SBE Code of Conduct & Ethics

Version 2025

SBE (HQ)
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1 Introduction

At SBE, we are committed to sustainable development, ethical business conduct, and respect for people and the environment. This code affirms our dedication to upholding all relevant legal and regulatory standards (e.g. UNGP), but it also goes beyond legal compliance fostering openness in our operations, and actively preventing unethical conduct or improper practices throughout our own operations and client projects. It describes the minimum standards expected across the entire organization, regardless of the country of operation.

Besides stating our commitment as an employer towards our employees and society, this code of conduct also outlines our expectations for all employees, consultants, external partners, suppliers, clients, contractors, and subcontractors, who contribute to our operations and projects. All partners are expected to align with these principles as a condition of doing business with SBE.

Our values, our behavior!

Or, how we as a company express our DNA building blocks:



Assuring quality



Designing as one team



Building a family

These values characterize us as a company and clarify 'who we are' and 'what we stand for'. They are an integral part of our daily activities and define what we look like as a professional player. Together, they form the DNA of our organization and the building blocks for our Code of Conduct & Ethics.

The code sets out how we strive to always remain true to our SBE values in day-to-day practice, thus also contributing to the SBE corporate culture. It focuses on human rights, and has a zero tolerance for corruption, fraud en bribery.

As part of our "Sustainable Development Goals" or SDG-track, links were made to the corresponding SDGs wherever possible.

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Figure 1: United Nations Sustainable Development Goals

This Code of Conduct is also included as an addendum to the employment regulations.

Through our Code of Conduct, we actively engage our subcontractors, major suppliers, and consultants to promote ethical and sustainable practices within their own supply chains. By requiring key partners to sign this code, we reinforce our expectations around human rights, fair labour conditions, and environmental responsibility across the broader value chain.

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2 Our values, our behavior

Under the motto “Our values, our behavior”, we strive to grow together sustainably and create added value for all stakeholders in order to collectively contribute to the future of our organization.

2.1 Assuring quality



Assuring **quality** is undeniably our main driver.

This is reflected in how we deal with:

Projects

Projects are SBE’s source of income. Everyone is therefore also expected to do their best in their work area to deliver correct and high-quality project components. This be it preparatory (quotations, etc.) executive (calculation notes, plans, etc.) or closing (reports, invoicing, etc.) activities.

Safe working environment

Both in our office environment and on the construction sites, safety is a daily concern on which our focus must always be targeted. SBE is committed to providing a safe and healthy working environment for all employees, subcontractors, and visitors.

In our offices, much attention is paid to ergonomically designed workstations in a pleasant setting with attention to greenery.

We also continue to build a safety culture where safety awareness is top priority of our employees. We implement and continuously improve safety protocols and risk assessments to prevent accidents and occupational hazards. Everyone is expected to comply with these safety measures, report unsafe conditions, and contribute to a culture of prevention and care.

Also during the design process of the projects entrusted to us, SBE pays close attention to the safety of the end users of the designed installations or infrastructures.

When choosing or recommending the practical implementers of our projects, we give preference to those who can demonstrate that safety is as high a priority with them as it is with SBE.

Financial assets

Within SBE, not only the finance and accounting staff play a role in ensuring complete and accurate financial records. Within the responsibilities of their own position, everyone in the company is expected to handle the budgets entrusted to them with integrity and thoughtfulness in order to contribute to keeping the company financially sound.

New technologies

SBE is a frontrunner in tapping into and implementing new technologies. It is therefore a mission for all employees to be persistently alert to new developments within their field of expertise.

Knowledge management

SBE has established its own academy, which is developed and managed by enthusiastic employees. They are responsible for the development of their own knowledge domain with the aim of achieving qualitative output that can be used organization wide. In addition, these knowledge managers manage the training catalogue within SBE.

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This approach ensures that existing know-how as well as uniform working methods are quickly disseminated within the company. In this way, SBE tries to guarantee its objective of providing high quality services to all stakeholders. <SDG 17>



Environment & sustainability

Sustainability is a key ambition at SBE, deeply embedded in our core mission to design projects that support long-term sustainable development. Besides social and economic sustainability aspects, this includes our commitment as an organization to minimize our impact on the environment and climate, both in our own operations as in our client projects.

We do this through our environmental and carbon management systems (ISO 14001 and CO_2 Performance ladder) that support us in reaching net-zero emissions by 2035 <SDG 13>.



We also strive to design sustainable. Within SBE, SPIRIT was developed, our own sustainability scoring tool that visualizes sustainable improvement opportunities for our projects, <SDG9> and <SDG12>. With these tools, we can assist our clients in making in environmentally friendly choices from the start of a project <SDG17>.

Our commitment to the environment has been stated in the quality and environmental policy.







