

CODE OF CONDUCT

for Infrabel's suppliers and contractors

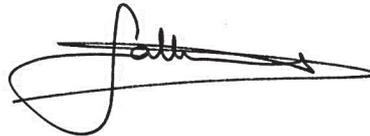


PREFACE

Infrabel, one of the main players in sustainable mobility in Belgium, intends to pursue a responsible purchasing policy that meets the company's needs and priorities. This approach is an integral part of our CSR (Corporate Social Responsibility) policy and also aims to support the Sustainable Development Goals (SDGs) defined by the UN.

With this in mind, Infrabel pays particular attention to relations with its stakeholders. This includes expecting its Suppliers (1) to comply with the laws, regulations and rules in force in the countries where they operate. Infrabel also expects them to respect the principles set out in this Code of Conduct and to do everything possible to conduct their activities with respect for people and the environment.

Infrabel counts on the collaboration of all its Suppliers to contribute to developing more sustainable mobility than ever.

A handwritten signature in black ink, appearing to read 'Luc Lallemand', with a stylized flourish extending to the right.

Luc Lallemand
Managing Director

(1) By Supplier, in this Code we mean suppliers of goods, service providers or works contractors

1. CONTEXT

As a public company, Infrabel is already subject to very strict criteria designed to prevent any favouritism or corruption with regard to its Suppliers. Infrabel wants to go further by also imposing, as far as possible, environmental, social or ethical conditions on its Suppliers. These specific conditions depend on the type or scope of the contract to be concluded. They are described either in the publication (contract notice or qualification system) or in the specifications:

In the invitation to tender

1. Selection criteria
2. Exclusion criteria

In the specifications

1. Award criteria
2. Tender regularity criteria
3. Performance conditions

In order to ensure that this Code of Conduct forms the basis for open and transparent collaboration, Infrabel may request additional information or conduct audits of its Suppliers at any time, either on its own behalf or through a third party it has designated.

Any successful tenderer may be subject to an evaluation of its services in the context of the performance of one or more contracts with Infrabel. This evaluation covers several areas, including customer focus, commercial attitude, quality of services or compliance with Infrabel processes (safety, quality,...).



2. INFRADEL GUARANTEES THE FOLLOWING ON BEHALF OF ITS SUPPLIERS:

A NON-DISCRIMINATORY ATTITUDE

As a public company, Infrabel is subject to public procurement regulations that impose strict selection and award criteria and procedures. Suppliers are therefore chosen without discrimination.

EQUAL TREATMENT AND OPENNESS TO COMPETITION

In addition, Infrabel employees follow the principles and guidelines described in the Code of Conduct for Public Procurement and Contracts and ensure that the technical specifications and other documents allow Suppliers equal access to the contract and do not create unjustified obstacles.

COOPERATION BASED ON RESPECT

Infrabel is committed to treating its Suppliers in a respectful, ethical and transparent manner.

CONFIDENTIALITY

Subject to legal obligations, Infrabel ensures the confidentiality of any information received from its Suppliers, unless it is mentioned clearly that the information is public.

OPEN DIALOGUE

Infrabel considers dialogue with its stakeholders to be an essential part of its overall strategy. It thus establishes various proactive and reactive dialogue processes with these stakeholders, including Suppliers.



3. INFRABEL EXPECTS FROM ITS SUPPLIERS:

3.1. SAFETY

Safety is Infrabel's first priority. It thus requires a solid and transparent partnership with all people – including Suppliers – who have a direct or indirect impact on operational safety, including operations, workplace safety and the safety of property and equipment.

Infrabel therefore expects its Suppliers:

- to have an on-going, constructive and honest dialogue, and to report any anomalies observed, presumed or potential, and also to make suggestions for improvements, regardless of whether or not these are related to its own services or products;
- to always take account of all the people concerned by operational safety (commuters, workers, local residents, subcontractors etc.);
- to be proactive in the application of the law of 4 August 1996 relating to the well-being of workers during the execution of their work and to be attentive to all the factors relating to the conditions in which work is carried out, for both products and services: safety at work, protection of workers' health, workplace stress, ergonomics, occupational health, workplace improvements and environmental measures;
- to respect and apply Art. 12 et seq. and Art. 78 of the RD of 14 January 2013 establishing the rules of execution of public contracts, as well as details in the specifications relating to the legislation on operational safety, and to make every effort to contribute to the well-being of workers during the execution of their work at the sites.



3.2. HUMAN RIGHTS AND WORKING CONDITIONS

Infrabel expects the Supplier to comply with international standards concerning human rights and the International Labour Organisation's declaration on fundamental principles and rights at work. The Supplier must not be complicit in any human rights violations. It ensures that rules and procedures are applied, both at its own production sites and at its subcontractors and suppliers, which:

- exclude child labour;
- eliminate all forms of forced or compulsory labour;
- recognise workers' freedom of association and do not judge or discriminate against members of workers' organisations or trade unions;
- exclude all forms of discrimination, both in recruitment and in the workplace;
- ensure that everyone is treated with respect, eliminating any unacceptable behaviour such as bullying or sexual harassment;
- guarantee that the laws in force concerning remuneration and working hours are respected.

