

# Supplier Code Of Conduct

At LeasePlan we conduct our business according to ethical standards. This is vital to winning and retaining the trust and confidence placed in us by our stakeholders, which is crucial to the success of LeasePlan. We also expect our stakeholders to conduct business ethically. For example, the LeasePlan Code of Conduct provides LeasePlan employees worldwide with a framework for making responsible everyday business decisions. LeasePlan has also created a separate Supplier Code of Conduct, which establishes the minimum standards we expect our suppliers to abide by.

The Supplier Code of Conduct reflects the values and behaviours that apply within our organisation to ensure ethical behaviour in the broadest sense, including corporate responsibility in doing business and customer focus. We realise that it does not address every situation our suppliers may face. It does, however, illustrate the important principles of ethical business conduct that we expect our suppliers to keep in mind when working with, for, or on behalf of LeasePlan.

## 1. Our standards

The following section explains the 10 key principles that form LeasePlan's Supplier Code of Conduct. These are the minimum ethical business standards that LeasePlan expects its suppliers to uphold.

### 1.1 Honesty and trust

The supplier, its employees, its contractors and its supply chain ("The Supplier") shall act with integrity, honesty, openness and fairness in its business dealings and shall avoid any conduct that might harm or contribute to harming LeasePlan's integrity and/or reputation.

### 1.2 Respect for the law

The Supplier shall respect and adhere to all applicable local and international laws, rules and regulations.

### 1.3 Human rights

The Supplier shall respect the human rights as stated in the United Nations' Universal Declaration of Human Rights, The UN Guiding Principles on Business and Human Rights, the Ten Principles of the UN Global Compact and the Principles of the International Labour Organisation, and shall avoid being complicit in human rights abuses of any kind.

### 1.4 Responsibilities to employees

- The Supplier shall not use forced or compulsory labour and shall not employ child labour.
- The Supplier shall maintain a safe, healthy and non-discriminatory work environment.
- The Supplier shall provide equal employment opportunities based on an individual's capabilities and experience and without regard to race, colour, gender, age, religion, national origin, disability or sexual preference.
- The Supplier shall provide fair and just remuneration to its employees in the context of the labour markets where it operates and ensure that working hours are not excessive and, as a minimum, comply with applicable local laws.

### 1.5 Environmental Sustainability

The Supplier shall adhere to all applicable national and international environmental laws and make sure it obtains the valid required environmental permits and registrations at all times. The Supplier recognises that environmental responsibility is important and shall, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and encourage the diffusion of environmentally friendly technologies implementing sound life-cycle practices and avoiding adverse effects on the community.

### 1.6 Confidentiality and intellectual property

The Supplier shall maintain confidentiality with regard to all confidential and business sensitive information about LeasePlan that they have access to. The Supplier shall not use this information for its own benefit. The Supplier shall protect all intellectual property belonging to LeasePlan, its clients and other third parties and individuals.

### **1.7 Privacy of individuals and data protection**

When processing the personal data of LeasePlan's clients, drivers and employees the Supplier shall respect the individuals' right to privacy and adhere to the applicable laws and instructions provided by LeasePlan. The Supplier shall treat personal data as strictly confidential and shall take appropriate technical and organisational security measures to protect this information against loss or unlawful processing.

### **1.8 Fair competition**

The Supplier shall adhere to all applicable competition laws and, in particular, will not fix prices, rig bids, allocate customers or markets or exchange current, recent, or future pricing information with their competitors.

### **1.9 Conflicts of interest**

The Supplier shall act in LeasePlan's best interest. The Supplier shall avoid contact or conduct that may lead to or could be perceived as creating a conflict between its own and LeasePlan's interest or which could otherwise damage LeasePlan's reputation.

### **1.10 Bribery prevention**

Any and all forms of bribery are strictly forbidden. The Supplier shall not promise or offer anything of value in an attempt to affect LeasePlan's and its employees' actions or decisions in order to gain or retain a business advantage. The Supplier shall have adequate internal procedures in place to ensure adherence to applicable anti-bribery laws.

## **2. Asking questions and raising concerns**

There are several channels in place at LeasePlan to enable stakeholders to ask questions about the topics covered in this Supplier Code of Conduct. We encourage our stakeholders to raise their concerns about suspicious behaviour. Suppliers who believe that an employee of LeasePlan, or anyone acting on behalf of LeasePlan, has engaged in illegal or unethical conduct must report this to LeasePlan. The following channels are available for asking questions and raising concerns:

- Contact a local LeasePlan compliance department;
- Clients, suppliers and other third parties can (anonymously) report possible violations of laws, regulations and/or the LeasePlan (Supplier) Code of Conduct. Please use the contact form on the [www.LeasePlan.com](http://www.LeasePlan.com) website to report any concerns or possible irregularities that you are aware of which may concern or affect LeasePlan in any way. This report will be sent to the LeasePlan Group Compliance Officer and will be handled confidentially;
- For general questions you can also contact a local LeasePlan procurement department.

## **3. Compliance**

LeasePlan may request, at any time, that its Suppliers demonstrate their compliance with the LeasePlan Supplier Code of Conduct.