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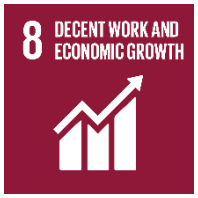
2.2 Designing as one team

Designing as one team is THE starting point for SBE as a project-based company

That is why we attach great importance to:

Team-player mentality of all employees

The projects processed within SBE usually have as common denominators: Challenging – Complex – Multidisciplinary. The only way to bring these types of projects to successful completion is a thorough team approach based on a horizontal structure (ECO1.1). All employees are therefore expected to continuously work together as one. <SDG 8>



Encouraging creativity and positive feedback culture

"Out of the box" thinking is the credo within SBE's design teams. All employees are encouraged to actively "think along" at the various stages of a design.

Several tools are available within SBE encouraging positive feedback between colleagues. All employees also have a team coach who offers them guidance in their development within the company. This way, employees raise each other and themselves to a higher level. <SDG 9>



Relationship with our clients

Good cooperation with our clients ensures that projects run as smoothly as possible. To achieve this, it is very important that project managers make clear agreements with the client from the start of a project regarding scope, deadlines, responsibilities and mutual expectations.

We are committed to complying with generally accepted business standards, regulations and laws in dealing with all our business partners. We also expect our business partners to adhere to business principles consistent with internationally acceptable standards. <SDG 17>



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Honesty and integrity

All SBE employees are expected to act ethically and with integrity. This indicates that we take into account norms and values as well as different views on them. Decency, honesty, reliability and empathy are among our core values.

We deal openly, transparently and honestly with our business partners and shareholders.

Correct communication internally – externally

Open and correct communication is indispensable as a basic tool of teamwork.

External communication to clients and business partners should be businesslike, polite, clear and honest.

When communicating online, employees should act mindful as their posts may reflect on the company, clients, and colleagues. Online conduct should align with SBE's values and avoid any potential conflicts of interest.

In internal communication, within the bounds of decency, a more familiar tone can be adopted that is nevertheless always clear, honest and respectful <SDG 16>.



Duty to report malpractices

Anyone who suspects or observes the existence of wrongdoing within the working environment of SBE or when dealing with external partners, has a duty to report it to the management. Reports must be made according to the provisions set out in the whistleblower policy.

The management commits to invariably investigating these reports and not taking disciplinary actions against the whistleblower <SDG 16>.



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2.3 Building a family

The **family character** within SBE serves as a foundation for a positive and pleasant working atmosphere.

Important are therefore:

Treating each other with respect

Within SBE, we strive to provide a working environment where there is no physical or verbal harassment. Discrimination based on age, race, religion, gender, sexual orientation or disability is not allowed. Respectful is the code word here.

With regards to the above matters, zero tolerance is the default. <SDG 5> en <SDG 10>





Taking into account the local culture of all offices

The SBE offices are geographically distributed; within Belgium in different regions and also in the Netherlands and Spain. Each region and/or country has its customs, labor laws, etc.. SBE is committed to sharing its culture with its employees through regular exchanges and intense cooperation, in addition to the local legislation <SDG 10>.



Exercise and sports

'Mens sana in corpore sano' or 'A health mind in a healthy body' is a well-known motto that is also taken to heart within SBE. An enthusiastic group of colleagues set up the "SBE-FIT" working group and set themselves the goal of putting this motto into action, in all the company's branches <SDG 3>.



Physical and mental health of all employees

Physical health of our employees is something SBE is strongly committed to as an employer. In addition to working closely with the occupational physician, the company is also committed to encouraging healthy eating, as well as the ergonomic design of workstations.

SBE is acutely aware that complex project work can be mentally demanding. Monitoring employees' mental well-being is therefore of paramount importance.

Regular questioning keeps a finger on the pulse, so that targeted preventive actions can be taken. <SDG 3>

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Work-life balance

Being able to physically and mentally leave work outside working hours is important for well-being. Various actions are therefore taken to best support our employees' work-life balance. For instance, there is the possibility of occasionally working from home and we use the principle of flex time, in order to better align work and private life. SBE is also aware that the bow cannot always be bent. As a part of this philosophy the Teambuilders & SBE-FIT initiatives were created. At SBE, there is a principle of a 40-hour week where the aim is to make overtime the exception rather than the rule <SDG 3>.



Equality, diversity and inclusion

SBE sees diversity as an enrichment. A mix of demographic differences (age, gender, sexual diversity, culture), physical abilities but also difference in characters, educational level professional fields, etc. is deliberately sought. We engage with this mix in an inclusive way. We leverage the diversity and intrinsic talents of each employee to create an organically balanced working environment. <SDG 5> and <SDG 10>



SBE is committed to treating all employees in a completely equal manner, both in terms of organization and pay policy.

