

Customer Policy



Ekopak
∞ Ekopak Sustainable Water

Together towards
a sustainable future.

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1 Formalizing our values and standards


The identity of Ekopak is not determined by a piece of paper in some drawer but is deeply rooted in our employees, suppliers and customers. Everyone we work with day in and day out must act with integrity according to the values and standards for which we stand. Only then can we speak of a truly sustainable policy. As a company, we provide the necessary safeguards to continuously monitor these values and standards, even when they are under external pressure.

In order to formalize our values and standards, we have penned the "Ekopak policies". These policies form the basis of our culture. By communicating transparently on this matter, we ensure that everyone is well aware of what our DNA is and how to promote it.

In this document **we address our customers**. As a company, we find it important not only to look at our own impact, but also to think about the impact in our chain.

1.1 Policies vs partial policies

A policy is a written expression of a culture. It shows how a company distinguishes between right and wrong, and what processes are put in place to safeguard this distinction. A policy can be stipulated at various levels within the organization.

This document specifies the code of conduct, and contains a more detailed elaboration of how the code of conduct is applied to the way we interact with customers. However, this document will also feature topics that require even more detailed elaboration. These topics will be indicated with a symbol . In other words, the sections where this symbol occurs will be further detailed in a partial policy.

1.2 Active cooperation

Customers are the heart of Ekopak. Our entire business is geared towards being as customer-oriented as possible. The better the relationship with our customer, the stronger our products and services become and the more efficient the collaboration. Our goal is to work with customers who respect our values and standards and, in the best of cases, also strengthen our identity. It is important for collaboration to be in alignment as much as possible. Only in this way will our growth be fostered in a sustainable way.

1.3 Control vs support

This policy was not drawn up to be used as a control document. We believe that each of our customers has the right intentions to conduct an ethical business. Ekopak will not monitor customers for ethical conduct. However, it is our responsibility to correctly inform customers about the values and standards that are important to Ekopak. The intention is to stimulate conversation whereby these values and standards are reflected upon and to show them how the collaborations can go beyond the standard supplier/customer relationship.

In concrete terms, we do this by describing procedures in this policy that aim to ensure that our customers are sufficiently supported to properly understand our way of working:

- Sufficient information so that each customer understands how we enter into long-term partnerships;
- Sufficient moments of reflection offering space to process (deviant) behaviour and;
- A reporting procedure in which both parties can draw attention to problems in a safe manner.

2 Our customers' values and standards

In this chapter, we provide an overview of the legal (general) and company-specific values and standards that Ekopak considers important in its relationship with customers. A distinction is made between general professional decisions and general professional interactions.


- General professional decisions: objective decisions that Ekopak considers to be an important criterion for cooperation, including the procedures for how these decisions are enforced.
- General professional interactions: subjective interactions are supported by a “multiple eye” principle, providing context to personal opinions.

2.1 General professional values and standards

2.1.1 Professional Decisions

Ekopak expects its customers to comply with legislation aimed at combating economic, financial and social crimes among others.


2.1.1.1 Financial and economic decisions

		
No money laundering or terrorist financing	We expect all our customers to comply with money laundering and terrorist financing laws. We will therefore always be alert to unusual transactions and report them to the appropriate authorities. Unusual transactions are defined as customer payments via deposits from unusual account numbers or requests to accept payment with cash. We expect that our customers manage their cash flows responsibly and pay the same attention to unusual transactions that may be indicative of money laundering or terrorist financing.	Customers within the EU follow the directives of the EU, as transposed into local national legislation. Customers outside the EU comply with the international guidelines of the Financial Action Task Force (FATF), even if they are stricter than national legislation.
Complete and faithful accounting	We expect our customers to keep accurate accounts. If the annual account is not publicly available, the customer will make it available on request.	Customers within the EU follow the directives of the EU, as transposed into local national legislation. Customers outside the EU follow their national laws.
Fair tax contribution	Taxes ensure that companies contribute to society. We expect our customers to make a fair contribution and thus comply with direct and indirect tax legislation.	Customers apply national corporate tax legislation. Customers adhere to the international OECD guidelines on the fight against tax fraud.
Acting in line with economic sanctions and trade embargoes	A sanction is a diplomatic or economic tool for putting an end to certain acts or policies, such as violations of international law or human rights, or to change policy when legal or democratic principles are not observed. We expect our customers to be aware of the latest state of affairs in order to be able to make correct decisions within the confines of the law, and to report any possible conflicts.	Customers within the EU apply the European sanctions regimes, customers outside the EU apply the guidelines of the United Nations Security Council on sanctions regimes.


