digital innovation. The Dutch government has assigned Eurofiber the status of 'vital infrastructure'.

When conducting our company activities we will comply with all applicable laws, regulations and requirements and strive to continuously improve our social and environmental performance throughout the value chain. We take full responsibility for our actions and we expect our suppliers to do the same.

The Code of Conduct for Suppliers sets out basic requirements on human rights, labor, environment and business integrity. The code is based on the UN Global Compact. Our company expects its suppliers to uphold and comply with the principles as described in this Code of Conduct for Suppliers or at least apply an equivalent standard and conduct their business activities accordingly.

Our company can monitor compliance of suppliers towards the requirements in this Supplier Code of Conduct by requesting its suppliers to provide relevant information and to conduct audits and assessments of the supplier's operations.

Human rights and labor rights

Our company expects its suppliers to respect and protect internationally proclaimed human rights, as described in the Universal Declaration of Human Rights adopted by the United Nations, both in the workplace as well as in their general business activities. All employees and workers should be treated honestly, with dignity and respect.

Freedom of association and collective bargaining

Suppliers shall recognize and respect the rights of employees to freely associate, organize and bargain collectively, if they so wish to. In situations where the right to freedom of association and collective bargaining is restricted by applicable laws and regulations, suppliers are expected to allow alternate forms of worker representations.

Modern slavery and forced labor

Suppliers shall not participate in, or benefit from any form of forced labor, including bonded labor, involuntary prison labor, slavery, servitude or work performed under the menace of a penalty or coercion. All forms of modern slavery are unacceptable.

Child labor and young workers

Suppliers shall work against all forms of child labor. Suppliers shall not employ children below the minimum age of employment or the age for completing compulsory education in that country, whichever is higher. Suppliers shall not employ any workers under the age of 18 to perform any work that is defined in national law as hazardous.

Non-discrimination

Suppliers shall not practice any form of discrimination in hiring and employment practices. Illegitimate grounds for discrimination include but are not limited to: race, color, gender, age, language, property, nationality or national origin, religion, ethnic or social origin, caste, economic grounds, disability, pregnancy, belonging to an indigenous people, trade union affiliation, political opinion, sexual orientation.

Health and safety

Suppliers shall ensure a safe and healthy workplace or any other location where work is undertaken. All work shall be preceded by and be based on documented adequate risk management with implemented controls. This shall include physical, social and organizational health risks. Risks shall be reduced according to the following hierarchy: Elimination, substitution, engineering controls, administrative controls, and as a last hand alternative, personal protective equipment.

Wages and benefits

Suppliers should strive to pay all workers a wage that meets basic needs and provides a discretionary income. In compliance with all applicable laws, workers shall be compensated for overtime at pay rates greater than regular hourly rates. Suppliers should ensure that normal working hours and overtime working hours are within the limits permitted by applicable laws and regulations or agreed to in relevant collective agreements.

Environment

Our company expects its suppliers to manage their operations responsibly in relation to environmental risks and impacts, to adopt a precautionary approach, and to have a life cycle perspective in their business operations. Resources such as water and energy should be used efficiently and impacts on biodiversity as well as services provided by our ecosystems should be minimized.

Environmental legislation

Suppliers shall obtain and maintain all required permits and licenses and comply with the operational and reporting requirements of such permits and licenses.

Environmental protection

Suppliers shall endeavor to avoid or reduce any waste or emissions as a result of their business activities. Suppliers should use efficient technologies which aim to reduce the environmental impact as much as possible.

Environmental management systems

Suppliers whose activities have an environmental impact shall have a structured and systematic approach to take environmental aspects into account that includes establishing suitable management systems to improve environmental performance, setting targets and performing follow-ups.

Business integrity

Our company expects its suppliers to conduct business in compliance with all applicable national and international laws and regulations and adhere to internationally agreed standards of business ethics.

Compliance with laws and regulations

Suppliers shall comply with all applicable laws, rules and regulations in the countries where they operate.

Anti-corruption

Suppliers shall not engage in or tolerate any form of corruption, bribery, extortion or embezzlement. Suppliers shall not offer or accept any benefits or other means to obtain any undue or improper advantage. Such improper benefits may comprise cash, non-monetary gifts, pleasure trips or services and amenities of any other nature.

Conflict of interest

Suppliers shall avoid conflicts of interest that may compromise the supplier's credibility within our company or other exterior parties' confidence in our company.

Fair competition

Suppliers shall respect and comply with all applicable competition laws and regulations and not enter into discussions or agreements with competitors concerning pricing, market sharing or other similar activities.

Protection of intellectual property

rights and confidential information Suppliers shall respect intellectual property rights and protect confidential information by safeguarding it against misuse, theft, fraud or improper disclosure.

Commitment

Our company expects suppliers to commit to the requirements mentioned in the code by implementing management systems and control mechanisms and execute follow-ups when a possible or potential violation has come to their attention.

Management system and monitoring

Suppliers should have adequate management systems and controls in place to ensure compliance with the code or equivalent standards. The functioning and quality of the supplier's management system should be in proportion to the size,

complexity and risk environment of the supplier's business. Suppliers should secure and monitor that their own suppliers and sub-suppliers comply with the code or, where applicable, their own equivalent code of conduct.

Consequences in case of violations

Suppliers shall address any violations of the code or equivalent standards that come to their knowledge and to take appropriate actions. Depending on the severity of the violation appropriate actions could be a request for corrective measures. Persistent failure to comply with code or repeated and unjustified refusal to provide the required information may also result in suspending or terminating the suppliers activities.

This Agreement has been singularly acknowledged.

【●】

【●】

By:

By: