



# LUXTRUST

Enabling a digital world

# Supplier Code of Conduct

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Supplier Code of Conduct

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01.00	25-03-2025	SRB	Creation

Approvals			
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01.00	27-03-2025	WBO	Validation

## Supplier Code of Conduct

### Scope

The Supplier Code of Conduct applies to all our suppliers and partners providing goods or services to LuxTrust, as well as to all their employees, agents, and subcontractors during any period in which they provide goods and/or services to us. Certain provisions or specific measures may continue to apply after the end of their business relationship with LuxTrust. These provisions include, among others, the confidentiality of information.

*The requirements set out in this Code of Conduct represent the minimum standards expected by LuxTrust.*

### Purpose of this Supplier Code of Conduct

LuxTrust, including each of its facilities, entities, and subsidiaries, adopts a responsible approach and expects this commitment reflects throughout the entire value chain. This Supplier Code of Conduct aims to promote the progressive alignment of sustainable development policies in order to achieve a collective and responsible approach across our entire value chain.

LuxTrust aims to develop ongoing dialogue with its suppliers to improve practices and foster responsible collaborations. By complying with the applicable legal and regulatory framework and by adhering to fair and equitable practices, the supplier is expected to promote open and constructive dialogue not only with LuxTrust, but also with the suppliers within its own value chain.

Given the nature of its business, LuxTrust places particular importance on confidentiality and data protection, and expects the same level of attention to be paid to these matters by its suppliers.

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A key mechanism that each supplier must implement is one for handling and managing complaints.

LuxTrust requires its suppliers and their employees, agents, and subcontractors (hereinafter collectively referred to as 'suppliers') to comply with all applicable laws and regulations in the geographic areas where they operate, to adopt a responsible approach, and to adhere to the principles set out in this Supplier Code of Conduct.

Particular attention is given to the following points:

### Pillar 1: Respect for human rights

#### **1.1 Compliance with international standards and conventions**

LuxTrust has adopted a Human Rights Policy and requires its suppliers to uphold the highest standards in human rights, as recognized by the Universal Declaration of Human Rights<sup>1</sup>, the conventions of the International Labor Organization<sup>2</sup>, and all other applicable international<sup>3</sup>, national, and local regulations.

#### **1.2 Combating forced labor and child labor**

LuxTrust will exclude any contractual relationship with suppliers that fail to comply with regulations concerning **forced labor** and **child labor**, in accordance with article 6 of ILO Convention n°138 on the minimum age. Suppliers are prohibited from engaging in human trafficking, or from using undeclared labor or forced labor, in accordance with ILO Conventions n° 29 and 105.

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<sup>1</sup> [Universal Declaration of Human Rights \(United Nations, 1948\)](#)

<sup>2</sup> [Declaration on Fundamental Principles and Rights at Work \(ILO, 1998\)](#)

<sup>3</sup> [Tools and references - Ministry of Foreign and European Affairs, Defense, Development Cooperation and Foreign Trade - The Luxembourg Government](#)

## Pillar 2: Labor relations and working condition

### **2.1 Fair employment practices**

By signing the Supplier Code of Conduct, and in accordance with articles 23 and 24 of the Universal Declaration of Human Rights, the supplier declares that employment contracts are up to date and comply with the applicable labor laws. This includes, in particular, compliance with **legal working hours** and **minimum wage** requirements, in order to ensure workers receive a **decent wage**<sup>4</sup>. Suppliers also commit to compensating overtime and to refraining from using wage withholding as a disciplinary measure.

### **2.2 Declaration, Reporting, and Audit Compliance**

The supplier declares that it fulfills its obligations regarding **declarations** to the relevant local **social and tax authorities**.

Suppliers must comply with the reporting and audit requirements set out in the permits and regulations applicable to them.

### **2.3 Principle of non-discrimination**

The supplier commits to respecting the **principles of non-discrimination** in accordance with applicable laws related to hiring and employment. It also undertakes to promote **professional equality** and **diversity** both within its organization and across its value chain.