Fair Competition	We believe it is important that all parties we work with comply with antitrust laws and do not intentionally violate competition law. Indeed, these laws ensure that no party can ever acquire a dominant position that prevents competition.	Customers within the EU follow the guidelines of the European antitrust rules
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2.1.1.2 Social decisions

Ekopak considers it important that its customers treat their own employees in accordance with the Universal Declaration of Human Rights as drafted by the United Nations and applicable national labour laws according to the standards of the International Labour Organization. Within this legislation, we would like to draw extra attention to the following areas:

		
Forced and child labour	We choose not to actively cooperate with customers who commit violations regarding forced and child labour.	Customers within the EU comply with national labour laws that are in line with the EU Charter of Fundamental Rights. Customers outside the EU comply with the International Labour Organization's international labour standards.
Freedom of association and collective bargaining	Organising as trade unions is a fundamental labour and human right. Likewise, every person has the right to negotiate working conditions collectively.	Customers within the EU comply with the EU Charter of Fundamental Rights. Customers outside the EU adhere to the standards of the International Labour Organization.
Compliance with the agreed employment conditions	Through collective dialogue, individuals can unite to negotiate the right employment conditions in terms of wages, allowances, working hours and rest periods. These arrangements are combined into collective labour agreements.	Customers within the EU comply with EU labour laws. Customers outside the EU adhere to the standards of the International Labour Organization.
Safe workplace	Safety in the workplace is essential for healthy employees and enshrined in national and international legislation on occupational safety and health. We encourage our customers to closely adhere to these laws and minimize the risk of accidents, injury, abuse, and discrimination.	Customers within the EU comply with the EU directives on occupational safety and health. Customers outside the EU adhere to the standards of the International Labour Organization.

2.1.1.3 Ecological decisions

		
Pollution	Companies engaged in activities that are harmful to the environment must comply with the necessary environmental permits laid down according to national and international legislation. We expect our customers to meet the minimum prevailing standards in terms of soil, water, and air pollution and to closely adhere to this legislation so that any strengthening of the law is immediately incorporated.	Customers within the EU comply with the EU directives on pollution and liability. Customers outside the EU apply national legislation and follow the guidelines of the United Nations.
Protection of land, water and natural resources	We expect our customers not to exploit legally protected lands, oceans and nature reserves and to always make use of other natural resources within the purview of prevailing national and international legislation.	Customers within the EU comply with EU regulations on land use, land use change and forestry. Customers outside the EU apply national legislation and follow the guidelines of the United Nations.
Climate Adaptation	It is important to us that the customer be aware of the EU Climate Law and take the necessary steps to comply with this legislation.	Customers within the EU comply with the EU Climate Law. Customers outside the EU apply national legislation and follow the guidelines of the United Nations.

2.1.2 Professional interactions

2.1.2.1 Bribery

It is important to us that every interaction with the customer be professional and objective. This means that bribery cannot be accepted within the customer relationship. In other words, it is not permitted to offer or accept anything of value to retain business or gain an unfair advantage.

2.1.2.2 Physical or verbal harassment

In dealing with our customers, we do not accept any physical or verbal harassment towards our employees. We expect our customers to act (and negotiate) with appropriate integrity and sensitivity when dealing with others. This goes both ways.

2.1.2.3 Incomplete administration

Prior to collaboration with a customer, Ekopak will always provide a detailed quotation documenting the different steps with their related costs and expected payment date. It is important that the customer carefully review this quotation and understand which costs are included in the quotation and which are not. In this manner, the customer always knows what to expect from Ekopak's employees and also understands that any additional question or appointment is to be reviewed in light of the agreements made.

2.1.2.4 Data processing

All information and data exchanged in collaboration with the customer is treated in accordance with the GDPR guidelines, which are clarified in Ekopak's Privacy Policy.



A description of the handling of information is to be further elaborated in a Privacy policy. This is a work in progress.

2.1.2.5 Conflict of interest

It is important that every decision made in the customer relationship be objective. If personal interests can influence the objective customer relationship, Ekopak will be notified immediately so that the relationship can be viewed from a "*multiple eye*" principle and potential conflicts of interest are recognised in good time.

