



Code of Conduct - Cuperus Gedenken

Introduction

This Code of Conduct has been developed to create and stimulate doing business based on our core values. We believe in cooperation and we are willing to work with our business partners to achieve sustainable solutions that will contribute to social responsibility and business integrity.

This Code of Conduct applies to our employees and business partners, who we expect to act in line with the Code of Conduct. We also require our business partners, e.g. suppliers, to impose these requirements on their sub-suppliers etc. The requirements stated in this Code of Conduct are based on United Nations' Guiding Principles on Business and Human Rights, the OECD's Guidelines for Multinational Enterprises, and the ILO's fundamental labour standards.

1. General requirements

The Business Partner shall acknowledge, accept and sign the requirements as stated in this Code of Conduct. We expect the Business Partner to do the utmost to achieve our standards. We also put great emphasis on transparency and we expect communication to be open, truthful, complete, timely and not in any way misleading. If the Business Partner does not comply or show unwillingness to take corrective actions as agreed upon, it will ultimately end the business relationship.

Any material breaches of this Code of Conduct must immediately be reported to Cuperus Gedenken, see point 4 below.

Cuperus Gedenken or by Cuperus Gedenken chosen third party reserve the right to make announced- or unannounced inspection visits at Business Partner for audit purposes and expect to get access to premises and personnel.

2. Legal requirements

We expect our Business Partner, in all their activities, to follow the national laws in the countries in which they operate. Should any requirement in this Code conflict with the national law in any country or territory, the law must always be followed. The requirements in this code of conduct may go beyond the requirements set out in national law.

3. Ethical, environmental and social requirements

3.1 Workers' rights

Every employee shall be treated with respect and dignity. No use of humiliating or physical punishment is accepted, and no employee shall be subject to physical, sexual, psychological or verbal harassment or abuse.

No employee shall be discriminated against in employment or occupation on the grounds of sex, race, colour, age, pregnancy, sexual orientation, religion, political opinion, nationality, ethnic origin, disease or disability.

All employees are entitled to a written employment contract, in the local language, which includes the terms of employment.

3.2 Child labour

We do not accept child labour in any shape or form.

The Business Partner shall comply with the national minimum age for employment, or the age of completion of compulsory education and shall not employ any person under the age of 15. For mining processes, the Business Partner shall not employ any person under the age of 18.

3.3 Forced labour

We do not accept forced labour, including:

- Debt bondage: bonded labour resulting from previous debt, which may have been incurred before the worker's birth, or a contractual obligation;
- Forced labour for production purposes in prisons, labour camps or prisoner-of-war camps;
- Work under coercion and in inhuman conditions for irregular or non-existent pay;
- Coercive labour, in which people are coerced to work overtime indirectly because they cannot make ends meet on their customary pay.

3.4 Living wage

We expect our Business Partner to ensure that a living wage is being paid within a reasonable period of time. A living wage as 'a wage that is sufficient to provide for the basic needs of a family of average size in a particular economy'. This means that a worker can in any event afford meals, rent, healthcare, education, clothes and transport and, at the same time, is able to save.

3.5 Right to organise

All employees have the right to form or join associations of their own choosing, and to bargain collectively.

3.6 Health & safety

We expect our Business Partner to follow all relevant legislations, regulations and directives in the country in which they operate to ensure a safe and healthy workplace. The workplace shall be ordered such as the well-being and health of the employees are neither jeopardized nor compromised.

3.7 Land rights and the living environment

We do not accept violations of land rights, such as land expropriation, forced relocations and the destruction of burial sites and other places of heritage value. Land and land use rights are a human rights issue because of their direct relationship with the right to food, water and a clean-living environment.

We expect our Business Partner to guarantee that any materials used and products produced do comply with legislation and regulations regarding the protection of the environment. Especially air, soil and water pollution pose a health risk to communities in the vicinity of natural stone quarries. The Business Partner must have the relevant environmental permits and licenses for its operations. On request, the Business Partner shall provide applicable data for product information, safety datasheets etc. Cuperus Gedenken and Business Partner shall actively minimize the logistic impact on the environment, within reasonable means.



4. Reporting non-compliance

This Code of Conduct and operating procedures are intended to prevent and detect improper- or illegal activities. Any breach against this Code of Conduct, shall be reported to Cuperus Gedenken open or anonymous:

Mr. M. van der Veen (Director)

directie@cuperusgedenken.nl

Phone: +31 (0)481 37 1333

For employees and our business partner, the whistle-blower policy creates a safe environment to report on any form of non-compliance. Confidentiality will be maintained to the extent permitted by law. All reports are subject to appropriate investigation in order to determine appropriate measures. Both Failing to report (suspected) violation as well as non-cooperation in investigation of the aforementioned, will be considered a breach of this Code of Conduct.

Cuperus Gedenken a member of the TruStone Initiative. The TruStone Initiative has its own complaint and dispute mechanism. Workers or parties adversely affected by Cuperus Gedenken or its Business Partners may also lodge a complaint with the committee. The Complaints and Disputes Committee will issue a binding ruling.

Complaints can be submitted to the committee via: AGT-complaints@internationalrbc.org

Meppel, [date]

Cuperus Gedenken

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Business Partner

Date:

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