

This Code of Conduct (“The Code”) is applicable for Pasfrost.

PASFROST is committed to responsible ethical, social, labor and environmental practices in its partnerships with suppliers throughout the supply chain, both in terms of products and services. This “Code of Conduct” sets out Pasfrost expectations towards its stakeholders, and the basic principles to be respected in this partnership. The principles below represent minimum standards for business relationships and are based on the following international guidelines and principles :

- the Universal Declaration of Human Rights;
- the UN Global Compact and UN Sustainable Development Goals (SDG’s);
- the UN Guiding Principles on Business and Human Rights;
- the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work;
- the EU code of conduct on responsible food business and marketing practices and the derived ETI Base code (www.ethicaltrade.org)

1 Legal Requirements

Suppliers must comply with all applicable laws in the countries in which they operate, as well as the principles set out in this code of conduct. Pasfrost requires its suppliers to undertake full due diligence on all of its upstream suppliers, to ensure that they are fully compliant with all applicable laws, but in particular to ensure its supply chain is free from any human right concerns. In particular, but without limitation, suppliers must comply with the following :

Anti-bribery and corruption

Not offer or pay bribes or kickbacks of any kind, whether in dealing with individuals in the private sector or public officials. Pasfrost is committed to observing the standards of conduct set out in anti-corruption and anti-money laundering laws of the country in which Pasfrost operates.

Suppliers must comply with all applicable anti-corruption and anti-money laundering laws, as well as laws governing gifts, hospitality, payments to public officials and other related regulations.

Competition laws

Conduct business in full compliance with the anti-trust and competition laws and the jurisdiction in which the supplier operates.

Modern slavery laws

Modern slavery is a crime and a violation of fundamental human rights. It takes various forms such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person’s liberty by another to exploit for personal or commercial gain.

At Pasfrost we are committed to ensuring that there is no modern slavery in our supply chains or in any part of our business. In line with our policies we expect our supply chain to conduct business based on integrity, honesty, openness and fairness towards all stakeholders including employees, sub-suppliers and business partners.

Trade:

Comply with all applicable trade controls, as well as all applicable export and import laws and regulations.

2 Social and Labor Requirements

No Forced Labor or Human Trafficking

Workers are free to leave the workplace premises after completing the standard workday. They are free to terminate their employment after a reasonable notice. No measures shall be taken in order to force personnel to continue working with the company.

Freedom of association and the right to collective bargaining are respected

Pasfrost accepts the right of workers to organize or join trade unions (or parallel means for free association) and adopts an open attitude towards their activities without any discrimination against union representatives or workers engaged in these organizations.

Human rights

Pasfrost will only initiate and renew contractual relationships with suppliers that do not violate basic human rights, as defined in the United Nations Declaration of Human Rights ("UNDHR"), the Core Conventions of the International Labor Organisation ("ILO"), and the ILO Declaration on Fundamental Principles and Rights at Work.

No harsh or inhumane treatment is allowed

All personnel must be treated with dignity and respect. Physical, sexual or verbal abuse, the threat thereof or any other forms of intimidation shall be prohibited.

No child labour shall be used

We do not tolerate the use of underage labor and will not knowingly work with suppliers that utilize underage workers. We define underage worker as any individual younger than the local minimum working age or the age of 15, whichever is older, and/or those not abiding by the international standards as defined by the International Labor Organization (ILO) regarding age appropriate work governing family farming. Suppliers must comply with all age-related working restrictions as set by local law and adhere to international standards as defined by the International Labor Organization (ILO) regarding age-appropriate work.

Workers shall not be exposed to any hazardous, unsafe, unhealthy or unhygienic situations

Systems to detect, avoid or respond to potential threats to health and safety of all personnel shall be established. Adequate steps are taken to prevent injuries or accidents by minimizing, as far as reasonably practicable, the causes of hazards inherent to the workplace environment. This includes first aid assistance, the providing of protective equipment, regular safety trainings which shall be repeated for new and reassigned personnel, a machinery maintenance schedule, safe storage and use of chemicals, development of emergency and safety procedures, ... All personnel shall have the right to remove themselves from imminent serious danger without having to seek company permission.