2.2 Company-specific values and standards

The Ekopak DNA is the “genetic code” that determines what makes us unique as a company, why we do what we do, what we stand for, how we function and how we interact with people. The Ekopak oath (Economic, Ecological, Sustainable) is ingrained in the Ekopak employees.

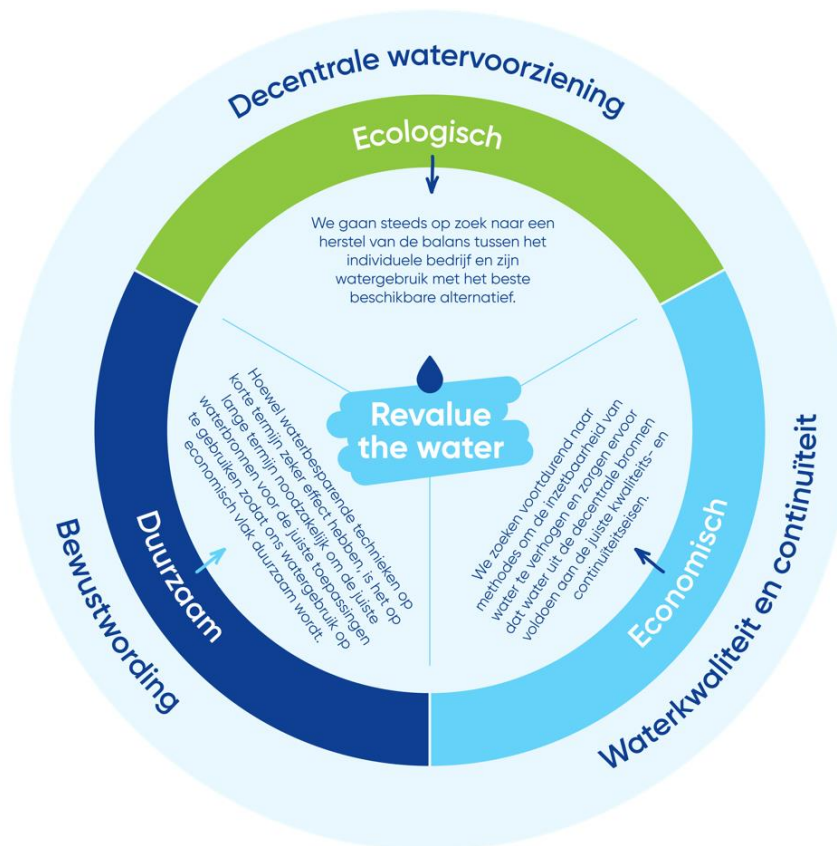


Figure: Ekopak Compass

In this chapter, we once again make a distinction between company-specific decisions and company-specific interactions based on the company compass. The company-specific decisions section provides an overview of the extent to which our company-specific standards and values are in line with those of the customer. The chapter on company-specific interactions formalizes the procedures regarding the interactions that we want to actively stimulate with these customers.

2.2.1 Company-specific decisions

Below we list the aspects that ensure that a customer aligns even more closely with our own DNA.

2.2.1.1 Ecological

Our customers preferably have a green heart. They are aware of their ecological footprint and are actively looking for ideas and methods to reduce it.

2.2.1.2 Economic

Our customers are water consumers for whom the quality and continuity of the water used is important to their core business.

2.2.1.3 Sustainable

Our customers are open to innovative solutions. They look ahead with curiosity and are not afraid to test new methods - in a well-founded and calculated manner. Our customers are not afraid to invest in projects that may perhaps require a bit more effort in the short term but yield exponential benefits in the long term.

2.2.2 Company-specific interactions

The interactions with our customers determine how successful the end result of the decentralised water supply will be. Below is a non-exhaustive list of company-specific interactions.

2.2.2.1 Ecological purchasing policy

Our customers have a purchasing policy whereby the price is only one part of the equation. They know how to weigh the ecological benefits against the economic benefits and know how to compare this balance with other solutions.

2.2.2.2 Open to collaborations

Our customers are open to collaborations with other companies to ensure the continuity of water. They understand that together they are stronger than alone and that collaborations are only possible if a win-win can be created for everyone.

2.2.2.3 Growth mindset

Our customers are curious about out-of-the-box ideas. Although they are critical, they have no problem visualizing new solutions. They understand that we are not going to change the world by doing the same thing over and over again, and are proud to be pioneers. In discussions, they are open to other opinions and they join in the thought process to strengthen projects with their own knowledge.

