

# Newtec

## SUPPLIER CODE OF CONDUCT

Document UID: 6

Version 1.0

Issue Date: September, 2017

Author: Inge Palmans

Confidentiality: Unrestricted

---

Approved by the Newtec Management Board & Board of Directors

---

Implementation of this Code is mandatory in Newtec Cy & its sites  
in Sint-Niklaas, Louvain-La-Neuve, Erpe-Mere, Berlin, Brest, US, Dubai,  
Singapore, China & Brazil.

[www.newtec.eu](http://www.newtec.eu)

Follow Newtec Satcom on

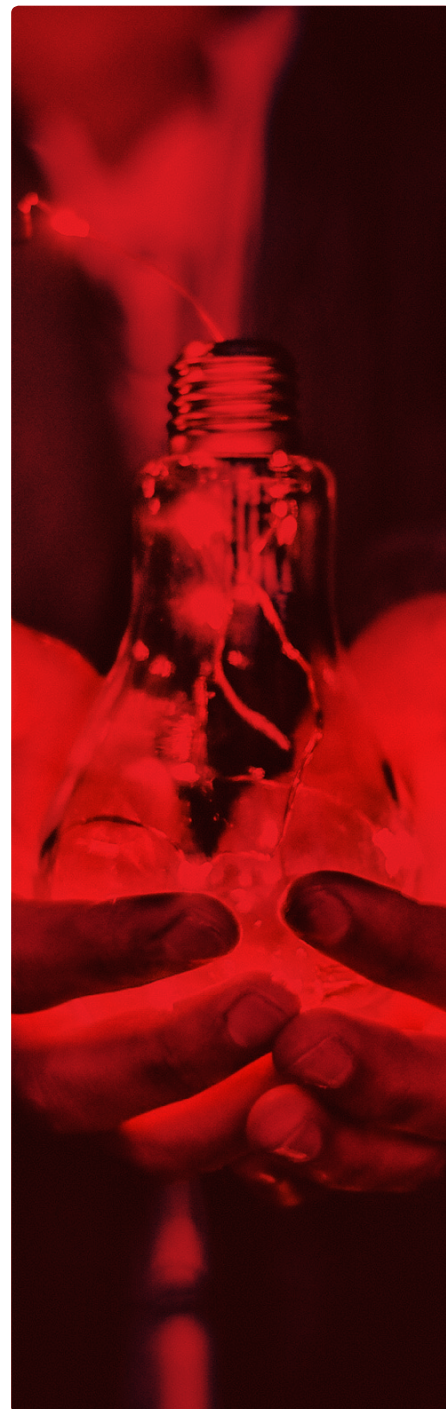


SHAPING THE FUTURE OF SATELLITE COMMUNICATIONS

**Newtec**

# TABLE OF CONTENTS

FOREWORD	3
<b>1. LAWS &amp; REGULATIONS</b>	<b>4</b>
<b>2. HUMAN RIGHTS</b>	<b>4</b>
2.1 Child Labor	4
2.2 Human Trafficking	4
<b>3. WORKING CONDITIONS</b>	<b>5</b>
3.1 Fair Pay & Benefits	5
3.2 Non-Discrimination	5
3.3 Harassment	5
3.4 Collective Bargaining	5
3.5 Substance Abuse	5
3.6 Security	5
<b>4. ANTI-CORRUPTION</b>	<b>6</b>
4.1 Anti-Corruption Laws	6
4.2 Improper Payments	6
4.3 Gifts & Business Courtesies	6
<b>5. CONFLICTS OF INTEREST, ANTI-TRUST &amp; COMPETITIVE BEHAVIOR</b>	<b>7</b>
5.1 Anti-Trust	7
5.2 Insider Trading	7
5.3 Counterfeit Parts	7
5.4 Accurate Books & Records	7
<b>6. INFORMATION PROTECTION</b>	<b>8</b>
6.1 Confidential/Proprietary information	8
6.2 Intellectual Property	8
<b>7. GLOBAL TRADE COMPLIANCE</b>	<b>8</b>
<b>8. QUALITY</b>	<b>9</b>
<b>9. ENVIRONMENT, HEALTH &amp; SAFETY</b>	<b>9</b>
9.1 Conflict Minerals	9
<b>10. ETHICS PROGRAM</b>	<b>10</b>
10.1 Ethics Policies	10
10.2 Non-Retaliation	10
<b>11. ASKING QUESTIONS &amp; REPORTING CONCERNS</b>	<b>10</b>



# FOREWORD

Newtec's Supplier Code of Conduct formalizes the key principles under which suppliers to Newtec cy are required to operate.

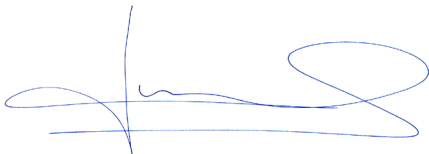
This Supplier Code makes clear that, while we recognize differences in cultures and legal requirements, we expect our suppliers (anyone producing products or performing services for us) to be aligned with our values and high standards for product and service delivery. It encompasses principles from the United Nations regarding Sustainable Development Goals.

