

## VONQ Supplier Code of Conduct

**Version:** 1.0

**Last Updated:** 25 July 2025

### 1. Purpose

- This Supplier Code of Conduct ("Code") sets forth the minimum standards and expectations that VONQ Group B.V., its subsidiaries, and affiliates (collectively, "VONQ") require from all suppliers, vendors, subcontractors, agents, and other third parties ("Suppliers") who provide goods and services to VONQ. "Suppliers" also includes media partners and other contracted external parties.
- VONQ is committed to conducting business ethically, responsibly, and in compliance with applicable laws and regulations. We expect our Suppliers to share this commitment and to conduct their operations accordingly.
- This Code forms part of the contractual relationship between VONQ and its Suppliers. Compliance is mandatory, and failure to comply may result in the suspension or termination of the business relationship.

### 2. Compliance with Laws and Regulations

Suppliers must comply with all applicable laws, rules, and regulations in the countries where they operate, including but not limited to:

- International trade controls, sanctions, and export laws.
- Anti-corruption and anti-bribery laws.
- Competition and antitrust regulations.
- Data protection and privacy laws (including the EU GDPR).

### 3. Ethical Business Practices

- **Zero Tolerance for Bribery and Corruption:** Suppliers must not, directly or indirectly, offer, pay, solicit, or accept bribes or any form of improper payment.
- **Conflicts of Interest:** Suppliers must avoid situations that create an actual or perceived conflict of interest with their obligations to VONQ.
- **Fair Competition:** Suppliers must conduct business lawfully and in line with fair competition principles and not engage in collusion, bid-rigging, or price-fixing.
- **Gifts and Hospitality:** Suppliers must ensure any gifts or hospitality offered to VONQ employees are appropriate, infrequent, modest in value, and never intended to improperly influence business decisions.

## 4. Fair Labor Practices and Human Rights

VONQ expects Suppliers to uphold internationally recognized human rights and comply with fair labor standards in line with the UN Guiding Principles on Business and Human Rights and applicable labor laws.

Suppliers must ensure:

- **No Forced Labor or Human Trafficking:** All work must be voluntary. Suppliers must not engage in forced, bonded, or indentured labor, or human trafficking.
- **No Child Labor:** Suppliers must not employ workers under the minimum legal working age in their country. Where local laws allow limited employment of young workers, such employment must not interfere with the child's education or development.
- **Fair Wages and Working Hours:** Suppliers must pay at least the minimum legal wage, provide any legally mandated benefits, and ensure working hours comply with applicable laws and do not endanger worker health or safety.
- **Non-Discrimination and Equal Opportunity:** Suppliers must not discriminate based on race, color, gender, age, religion, sexual orientation, disability, or any other protected characteristic.
- **Freedom of Association:** Suppliers must respect workers' rights to form or join labor unions, bargain collectively, and engage in peaceful assembly in accordance with local laws.

## 5. Health, Safety, and Environment

- **Safe Working Conditions:** Suppliers must provide a safe and healthy work environment in compliance with applicable laws and industry standards.
- **Environmental Responsibility:** Suppliers must comply with all applicable environmental laws and regulations, and take reasonable steps to minimize their environmental impact (e.g., reducing waste, conserving energy, and responsible sourcing). VONQ encourages suppliers to adopt sustainable practices where feasible, appropriate to the nature and scale of their operations.

## 6. Data Protection and Confidentiality

- **Data Security:** Suppliers must implement appropriate technical and organizational measures to protect personal data and VONQ confidential information.
- **Use of Information:** Confidential information must be used only for the purpose intended and must not be disclosed to unauthorized parties.
- **Incident Notification:** Suppliers must promptly inform VONQ of any data breaches or security incidents involving VONQ data.
- **Regulatory Compliance:** Suppliers must comply with all applicable data protection regulations in all jurisdictions in which they operate.

## 7. Responsible Sourcing

Where applicable, Suppliers must:

- Ensure that materials are sourced responsibly and do not contribute to conflict, human rights abuses, or environmental harm (e.g., conflict minerals).
- Be transparent about their own supply chains upon VONQ's reasonable request and take steps to ensure their own suppliers comply with similar ethical standards.

## 8. Reporting Concerns

Suppliers must report any actual or suspected violation of this Code or any applicable law related to their business with VONQ. Reports can be made confidentially to:

**[legal@vonq.com](mailto:legal@vonq.com)**

VONQ strictly prohibits retaliation against any party who, in good faith, reports concerns or participates in an investigation.

## 9. Acknowledgment

By accepting a purchase order or entering into a contract with VONQ, the Supplier acknowledges and agrees to comply with this Supplier Code of Conduct.

Suppliers are also responsible for ensuring that their employees, agents, and subcontractors are aware of and comply with this Code.

## 10. Updates and Enforcement

- This Code may be updated from time to time. The most current version will be published on [vonq.com](http://vonq.com). Suppliers are responsible for reviewing and adhering to the latest version.
- To help ensure compliance, VONQ may reasonably request information or documentation from Suppliers demonstrating adherence to this Code.
- In limited cases where serious concerns arise, VONQ reserves the right to take appropriate steps to verify compliance, always with reasonable notice and in good faith.
- Failure to comply with this Code may result in appropriate corrective action, including potential suspension termination of the business relationship.