Gender balance is also monitored as best as possible when filling out the team structure. <SDG 5>



Respecting the personal privacy

SBE recognizes and respects the importance of privacy of personal information of all its employees. To this end, only personal information necessary for business purposes is collected and processed, and this in strict compliance with the applicable "General Data Protection Regulation (GDPR)". The same standard is maintained in the recruiting process.

To this end, a Data Protection Officer (DPO) has been appointed within the company to inform, advise and act as a point of contact for management <SDG 16>.

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Respecting human rights

For SBE, “Corporate Social Responsibility” is not an abstract concept.

In the context of respect for human rights, SBE guarantees for all its employees: right to equality and non-discrimination, inviolability of his person, right to a healthy working environment & protection of personal life sphere. <SDG 5> en <SDG 10>



There is also a strong commitment to achieving correct working conditions within all the branches of the company. SBE will take prompt, effective action to address and prevent any potential or actual harm we identify.

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3 Commitment of all employees

- Each employee is expected to act in accordance with our corporate values and respect all company policies and guidelines in the performance of daily work.
- An employee is not permitted to speak on behalf of SBE in the media or make public statements except for approved business purposes.
- Each employee is encouraged to exercise caution when using social media and keep personal and professional life online separate.

Conflict of interest:

- Each employee shall avoid conflicts of interest in his relationship with customers, employees, suppliers and all other business partners and is expected to act with integrity. Such a conflict of interest can be any situation in which personal interests could interfere with their professional responsibilities or influence decisions made on behalf of the company.
- Where the employee holds or works with information of other stakeholders, he must ensure that it is properly protected in accordance with SBE's data security policy.
- If an employee finds themselves in a potential or actual conflict of interest, they are required to promptly inform their supervisor and seek guidance on how to proceed.
- No employee should use or disclose confidential or proprietary information without proper authorization and a valid business reason. This could harm SBE's business or that of our customers/partners.

Integrity of financial data:

- Communication of financial information to persons outside the company is prohibited, except by those authorized within the company for this purpose.

Interaction with colleagues:

- Every employee should behave professionally in all circumstances and treat colleagues with respect and dignity.
- Every employee is expected to carry out their work in a safe manner and free of alcohol and drugs.
- Each employee is responsible for identifying, communicating and controlling risks to prevent accidents and minimize losses.
- No form of inappropriate behavior at work will be tolerated by SBE.

Electronic communication technology:

- SBE employees use all electronic communication technology responsibly and professionally, protecting the company's interests and reputation.
- Each employee protects our networks and information systems by following all security measures, especially when working remotely, as specified in the SBE Data Security Policy.
- We are committed to protecting the privacy of customers, suppliers and employees.

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Dealing with customers and business partners

- Bribes in any form, retributions, travel accommodation or other gratuities in order to conclude a contract are neither offered nor accepted from existing or potential customers, suppliers or other business partners.
- Offering or accepting undue advantages (directly or through third parties) to gain favorable treatment or influence negotiations is strictly prohibited.
- All business gifts received within SBE are collected from the human resources department and raffled among all employees annually on the occasion of a corporate event.
- Commercial agreements must always be in line with our ethical values. We have a zero-tolerance policy on all forms of bribery, corruption, fraud, extortion and embezzlement.
- No employee should support customers, suppliers or other business partners, nor their owners or employees, in actions that are not in line with ethical business practices and tasks or other legal requirements.
- SBE strictly prohibits any form of anti-competitive conduct, including price-fixing, market sharing, or other agreements that restrict fair competition.
- When doing business internationally, prior research is conducted on the customs within local cultures to avoid misconceptions afterwards. SBE also distances itself from all forms of corruption, both active and passive.

Dealing with government officials

- Government officials or representatives should not be approached in a manner inconsistent with their official duties.
- No excessive gifts or other gratuities may be offered to government officials or accepted by an employee.
- No payment of bribes may be made to a government official or accepted by an employee.

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4 Third parties

Besides our own efforts and the commitment of our employees, we also expect our business partners to take appropriate measures to protect the rights of their employees and those of any hired subcontractors. Thus, we want to ensure that our supply and value chain is safe and our business partners also are ethically and environmentally friendly.

Upholding fundamental human rights and ensuring fair working conditions are mandatory standards for all suppliers and business partners collaborating with SBE. They are expected to encourage these principles throughout their own supply chains.

Safe working environment

- SBE expects its business partners to be committed to employing their employees, hired staff, subcontractor personnel etc. in safe and healthy working conditions consistent with nationally accepted standards. Safety is a shared responsibility and a fundamental part of every project we undertake. We expect all suppliers, contractors, and subcontractors to actively promote a strong safety culture, one that goes beyond compliance and fosters awareness, accountability, and open dialogue.
- All parties must ensure that their teams work in conditions where risks are identified, minimized, and, wherever possible, eliminated. This includes providing proper training, protective equipment, and adhering to all applicable health and safety laws and standards. We value environments where individuals feel empowered to speak up about unsafe situations without hesitation. Our collective goal is zero incidents. Because we believe safety is not negotiable.



