



# Supplier Code of Conduct



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| Author: General Counsel | Management Board adoption:<br>September 22 |
| Version 2025            | External Policy                            |

## Introduction

This Supplier Code of Conduct sets out the expectations of Exact towards all suppliers in its supply chain and provides principles of ethical business behaviour, in line with our company values: Keep Raising the Bar, Welcome Everyone, Always be Learning, Work Hard Play Hard, Act Responsibly and Take Ownership. With “we” or “Exact”, we mean Exact Group B.V. including its subsidiaries.

The Supplier Code of Conduct applies to all suppliers of Exact who provide products or services and their employees, and subcontractors (collectively “Suppliers”, “you”). It contains universal standards and behaviours that we expect from our suppliers. In case of a violation of this Supplier Code of Conduct by the supplier, Exact may reconsider the relationship with the supplier, including termination thereof.

# Responsible business

## Making a difference

**Exact Exact is committed to making a difference, meeting our responsibility with respect to our environmental, social and governance initiatives.**

We do business with respect for each other, the environment and the communities we serve. We have an obligation towards our customers, ourselves and society as a whole to do good and to make a difference. We actively take care of our planet and engage with our local communities. We are committed to reduce our carbon footprint. We expect our Suppliers to share these values and instigate sound responsible business practices.

## Ethical business conduct

We expect our suppliers to ensure the highest level of business conduct, by adhering to universal human rights principles including, among others, non-discrimination and non-harassment, absence of forced labour, child protection (in their own organization as in their supply chain), but also financial integrity.

### Human rights

We respect human rights as defined by international guiding principles on business and human rights, and we recognise our responsibility to respect all internationally recognised human rights across our own activities and our business relationships.

Our commitment to respect human rights is in line with these principles and provides guidance to our suppliers on appropriate behaviour relating to labour and human rights issues:

- + We do not tolerate any form of discrimination or harassment.
- + We do not tolerate any form of forced labour, restrictions on workers' freedom of movement, withholding of wages or identity documents, physical or sexual violence, threats and

intimidation, or fraudulent debt from which workers cannot escape.

- + We do not tolerate the hiring of child labour under any circumstances.
- + We do not tolerate that employees of suppliers or their supply chain are required to work excessive hours during their working week, except in exceptional circumstances (and subject to appropriate remuneration), in accordance with local laws and regulations.

The Suppliers will pay applicable and fair legal wages under humane conditions for their employees or workers in the supply chain, including maintaining reasonable employee work hours in compliance with applicable law and international standards. Wages and benefits paid for a standard working week shall meet minimum wage standards. Suppliers agree to pay wages in a timely manner and use of temporary and outsourced labor should be compliant with all applicable laws and regulations.

As a supplier of Exact, you dedicate yourself to treating others with kindness and respect. Every employee in your organization has an equal opportunity for personal recognition and career development, regardless of personal preferences, background or beliefs. The same applies to the recruitment of new employees.

# Ethics & compliance policies

We strive to continuously improve our ability to identify potential or actual business integrity impacts. We expect our suppliers to remain vigilant of unusual and suspicious activities which may indicate unethical business practices such as mentioned above. Driven by our value 'Act Responsibly', we strive to be an ethical business, and we expect our suppliers to share these standards. In dealings with Exact, our suppliers must adhere to our ethical standards as described in this Supplier Code of Conduct.

This may mean that we may choose not to do business with certain suppliers or with suppliers located in countries where we deem the risk of non-compliance with our values and ethics high.

We are prudent and fair about how we select and engage our suppliers. All our suppliers are expected to comply with applicable laws and regulations, including in relation to the following subjects:



## **Anti-bribery and corruption**

Bribery can include the offering, promising or giving of payments or other advantages to any person to influence a business outcome, like obtaining or retaining business or services. Bribery and corruption can be direct, or indirect through third parties.



## **Privacy**

We attach great importance to privacy and the careful processing of personal data according to privacy legislation, from the moment of collecting personal data until the moment the processing ends. Exact expects the same from its suppliers.





### **Competition law**

Competition law prohibits conduct which harms competition and consumers. It ensures that business is conducted based on merit and open competition. Suppliers must act independently of their competitors. No commercially sensitive information should be exchanged with competitors, nor make agreements on any aspect of pricing in the market, commercial terms, strategy and market or customer allocation.



### **Conflicts of interest**

A conflict of interest can jeopardize your reputation and that of Exact. It occurs when personal interests compromise one's motivation to take business decisions or could be perceived by others to influence your motivation to take business decisions



### **Tax Compliance**

Suppliers must conduct their business in a way that ensures that the opportunity for, and occurrence of, tax evasion is prevented. We expect that our suppliers are tax compliant.



# Reporting

**Suppliers are responsible for their own compliance with this Supplier Code of Conduct. Exact may or may not actively monitor any such compliance.**

The Supplier agrees to respond transparently to any reasonable request for information that Exact, or professional advisors acting on our behalf, may require in relation to the level of compliance of the supplier with any part of this Supplier Code of Conduct, including requests enabling Exact to meet its statutory obligations.



## Contact

If you have any questions or need assistance understanding this Supplier Code of Conduct, please feel free to reach out to your contact person from Exact procurement or send an email to [Procurement@exact.com](mailto:Procurement@exact.com)

The current version of the Supplier Code of Conduct is available online:

<https://www.exact.com/about-us/responsible-business>.

Complaints and indications of misconduct can be submitted via [procurement@exact.com](mailto:procurement@exact.com) or anonymously via [www.exact.ethicspoint.com](http://www.exact.ethicspoint.com)



## Exact

Molengraaffsingel 33  
2629 JD Delft  
Nederland

Tel: 0800 – 66 54 631  
Email: [info@exactonline.nl](mailto:info@exactonline.nl)  
Website: [www.exact.com/nl](http://www.exact.com/nl)

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Exact develops cloud software for small and medium-sized companies and their accountants. The products automate business processes in areas such as Finance and HR and provide specific ERP solutions for wholesale distribution, manufacturing, business services and construction. This saves time and provides insight. It enables customers to work efficiently, make informed decisions and continue growing. More than 675,000 companies primarily in the Netherlands, Belgium and Germany already rely on Exact's software.

Exact was founded in 1984 in Delft, the Netherlands, which is still the location of our head office. Every day, more than 2,000 ambitious professionals work on innovation. Driving responsible business, with respect for each other, the environment and society is central to this. For more information, visit [www.exact.nl](http://www.exact.nl)

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