Regular employment is provided

Work must be performed on the basis of a recognized employment relationship established through national law and practice. This shall not be avoided by the excessive use of other forms of employment such as labour-only contracting agreements, consecutive short-term contracts or false apprenticeship schemes.

Working Hours and Overtime

Suppliers must not allow working hours that exceed the applicable legal limit, or 60 hours per week, whichever is less. Regularly paid hours must not exceed 48 per week and overtime hours must not exceed 12 hours per week or the amount specified by local law, whichever is less. Only in exceptional cases, may working hours exceed 60 per week. Overtime work must always be voluntary and paid at a premium rate. Workers must have at least 1 full non-working day in every 7-day period

No Discrimination

In accordance with the ILO Core Conventions, suppliers to Pasfrost must not discriminate on the basis of race, gender, religion, ethnicity, nationality, age, disability, gender, marital status, sexual orientation, union membership or political beliefs, or on any other basis prohibited by the applicable Law.

Wages and Benefits

Suppliers must provide wages and benefits that meet or exceed local law requirements and are paid/provided in a timely manner. We encourage suppliers to commit to the betterment of wages and benefits to improve the lives of workers and their families in the communities where they live.

3 Confidentiality

Suppliers must keep all supply agreements and arrangements with Pasfrost and Pasfrost customer information confidential, including pricing, terms and marketing allowances and all Pasfrost brand product specifications. Such information will not be released to third parties without the prior written consent of Pasfrost, unless compelled by a court of competent jurisdiction.

4 Ethics Requirements

We are committed to acting professionally, fairly and with integrity in all our business dealings and relationships. All of our business shall be conducted in an honest and ethical manner of fair trade and free competition but with a zero tolerance approach to bribery and corruption. Financial and accounting data must be recorded correctly and be confirmed by the appropriate documents. Confidential company information must never be disclosed to others or be used for personal gain. Employees must refrain from any conflict of interest or bribery (either directly or through any third party) and they may not offer to or accept any gift from our business partners if there is any suggestion that a return favor will be expected or implied. All employees are required to avoid any activity that might lead to, or even suggest, a breach of this principle.

5 Health, Safety and Quality

Suppliers shall comply with applicable and relevant health, safety and product quality laws, regulations and standards, and in particular:

- a) Provide safe and healthy working conditions for its employees, and safe and healthy living quarters adjacent to factory premises when required by local law.
- b) Designate the responsibility for health and safety to senior management.
- c) Have a Health & Safety Policy freely available to all employees to access at any time.
- d) Demonstrate compliance with the policy and continuously strive to minimize accidents and risks, including regular awareness and training sessions for all employees.

6 Environment

Suppliers shall comply with all relevant environmental laws and regulations and recognize their responsibility to the local and global environment in which they operate by conducting business in a way that does not have negative impact on the planet or natural resources, and in particular:

- a) Manage water, energy and other natural resources responsibly
- b) Actively reduce emissions, carbon footprint and waste
- c) Maintain biodiversity, protect wildlife and endangered species

Show responsibility towards the communities in which they operate, and manage community impact resulting from company and factory operations Pasfrost shall ensure that the requirements of this code of conduct are met.

Any suspected infraction or offer made must be reported to the management without any form or repercussion for the person reporting the infraction. If you have any questions or concerns about this Code of conduct, this can be reported via email integrity@pasfrost.be or anonymously by anyone through the [link](#). Where appropriate, systems amendments and improvements shall be implemented.

All reports of suspected violations or undesired behavior will be treated in confidence and will be investigated appropriately and fairly. Concerns reported in good faith will never result in disciplinary action or dismissal. Intimidation or retaliation against anyone making such a report will not be tolerated.

Violation of this Code or applicable laws may lead to disciplinary actions or dismissal, prosecution, and/or remedies for breach of contract.

Pasfrost has clearly communicated its ethical code of conduct to its personnel at all company levels and shall make a reasonable effort to ensure that its requirements are being met by suppliers involved in the production process.

This Code has been approved by the Board of Directors of Pasfrost

Formulier Pasfrost:
Code of conduct

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