3 What can customers expect from us?

3.1 General professional values and standards

3.1.1 Professional Decisions

We are aware of all corporate, financial, social and environmental legislation with which we as Ekopak must comply and have zero tolerance for deliberate breaches against this legislation within our own organisation. We keep the right records available at all times to substantiate our *compliance*. As an organization, we are always willing to sign a customer's *code of conduct*, formally pledging to rigorously comply with the appropriate legislation.

3.1.2 Professional interactions

3.1.2.1 Objective evaluations

It is important to us that every interaction with the customer be professional and objective. We maintain a policy whereby bribery cannot be accepted within the customer relationship. In other words, we offer nothing of value to retain business or gain an unfair advantage. In this way, we make it impossible for certain customers to enjoy preferential treatment based on subjective gifts compared to others.

3.1.2.2 Transparent administrative follow-up

We keep transparent records and closely follow up on agreements made. The services provided are charged via invoice, in accordance with the agreements recorded in the quotations. If the quotation consists of a fixed amount, this amount will be charged according to the agreements made. If Ekopak, due to unexpected circumstances, is unable to meet the agreements made due to force majeure, we will proactively contact you and transparently propose alternative agreements.

3.1.2.3 Transparent quality control

We maintain a transparent policy on quality assurance and closely follow up on agreements made in the duly signed quotation. Quality control ensures that the internal operation of the organisation can meet the requirements of customers and regulatory authorities. This is a formalized system that documents processes, procedures, and responsibilities for achieving quality policies and objectives for the work we deliver.



The overview of transparent quality assurance is described in greater detail in the quality policy.

3.1.2.4 Avoidance of conflict of interest

Because we value objectivity in professional agreements, we include a reporting procedure in our employee policy that makes it possible to report conflicts of interest between a customer and an Ekopak employee. This reporting cannot at any time constitute a reason to terminate the cooperation with the customers. However, in the event of a conflict of interest, we will ensure that the account is assigned a new internal controller.



We provide a reporting procedure in our employee policy that makes it possible to report conflicts of interest between a customer and an Ekopak employee. This is a work in progress.

3.2 Company-specific values and standards

3.2.1 Company-specific decisions

Our customers can expect us to comply with the Ekopak DNA as much as possible. We adhere as closely as possible to any company-specific Economic, Ecological and Sustainable decisions. (see chapter 2.2.1)

3.2.2 Company-specific interactions

The interactions with our customers determine how successful the end result of the decentralised water supply will be. Just like our customers, we will comply as much as possible with the predefined company-specific interactions. (see chapter 2.2.2). If the customer were to inform Ekopak about possible deviations in terms of company-specific interactions, Ekopak will investigate such incidents in further detail and rectify the deviation.

4 Supporting Procedures

4.1 General Procedures for Customers

4.1.1 Training

Our salespeople and employees who are frequently in contact with customers receive training within the first 3 months of starting the job whereby they gain insight into appropriate professional collaborations. In addition, they are also provided with tools to recognize any signals that a company is no longer making the correct professional decisions or is no longer engaging in professional interactions. These tools include methods for respectfully making the customer aware of such events.

4.1.2 Internal reporting procedure

If an employee of Ekopak notices an infringement of the matters listed in chapter 2.1, the employee will report this via an internal reporting procedure. Subsequently, in consultation with the relevant manager, it is decided how the observed breach will be communicated to the customer in a respectful manner.

4.1.3 Customer notification procedure

If a customer of Ekopak notices an infringement of the matters listed in chapter 2.1, the customer is encouraged to report this to the whistleblower through the e-mail address report@4legal.be.

If a complaint is received by an employee, it will be followed up adequate and the customer will receive, if applicable, an overview of the steps taken.

4.2 Company-specific procedures for customers

4.2.1 Feedback Moments

Any customer can request a conversation at Ekopak at any time to discuss the collaboration and exchange feedback. We will always actively and immediately use the outcome of this feedback session to improve our products and services.

Independently of the above ad hoc discussions, we make time each year to sit down with each of our customers and evaluate the collaboration. This is a periodic moment when we exchange honest and constructive feedback to strengthen collaboration and the growth of collaboration.

The policies are evaluated by the management team at the following times:

- *Annual Review*
- *In case of changes in legislation*
- *In case of acquisitions*
- *In case of expansion to other countries*

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