3.3. ENVIRONNEMENT

Infrabel expects the Supplier to act, at the very least, in accordance with the legal and international standards in force in terms of environmental protection. The Supplier must always attempt to reduce its impact on the environment, especially by opting for technologies and procedures which respect the environment, with a view to promoting the community's sustainable development. An environment management system helps it to constantly improve its services in this area.

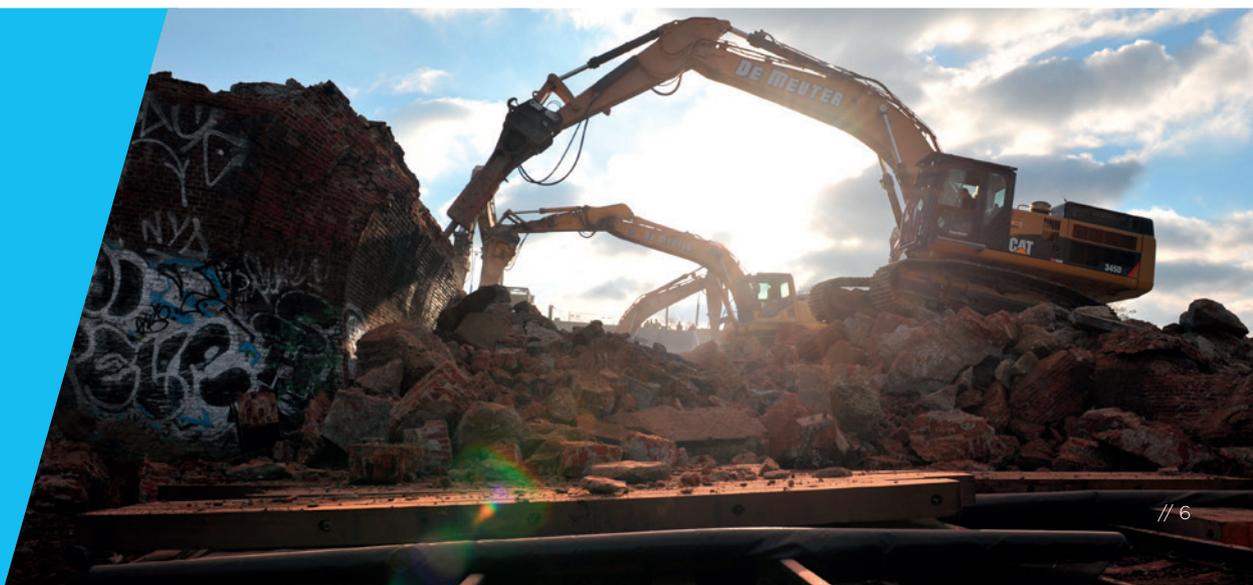


3.4. CORRUPTION AND CONFIDENTIALITY

Infrabel expects Suppliers to:

- apply the highest ethical standards, both professionally and personally, in accordance with this Code of Conduct and all applicable laws and regulations;
- always respects the confidentiality of information received from Infrabel and does not communicate any confidential information to third parties, except with Infrabel's express authorisation. When a contract is awarded, the Supplier shall organise all contact relating to the contract via the competent department defined in the invitation to tender and the special conditions. No information is exchanged with other Infrabel departments;
- eliminate all forms of corruption, blackmail or fraud. It will provide Infrabel with any information relating to conflicts of interest arising from the involvement of an Infrabel employee in one of its companies. It does not offer gifts or benefits to Infrabel employees. These would influence the course of negotiations or the execution of contracts with Infrabel;
- comply with the obligations of Infrabel staff in charge of the award or the execution of public procurement and contracts. These obligations are set out in the Code of Conduct for Public Procurement and Contracts, the content of which is provided in the Appendix.

Any Supplier that does not comply with these conditions may be excluded from future tenders.



Questions ?

If you have any questions about the content of this document, please do not hesitate to contact our Procurement Department.

REFERENCES:

International Charters and Declarations:

- The UN's Ten Principles
- The UN Sustainable Development Goals (SDGs)
- Universal Declaration of Human Rights
- ILO Declaration on Fundamental Principles and Rights at Work

Legal framework:

- Conflicts of interest: article 6 of the law of 17 June 2016 on public procurement
- Public works: art. 12 et seq. and art. 78 of the Royal Decree of 14 January 2013 laying down the rules for the performance of public contracts
- Well-being: Law of 4 August 1996 on the welfare of workers in the performance of their work
- Code well-being at work
- Technical Specifications: Art. 53 et seq., Law of 17 June 2016 on public procurement.
- General Data Protection Regulation (GDPR): Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016

Infrabel:

- Code of Conduct for Public Procurement and Contracts
- Diversity Charter