The supplier agrees to implement an **anonymous complaint mechanism** to address all forms of discrimination, harassment, or abuse in the workplace.

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<sup>4</sup> The Universal Declaration of Human Rights (Article 23) states that 'Everyone who works has the right to just and favorable remuneration ensuring for themselves and their family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.'

Furthermore, a decent wage is a key issue for the UN Global Compact, as it directly advances several Sustainable Development Goals (SDGs), particularly SDG 1 'No Poverty', SDG 5 'Gender Equality', SDG 6 'Clean Water and Sanitation', and SDG 8 'Decent Work and Economic Growth'.

#### ***2.4 Professional development and social dialogue***

The supplier commits to developing its human capital by enabling each of its employees to enhance their skills through **training** and to support their **professional growth**.

The supplier also commits to respecting **freedom of association** and to fostering **social dialogue**.

#### ***2.5 Health and Safety Risk Prevention***

The supplier implements all necessary measures to prevent and address **health and safety risks** affecting its employees, subcontractors, clients, and any communities that may be impacted by its negative effects. A continuous improvement plan must enable regular risk assessments, to drive ongoing progress.

### **Pillar 3: Commitments to Integrity and Professional Ethics**

Respect for the principles of integrity and business ethics is essential to our CSR approach. LuxTrust has made strong commitments to ensure the integrity of its operations.

#### ***3.1 Combating corruption, influence peddling, and conflicts of interest***

The supplier undertakes to identify, prevent, and disclose any situations involving an actual or potential **conflict of interest** with or any of its representatives. A conflict of interest arises when an individual has a private or personal interest that may appear to influence their decisions in a professional context.

LuxTrust condemns all forms of **corruption**. Its relationship with suppliers is strictly conditional upon their rejection of any act of corruption or of behaviors that could be considered complicity, influence peddling, or favoritism. With regard to **gifts** and **invitations**, transparency is essential. Employees and consultants of LuxTrust must adhere to the group's Gift Policy.

### ***3.2 Anti-money laundering and financial records***

The supplier complies with all applicable laws and regulations designed to combat **money laundering activities**. The supplier establishes and maintains financial records and reports in accordance with international anti-money laundering laws and regulations.

The supplier commits to upholding **fair competition practices** and, in this regard, ensures equal treatment of its own suppliers, making purchasing decisions based on an objective and comparative evaluation of the integrity and reliability of its suppliers. The supplier also complies with all applicable laws and regulations relating to competition law.

### ***3.3 Confidentiality and data protection***

The supplier complies with all applicable laws and regulations relating to **data protection and security**, particularly with regard to the personal data of clients, employees, and shareholders.

The supplier adheres to all relevant requirements when collecting, processing, transmitting, and using personal data.

### ***3.4 Implementation of a Business Continuity Plan and Corrective Action Process***

The supplier must be prepared to respond to any disruption to its operations (such as natural disasters, terrorism, malware, pandemics, or disease outbreaks) by implementing a **business continuity and crisis management plan**. This plan should include emergency response procedures designed to protect people, facilities, and the environment.

The supplier must also implement a process to address any deficiencies or violations identified through internal or external audits, assessments, inspections, investigations, or reviews.

### ***3.5 Duty to Inform***

Throughout the duration of the contract, the supplier undertakes to act with transparency by submitting a written statement informing LuxTrust if any of the following situations occur: conviction for corruption, influence peddling, unlawful conflict of interest, embezzlement of public funds, favoritism, or any breach of integrity.

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The supplier undertakes to inform its employees of the procedures for accessing its own whistleblowing system and/or the **whistleblowing system** established by LuxTrust, in order to report any serious violations of human rights, fundamental freedoms, or health and safety at work, including the protections granted to whistleblowers in accordance with applicable local and international standards.

## Pillar 4: Environmental Protection

The supplier is committed to the preservation of our planet and undertakes to implement the following measures.

### ***4.1 Compliance with Environmental Regulations***

The supplier commits to complying with the applicable **environmental regulations** and ensures the proper integration of its activities within its natural environment.

It strives to establish a process for identifying, assessing, and improving the environmental impacts resulting from its activities.