Suppliers are required to comply with this Supplier Code and to have and maintain practices similar to those in Newtec's Code of Business Conduct & Ethics, which can be found at: [www.newtec.eu/about-newtec/nims](http://www.newtec.eu/about-newtec/nims). This Code denotes our commitments and expectations towards interested parties in accordance with the UN Sustainable Development Goals. It provides guidance for employees and everyone who works on our behalf.

The Supplier Code of Conduct is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, suppliers must first adhere to applicable laws and regulations, then the contract terms, followed by this Supplier Code of Conduct.



Thomas Van den Driessche  
Chief Executive Officer

A blue ink handwritten signature, appearing to be 'T. Van den Driessche', written in a cursive style.



# 1. LAWS & REGULATIONS

We expect our suppliers to maintain full compliance with all laws and regulations applicable to their business. When conducting international business, suppliers must comply with local and international laws and regulations.

---

# 2. HUMAN RIGHTS

We expect our suppliers to treat people with respect and dignity, encourage diversity in their workforce, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.

## 2.1 CHILD LABOR

Newtec suppliers may not use child labor in the performance of work for Newtec. The term “child” refers to any person under the age of 15 or under the age for completing compulsory education, whichever is greater. Any hazardous work performed for Newtec must be done by individuals over the age of 18.

## 2.2 HUMAN TRAFFICKING

We expect our suppliers to adhere to regulations prohibiting human trafficking and comply with all applicable local laws in the country or countries in which they operate. Suppliers must refrain from violating the rights of others and address any adverse human rights impact of their operations. Suppliers must educate employees on prohibited trafficking activities and provide avenues for raising issues or concerns about human trafficking without fear of retaliation.

---

# 3.

## WORKING CONDITIONS

We expect our suppliers to practice mutual trust and respect in the workplace and provide a workplace free of rude, disrespectful, discriminatory, or harassing behavior. We expect our suppliers to ensure that all employment actions – including hiring, payment, benefits, training opportunities, advancement, discipline, termination, and retirement – are based on skills and job performance, and not on employees' personal characteristics or beliefs.

### 3.1 FAIR PAY & BENEFITS

We expect our suppliers to meet local minimum wage and overtime pay requirements. Working hours must not exceed legal limits.

### 3.2 NON-DISCRIMINATION

We expect our suppliers to provide equal employment opportunity to employees and applicants for employment, without regard to race, ethnicity, religion, color, sex, national origin, age, military veteran status, ancestry, sexual orientation, gender identity or expression, marital status, family structure, genetic information, or mental or physical disability, so long as employees are able to competently perform the essential functions of their job, with or without reasonable accommodation.

### 3.3 HARASSMENT

We expect our suppliers to ensure that their employees are afforded an employment environment that is free from physical, psychological, and verbal harassment or other abusive conduct.

### 3.4 COLLECTIVE BARGAINING

Suppliers must permit employees to independently choose whether to join a trade union or to participate in union activities, without supplier interference. Suppliers are expected to respect employee's choices, and to comply with applicable processes and laws on collective representation, bargaining, and consultation.

### 3.5 SUBSTANCE ABUSE

We expect our suppliers to maintain a workplace free from illegal use, possession, sale, or distribution of controlled substances.

### 3.6 SECURITY

Newtec suppliers must protect worker health by providing a safe workplace and appropriate security measures.

# 4.

## ANTI-CORRUPTION

We expect our suppliers to conduct appropriate levels of due diligence to prevent and detect corruption in all business arrangements, including their own supply-chain relationships, partnerships, joint ventures, offset agreements, and the hiring of consultants.

### 4.1 ANTI-CORRUPTION LAWS

Our suppliers must comply with the anti-corruption laws, directives and/or regulations that govern operations in the countries in which they do business.

### 4.2 IMPROPER PAYMENTS

The receipt, payment, and/or promise of monies or anything of value, directly or indirectly, intended to exert undue influence or to gain improper advantage is prohibited under this Supplier Code. Our suppliers must not offer any payments to, or receive any payments from, any government official, political party, candidate for public office, customer, supplier, agent, representative or others. This prohibition against improper payments applies even in locations where such payments are commonplace and do not violate local law.

### 4.3 GIFTS & BUSINESS COURTESIES

We expect our suppliers to compete on the merits of their products and services. The exchange of business courtesies may not be used to gain an unfair competitive advantage. In any business relationship, our suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulations, and that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

---

# 5.

## CONFLICTS OF INTEREST, ANTI-TRUST & COMPETITIVE BEHAVIOR

We expect our suppliers to avoid all conflicts of interest or situations giving the appearance of a potential conflict of interest in their dealings with Newtec. We expect our suppliers to provide notification to all affected parties in the event that an actual or potential conflict of interest arises. This includes a conflict between the interests of our company and a supplier's personal interest or those of close relatives, friends or other associates. In addition, we expect our suppliers to deal fairly with their customers, suppliers, competitors and employees and to avoid taking unfair advantage of such parties through manipulation, concealment or misuse of information or misrepresenting material facts.

