



LuxFLAG

Vendor Code of Conduct

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Luxembourg Finance Labelling Agency, 2024.

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For further information on LuxFLAG's activities, please consult our website, www.luxflag.org.

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FOREWORD

Isabelle Delas

Chief Executive Officer

We believe that our dedication and shared commitment to common values should be reflected in the parties with whom we enter into business relations. Therefore, this Vendor Code of Conduct is a result of LuxFLAG's desire to advocate for standards integrating ESG factors into our relationship with vendors.

Being proactive and holding our vendors responsible for applying our own ethical, labour, human rights and environment protection standards is the only way we can shape a more resilient and responsible world.

This Vendor Code of Conduct plays a crucial role in achieving LuxFLAG's mission of promoting sustainable finance. By setting out clear expectations for behaviour, it ensures that our vendors uphold the highest standards of integrity, professionalism and ethical conduct. By adhering to this Code, vendors demonstrate their commitment to the values that underpin our organisation and are thus eligible to engage with us.

We are grateful for the ongoing dedication that our vendors show and for their support in helping us achieve our goals.

1. GENERAL PROVISIONS

1.1 Our Mission

LuxFLAG is a non-profit, independent association aiming to promote the raising of capital for the Responsible Investment sector by awarding a recognisable label to eligible investment vehicles and insurance products. The objective is to reassure investors that the labelled investment vehicles invest in the respective sectors and activities in a responsible manner.

Moreover, LuxFLAG's vision consists in helping financial sector participants move forward in the sustainable finance journey, by sharing best practices.

1.2 Purpose of the Vendor Code of Conduct

This Vendor Code of Conduct (hereinafter the "Code") sets out a minimum framework for business ethics and professional behaviour that all vendors, suppliers, contractors, sub-contractors, partners, and their representatives with whom LuxFLAG engages to provide the organisation services or goods (hereinafter "Vendors") are expected to adhere to as part of their individual and collective commitment to fostering a positive change.

Since LuxFLAG is committed to the **highest standards of ethical conduct, integrity, and social and environmental responsibility**, we expect our vendors to aspire to the same standards throughout their business operations. Therefore, we expect them to have their own documented policies and procedures in place addressing the matters detailed herein (or to rely on standardised ones) and to acknowledge to have read, understood and adhere to this Code by signing the form available in section 5.3. Additionally, we expect our vendors to contract with third parties having the same standards.

1.3 Scope

The Code applies to all vendors entering into a business relationship with LuxFLAG. It encompasses all activities related to the procurement, production, delivery and ongoing support of products and services, regardless of location.

LuxFLAG vendors' employees, agents, subsidiaries, contractors and sub-contractors, as well as their supply chains (hereinafter "Representatives") must adhere to this Code while conducting business with or on behalf of LuxFLAG.

2. BUSINESS PRACTICES AND ETHICAL CONDUCT

LuxFLAG requires its vendors to operate in compliance with applicable international, European, and national laws and regulations and in strict accordance with the principles of loyalty, fairness and integrity while conducting business with or on behalf of LuxFLAG; hence, ensuring that all applicable practices are legal and ethically sound.

In particular, vendors shall adhere to strict standards of confidentiality, avoidance of conflicts of interest and corruption, fair competition, and prevention of money laundering and terrorist financing.

Adherence to the aforementioned standards fosters trust and ensures that every task performed contributes to maintaining the integrity and commitment upon which LuxFLAG stands.

2.1 Respect for Privacy and Confidentiality

Vendors shall respect the privacy and confidentiality of all information pertaining to LuxFLAG. This includes safeguarding personal data, proprietary information and any other confidential data obtained during their business relationship with LuxFLAG.

Vendors must take appropriate measures to prevent any unauthorised access, disclosure or misuse of such information and comply with all applicable data protection and privacy laws.

2.2 Avoidance of Conflicts of Interest

Vendors must avoid any situations that could result in a conflict of interest in their engagement with LuxFLAG. This includes any activities, investments or relationships that might interfere with a vendor's ability to act in the best interest of LuxFLAG in their context of the contractual relationship with LuxFLAG. To this purpose, vendors are expected to promptly identify and fully disclose any potential or actual conflicts of interest to the LuxFLAG management.

2.3 Anti-corruption

LuxFLAG maintains a zero-tolerance policy towards corruption and bribery. Vendors shall not engage in any form of corruption, extortion, embezzlement or bribery. This includes offering, giving, receiving, or soliciting any improper advantages or incentives in order to obtain or retain business or any other benefit. All business dealings must be transparent and accurately reflected in vendors' records.