### ***4.2 Reduction of Greenhouse Gas Emissions***

The supplier commits to identifying, managing, and reducing the greenhouse gas (GHG) emissions generated by its activities. It must be able to regularly quantify its GHG emissions, define reduction targets, and monitor progress made in climate protection. The supplier agrees to share this information for the entire duration of the contract.

### ***4.3 Reduction of Energy Impacts***

The supplier undertakes to implement actions aimed at identifying, assessing, and reducing its energy impacts through its purchases, in the design of its products and services, and by raising employee awareness on best practices for energy performance.



**4.4 Natural Resources, Biodiversity, and Impact Reduction**

The supplier commits to making its best efforts in **the management of natural and mineral resources**, to **preserving biodiversity**, and to **preventing soil, water, and air pollution**. It promotes recycling or reuse in order to limit the production of **waste**.

The supplier agrees to **integrate these environmental requirements** into the **purchase of products and services**, as well as into the design and implementation of its own products and services, in order to reduce its environmental impact throughout the product life cycle, while maintaining or improving quality whenever possible.

## Implementation: reporting of breaches or violations

In order to ensure the identification and management of risks, LuxTrust establishes a dialogue with its suppliers and partners to monitor the effective implementation of this code. A questionnaire will be sent regularly to strategic suppliers and partners to ensure proper application of the Supplier Code of Conduct.

However, when this document alone is not sufficient to guarantee compliance with the values it contains, LuxTrust and its suppliers agree to adopt an appropriate approach to address any breaches or violations.

The supplier undertakes to promptly inform LuxTrust in writing of any known or suspected violation of this code, particularly in cases of illegal activity or human rights violations.

Any person who becomes aware of a failure to meet the expectations outlined in this Code is required to report any actual or suspected misconduct to LuxTrust.

Cases of non-compliance may be reported to the following email address:

**[whistleblowing@luxtrust.lu](mailto:whistleblowing@luxtrust.lu)**

All questions and concerns raised are handled seriously and confidentially.

### ***Non-retaliation***

LuxTrust emphasizes that retaliation against anyone who, in good faith, raises questions or concerns is not tolerated.

### Supplier Code of Conduct Acceptance Form

By signing, the supplier accepts the pillars and principles of the Supplier Code of Conduct and commits to implementing a continuous improvement approach to ensure compliance.

The supplier also undertakes to promote these principles among its employees, service providers, and subcontractors, and to ensure that they are respected.

Specifically, the supplier acknowledges and confirms that its company’s commitment to human rights and environmental protection aligns with that of LuxTrust and undertakes, at a minimum, to comply with national regulations and the international standards of the International Labor Organization (ILO).

<b>Supplier Name</b>	
<b>Full name of Signatory</b>	
<b>Position of Signatory</b>	
<b>Does the company have a Supplier Code of Conduct?</b>	
<b>Location</b>	
<b>Date</b>	
<b>Authorized Representative’s Signature</b>	

## Sustainability Awareness Proposal by SPARK, the United Nations Global Compact's learning community

As a member of the United Nations Global Compact, we would like to invite all our suppliers to participate in the SPARK Community, an educational initiative created by the United Nations Global Compact. This platform provides training and knowledge exchange to help small and medium-sized enterprises (SMEs) integrate sustainability into their core business operations (the four one-hour awareness sessions on sustainability are in English and accessible year-round).

The SPARK program is offered several times a year, generally from April to December, and is free of charge for our partners.

The awareness cycle covers the following content:

- 1- Building a sustainable foundation
- 2- Developing a practical sustainability plan
- 3- Applying sustainable practices in operations
- 4- Measuring results and scaling impact

If you are interested in participating in this program or would like to learn more, please contact us at [sustainability@luxtrust.lu](mailto:sustainability@luxtrust.lu) for further information.

You can also visit the [official SPARK Page](#) to explore the full offering.

*« Collaboration sparks innovation, and strong relationships give rise to the successes of tomorrow. Our suppliers are essential partners in overcoming challenges and building a resilient future together. »*