



Code of Ethics

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First implementation	October 2018	Next review date	October 2020
Contact officer	Global CSR Manager Caroline Hamaker	Obtain a copy	(S)>XLCONCEPT>CSR> Documents
Related policies/ documents	Supplier Environmental Policy; Supplier Labour Practices Policy; Supplier Fair Business Practices Policy		

1. Introduction

This Code of Ethics sets out the standards and integral, core values of XLCONCEPT. It shows to all external parties what XLCONCEPT stands for and its commitment to sustainability. This must be uploaded on our company website www.xlconcept.eu, so that it is easily accessible for all external parties. By communicating our standards and values, we expect the external parties we work with to also uphold these standards. This code can be updated in this document whenever there are changes or new values which must be added.

2. Code of Ethics

2.1 Health and safety

XLCONCEPT considers its employees' health and safety a top priority. We ensure safe working conditions, and work environment for all of our employees. We provide the necessary information to all employees in order for them to conduct day to day activities in a safe manner.

2.2 Labour practices and human rights

XLCONCEPT considers its employees as one of its biggest assets. As a result, we ensure that all of our employees are treated with respect and dignity. Moreover, XLCONCEPT does not condone any forced or child labour within its own operations or of those within its supply chain.

2.3 Discrimination and harassment

XLCONCEPT does not condone any discrimination or harassment within its business operations. We do not engage in any discriminatory practices with regard to characteristics such as race, age, sex, political opinion, religious beliefs. In addition, we are committed to never let any of our employees be subject to any physical or psychological harassment or abuse.

2.4 Diversity & Inclusion

XLCONCEPT believes that diversity & inclusion means having a collaborative, supportive, and respectful environment that increases that participation and contribution of all employees. We work to understand, accept, and value differences among our people and commit to supporting an inclusive and diverse environment.

2.5 Working conditions

XLCONCEPT prioritises its employees and therefore ensures that all of our employees receive adequate working conditions and work environment. We make sure that all employees are compensated appropriately with adequate wages, and sufficient benefits.

2.6 Energy consumption and GHG emissions

XLCONCEPT strives to reduce negative environmental impact wherever it possibly can. We are committed to integrating measures and actions that reduce energy consumption and GHG emissions within our business operations. We ensure to take appropriate measures wherever we can, and monitor the consumption and emissions to observe our progress.

2.7 Waste management

XLCONCEPT understands the importance of proper waste disposal and management. We strive to increase or improve appropriate waste disposal wherever we can. This includes responsible actions such as segregation of waste (plastic, paper, glass etc.), and monitoring of our actions in order to understand how much waste is recycled and to observe the progress of that.

2.8 Water management

XLCONCEPT is committed to conduct responsible water management wherever it can within its office environment. We strive to conserve water and ensure that it is not being used unnecessarily.

2.9 Anti-bribery and corruption

XLCONCEPT does not condone any practices of bribery or corruption. We ensure that we only implement ethical business practices within our operations. We do not stand for any fraudulent and unethical behaviour. Therefore, we do not work with companies that have such practices within their operations.

2.10 Confidentiality and data protection

XLCONCEPT takes data protection and confidentiality seriously and ensures that we make use of all data responsibly. We ensure all client, partner, supplier, and any other third-party data is stored safely and is kept confidential.

2.11 Information security

XLCONCEPT takes information security seriously and ensures that all information is protected appropriately and is not accessed by unauthorised parties. We do so by implementing structure and guidelines regarding information security.