2.4 Fair Competition

Vendors must conduct their business in a manner that promotes fair competition and prohibits any form of anti-competitive practices. This includes avoiding any agreements or practices that unlawfully restrict competition, such as price-fixing, market allocation, or abuse of dominant market positions.

2.5 Prevention of Money Laundering and Terrorist Financing

Vendors are required to adhere to all applicable laws and regulations pertaining to the prevention of money laundering and terrorist financing. They must not engage in or facilitate any activities related to money laundering or terrorist financing. To this purpose, vendors are expected to implement effective controls and procedures within the legal requirements, aimed at detecting and preventing money laundering activities, as well as to report any suspicious activities to the relevant authorities in a timely manner.

3. HUMAN RIGHTS

LuxFLAG commits to the United Nations (hereinafter the “UN”) Guiding Principles on Business and Human Rights and recognises its responsibility to protect, preserve and promote human rights globally. Indicative of its commitment, LuxFLAG has become a signatory to the Pacte national ‘Entreprises et droits de l’Homme’ in July 2022. In this respect, LuxFLAG’s vendors shall fully comply with relevant human rights laws, regulations and standards throughout their operations. This includes, without limitation, adherence to the Universal Declaration of Human Rights of the UN, the conventions of the International Labour Organization, and the guidelines of the Organization for Economic Cooperation and Development for Multinational Enterprises on Responsible Business Conduct.

3.1 Labour Standards

Our vendors shall actively work to eliminate all forms of illegal and forced labour, child labour and discrimination in employment. This includes discrimination based on gender, race, religion, age, disability, sexual orientation, political opinion, nationality, and social or ethnic origin.

3.2 Work Practices

Our vendors are required to uphold and enforce the following values and principles: respect for human rights in working conditions, adherence to legal provisions regarding maximum working hours and overtime pay, compliance with applicable minimum wage laws, and respect for freedom of association and the right to collective bargaining.

3.3 Health and Safety

Vendors are expected to integrate comprehensive health and safety management practices into all aspects of their operations. They must ensure a safe and healthy work environment, fully adhering to all applicable health and safety laws, regulations and standards. This includes compliance with regulations related to occupational safety, emergency preparedness, occupational injury and illness, industrial hygiene, physically demanding work, machine safeguarding, sanitation, food, and housing. They should proactively address and mitigate hazards inherent in the workplace, engaging in best effort to prevent accidents and injury at work and workers with appropriate information and training, when necessary.

4. ENVIRONMENTAL CONSERVATION

Sustainability is key to LuxFLAG's mandate and daily operations as we strive to protect the health of the planet and people living on it. LuxFLAG's vendors are therefore expected to comply with all applicable environmental laws, regulations and standards and are encouraged to implement policies that reduce any negative environmental impact.

In particular, vendors should address the environmental impacts of their operations, including raw material usage, energy consumption, greenhouse gas (GHG) emissions, water usage, waste disposal, air quality, and biodiversity, as appropriate to the size and nature of their business.

5. FINAL PROVISIONS

5.1 Administration

The LuxFLAG Human Resources department in conjunction with the Legal and Compliance department are responsible for the implementation and interpretation of the Code and should be consulted in advance in the event of the adoption or amendment of any internal LuxFLAG provision relating to the Code.

Any amendment and supplement to the Code can be proposed by the Human Resources department, as well as the Legal and Compliance department after consultation with the relevant departments, when necessary.

5.2 Violations and Termination

Vendors are required to promptly notify LuxFLAG through the contact details provided in the contractual agreement they have entered into with us whenever they encounter a situation that causes them to violate this Code. Vendors must actively self-monitor and demonstrate compliance with the Code and are encouraged to raise any question or concerns related to this Code.

LuxFLAG reserves the right to immediately remove any vendor, representative, or staff member who acts unlawfully or in a manner inconsistent with this Code or any applicable LuxFLAG policies. We will report to the concerned authorities any violation of the law detected by us.

Please be aware that adherence to this Code is mandatory and supplements any other obligations stipulated in any agreements between the vendor and LuxFLAG.

5.3 Vendor Acknowledgement

I certify that our company has received, read and understood and will abide by the LuxFLAG's Vendor Code of Conduct.

Company Name

Representative

Job Title

Signature

Date