Environment & sustainability

- The last few years a lot of steps have been taken to reduce our environmental impact (https://www.sbe-engineering.com/en/sustainability/) . All business partners working with SBE are expected to integrate sustainability into their operations and prioritize environmental care in every aspect of their work, continuously seek opportunities to minimize emissions, manage resources efficiently, and prevent environmental harm. Protecting the environment is a shared responsibility across our entire value chain.



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You are part of our supply chain,

SBE counts on your commitment

Fair work

- We require that our business partners at least comply with minimum wage regulations and provide wages that fairly reflect the work performed. Paying fair wages is fundamental to respecting the dignity and well-being of every worker involved in our operations and supply chain.

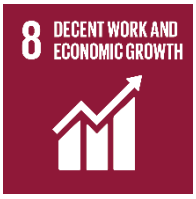
Non-discrimination

- SBE is committed to providing a workplace where everyone has fair and equal access to opportunities, free from discrimination based on personal background, identity, characteristics or beliefs.



Human rights

- SBE upholds the fundamental rights and freedoms outlined in the United Nations Universal Declaration of Human Rights. We strictly prohibit child labor, inhumane working conditions or forced, illegal labor, and any form of human trafficking in our operations and expect the same commitment from our business partners.
- We ensure compliance with all applicable laws regarding the minimum age for employment and are committed to ensuring that children are never employed, either directly or indirectly, even in countries where legislation on this matter is absent or poorly enforced.
- SBE condemns any involuntary or exploitative labor practices (e.g. excessively long working hours, and lack of access to basic rights such as rest breaks, sanitary facilities, or adequate housing).
- In addition, we also expect our business partners to adhere to the other ethical guidelines already discussed above, even when local legal requirements are less stringent than those described in this code of conduct.



Data

- As a knowledge-driven engineering company, SBE handles large volumes of sensitive project and client data, making privacy and cybersecurity critical. While our IT team maintains strong security measures, we recognize that cyber threats are inevitable, requiring ongoing vigilance from everyone. To manage this risk, we have two key policies: the GDPR Data Protection Policy and the Data Security Policy.

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- SBE processes both commercial and personal data and is committed to complying with EU and national data protection laws. We established clear responsibilities for our organization and its employees, and ask our business partners to follow these as well.

Whistleblowing

- SBE encourages both employees and external parties to report any suspected misconduct, policy violations, or unlawful activities. Reports can be made confidentially through our whistleblower system (https://whistle-eu.suprchrgd.com/program/sbe-engineering/) , in line with Belgian and EU legislation. The system ensures the protection of whistleblowers against retaliation and guarantees that all reports are taken seriously and investigated appropriately.



SBE reserves the right to assess compliance or conduct audits in case of alleged misconduct and request corrective actions if standards are not met.

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5 Compliance

- Day-to-day responsibility for compliance with this ethics & code of conduct is delegated to the management of each region. They are responsible for ensuring compliance with this code. We expect all managers to lead by example and actively support their teams in understanding and upholding the Code of Conduct.
- Compliance with the code of conduct is not optional; every employee has a responsibility to comply with the code of conduct, laws, regulations and international standards and help others do the same.
- All SBE employees are ambassadors of our ethical values, representing the company not only through the work they do but also through their behavior, both in the workplace and, to some extent, beyond it.
- If an employee undermines the integrity of SBE, its employees or business partners through unfair or illegal practices, actions may be taken if necessary.
- This code is subject to review by SBE's co-CEOs. Ultimate accountability for the Code and its implementation lies with SBE's CEOs
- Business partners (suppliers, subcontractors,…) will be reminded to comply with this code. If there are indications or concerns that the Code of Conduct has been breached, we will initiate a thorough review and take appropriate steps to address and resolve the issue. Failure to act in accordance with this code may result in termination of cooperation.
- It is not possible to include every occurring situation in this code of conduct. If You nevertheless come across a situation that might not be in line with this code, please contact the HR coordinator.



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SOLEMN DECLARATION OF COMPLIANCE WITH THIS CODE OF CONDUCT

_____(company name) with registered office in _____ (country) at _____ (ZIP code) _____ (city), _____ (street and number), hereby represented by_____(name representative), _____ (job title representative), hereby solemnly declares:

Solemn declaration regarding compliance with the Code of Conduct of SBE.
Non-compliance may result in termination of cooperation.

Drawn up by the undersigned.

_____ (place), [dd/mm/yyyy].

Signature

_____Name
_____Job Title

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