



CODE OF CONDUCT & ETHICS POLICY

Group ConHexa – Effective Date: 01/01/2025

Document available at : <https://www.conhexa.com/>

1. Preamble

At Group ConHexa, we place integrity, respect, transparency, and accountability at the core of our operations. This Code of Conduct sets out the principles, rules, and behaviors expected of all employees, partners, suppliers, and subcontractors. It serves as a guide to ensure ethical and compliant conduct, regardless of location or business activity.

This Code aims to:

- Strictly comply with applicable local and international laws and regulations.
- Protect human rights in accordance with the fundamental conventions of the International Labour Organization (ILO).
- Prevent all forms of corruption, fraud, conflicts of interest, and exploitation.
- Promote a safe, inclusive, respectful, and fair working environment.
- Ensure confidentiality and data protection.

2. Scope

This Code applies to:

- All employees, executives, temporary staff, interns, and collaborators of Group ConHexa.
- All business partners, suppliers, subcontractors, and third parties acting on our behalf.
- All activities, including the supply chain.

3. Core Principles

- Integrity and Honesty: Act with loyalty, transparency, and accountability in all professional interactions.
- Compliance with Laws: Respect all applicable laws, standards, and regulations.
- Equality and Non-Discrimination: Ensure equal opportunities and prohibit any form of discrimination, harassment, or intimidation.
- Confidentiality: Protect internal information, client and partner data, and personal data.
- Health, Safety, and Environment: Ensure a safe, healthy, and environmentally responsible work environment.
- Anti-Corruption Commitment: Zero tolerance for corruption, bribery, kickbacks, and fraudulent practices.

4. Respect for Human Rights and International Standards

We strictly adhere to:

- The Universal Declaration of Human Rights.
- Fundamental ILO conventions, including:
 - o Child labor: Strict prohibition of child labor (minimum legal age: 16, 15 for apprentices). Systematic age verification at hiring.
 - o Wages and benefits: Compliance with minimum wage or collective agreement thresholds; payment of mandatory social contributions.
 - o Working hours: Strict compliance with legal limits (35 hours/week, maximum 48 hours/week). Accurate monitoring via HRIS tools.
 - o Modern slavery and forced labor: Absolute prohibition.
 - o Harassment and intimidation: Zero tolerance.

We require our suppliers and subcontractors to respect these same standards, reinforced through contractual clauses and regular audits.

5. HR Policy and Human Capital Development

Our HR policy is guided by:

- Creating a safe, respectful, healthy, and inclusive work environment.
- Ensuring equal opportunities at all stages: recruitment, training, career progression.
- Promoting diversity and gender balance.
- Supporting professional development and continuous learning.
- Enhancing employee well-being through health and safety initiatives.

Measurable objectives:

- Maintain a high employee training rate.
- Achieve gender balance in management positions.
- Reduce workplace accidents, aiming for zero incidents.

6. Anti-Corruption and Ethical Practices

- Zero tolerance for corruption, bribery, undue benefits, or kickbacks.
- Gifts or invitations must be reasonable, customary, transparent, and must never influence business or contractual decisions.
- Regular supply chain checks to prevent and detect risks of corruption or forced labor.

7. Conflict of Interest Management

Employees and partners must avoid any situation where personal interests conflict with those of Group ConHexa. Any potential conflict must be promptly disclosed to management or compliance officers.

8. Control, Monitoring, and Evidence Procedures

- Recruitment: Use of objective methods (e.g., Simulation-Based Recruitment), absolute prohibition of child labor, systematic ID verification, criminal record checks for sensitive positions (OEA requirements).
- Payroll: Full compliance with legislation, regular pay slip audits, organization of Annual Mandatory Negotiations (NAO) on salaries, working hours, professional equality, and quality of work life.
- Working hours: Accurate tracking via Kélio Bodet HRIS, management of overtime, automatic alerts, and secure data archiving.
- Harassment: Clear policy in internal regulations, confidential reporting channels, and rigorous case follow-up.
- Audits: Regular internal audits integrated into certifications (BRC Storage), external audits by specialized providers, active cooperation with relevant authorities (occupational health, labor inspection, social security).

9. Whistleblower Protection

- Provision of a secure, confidential, and accessible channel to report violations.
- Guaranteed protection against retaliation.
- Impartial, confidential, and timely handling of reports.

10. Information Security and Data Protection

- Strict protection of personal and sensitive data of employees, clients, partners, and third parties.
- Adherence to confidentiality, integrity, availability, and resilience of IT systems.
- Immediate reporting to management in case of data breach or leak.
- Full cooperation with authorities during investigations or incidents.

11. Sanctions

Any violation of this Code may result in:

- Disciplinary actions, up to and including dismissal.
- Termination of contracts with non-compliant partners.
- Legal action, depending on the severity of the offense.

12. Commitment

All employees, suppliers, and partners must commit to respecting this Code and promoting it within their teams and subcontractors.

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