### 5.1 ANTI-TRUST

Our suppliers must not fix prices or coordinate market conduct with competitors or their own suppliers in a way that improperly restricts competition. They must not exchange current, recent, or future pricing information with competitors. Our suppliers must refrain from participating in a cartel or any kind of association or arrangement that affects competition in a manner not allowed by the applicable laws and regulations.

### 5.2 INSIDER TRADING

Our suppliers and their personnel must not use material, non-public information obtained in the course of their work with Newtec as the basis for stock trading or to enable others to trade on inside information.

### 5.3 COUNTERFEIT PARTS

We expect our suppliers to develop, implement, and maintain methods and processes appropriate to their products to minimize the risk of introducing counterfeit parts and materials into deliverable products. Effective processes should be in place to detect counterfeit parts and materials, to exclude them from the delivered product, and to provide notification to recipients of counterfeit products when warranted.

### 5.4 ACCURATE BOOKS & RECORDS

We expect suppliers to create and maintain complete and accurate business transaction records, in accordance with applicable laws and contract terms, and to prevent alteration, concealment, or misrepresentation of those records. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Upon request, all records of Newtec transactions must be made available to Newtec for review and audit.

## 6.

# INFORMATION PROTECTION

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorized access, use, modification, disclosure, or destruction through appropriate physical and electronic security procedures. Suppliers must comply with all applicable data privacy laws. Suppliers shall ensure extension of this requirement to their own supply chain.

### 6.1 CONFIDENTIAL/PROPRIETARY INFORMATION

We expect our suppliers to properly handle sensitive information, including confidential, proprietary, and personal information. Information should not be used for any purpose other than the business purpose for which it was provided.

### 6.2 INTELLECTUAL PROPERTY

We expect our suppliers to respect and comply with all the laws governing intellectual property rights, including intellectual property designated as a trade secret, as confidential, or that is subject to patents, copyrights, or trademarks restrictions.

---

## 7.

# GLOBAL TRADE COMPLIANCE

We expect our suppliers to comply with all applicable laws, directives, and regulations governing the import, export, re-export and transfer of goods, technical data, software and services. Suppliers shall provide truthful and accurate information and obtain export licenses and/or consents where necessary.

---



## 8.

# QUALITY

Suppliers must take due care to ensure their work product meets Newtec's quality standards. We expect our suppliers to have in place quality assurance processes to identify defects and implement corrective actions, and to facilitate the delivery of a product whose quality meets or exceeds specifications and/or contractual requirements. Where applicable, suppliers are expected to flow down requirements to their supply chain.

---

## 9.

# ENVIRONMENT, HEALTH & SAFETY

We expect our suppliers to operate in a manner that actively manages risk, conserves natural resources, and protects the environment. We expect our suppliers to apply environmental management system principles in order to establish a systematic approach to the management of risks/hazards and opportunities associated with the environment, including potential loss from regulatory non-compliance, reputational loss, and opportunities for business growth through operational and product stewardship.

We expect our suppliers to comply with all applicable environmental, health and safety laws, regulations, and directives. Suppliers should protect the health, safety, and welfare of their employees, visitors, and others who may be affected by their activities.

### 9.1 CONFLICT MINERALS

We expect our suppliers to adhere to all applicable conflict minerals regulations. If a product contains one or more of the so-called conflict minerals (tin, tantalum, tungsten and gold or their ores) we expect our suppliers to provide, on request, transparency on the supply chain up to the smelter.

---

# 10.

## ETHICS PROGRAM

Commensurate with the size and nature of their business, we expect our suppliers to have management systems in place to support compliance with laws, regulations, and the expectations of this Supplier Code of Conduct.

### 10.1 ETHICS POLICIES

We encourage our suppliers to have documented ethics and compliance policies, to implement their own code of conduct, and to flow down the principles of their code to their supply chain.

### 10.2 NON-RETALIATION

We expect our suppliers to provide their employees and contractors with avenues for raising legal or ethical issues or concerns without fear of retaliation. We expect our suppliers to take action to prevent, detect, and correct any retaliatory actions.

---

# 11.

## ASKING QUESTIONS & REPORTING CONCERNS

Suppliers should report in good faith any potential ethical issue or violation by Newtec or supplier employees. Newtec investigates each allegation thoroughly to determine the facts and the parties involved.

Newtec has multiple contact points to report concerns or address requests:

- Ethical issues or violations:
    - Local Newtec representatives
    - Newtec Quality
    - Newtec Security
  - Request for a waiver:
    - Newtec Supply Chain
-