



## **OMP Code of Business Conduct and Ethics**

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### **OM PARTNERS NV**

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## LEADERSHIP MESSAGE

Dear OMPeople,

Over the years, OMP has become one of the leading solution providers in the supply chain planning industry. Our mission is to empower, motivate, and inspire supply chain professionals to outperform their goals, outsmart competition, and outclass themselves.

This OMP Code of Business Conduct and Ethics lays out our company values, which we expect you to embody in all your actions. This Code tells us how to behave towards our colleagues, customers, partners, and suppliers, as well as towards the public throughout our daily activities.

I expect all of you to read and understand this Code and apply it in your day-to-day activities, responsibilities, and behavior. We have put this Code in writing so that we can hold each other accountable and do the right thing.

Anita Van Looveren

CEO

## 1 INTRODUCTION

At OMP, we are committed to the highest standards of personal and professional behavior in everything we do.

In this Code of Business Conduct and Ethics (“Code”), we outline the responsibilities all OMPeople have to each other, our customers, partners, suppliers, and the public in general. It shows how our values inspire our greatest aspirations and shape our actions and behavior. It defines what it means to work at OMP, as well as our individual and collective responsibilities.

This Code is a document based on respect – for the law, for ethics and integrity, and for all our stakeholders, both internal and external.

This Code is intended for:

- All employees within the OMP group:
  - To display what is expected from us and impose the responsibility on each of us to apply OMP's values in everything we do,
- Executive Management, the Board of Directors, and our management teams:
  - To help them making correct decisions and be a role model in accordance with our responsibilities and core values,
- Prospective employees:
  - To give them more insight and understanding of our values, but also indicate what we expect from them when they join OMP,
- All other external business partners, suppliers, and stakeholders:
  - To give them more insight and understanding in the values of our organization.

Our objective is to make sure that this Code reflects the most up-to-date and helpful framework on ethical business conduct for our organization, as well as for OMPeople in their daily work.

This Code empowers you to practice the highest standards of business conduct and ethics. It is only through respecting and applying its principles that we will assure the integrity and ethical leadership of our organization.

## 2 OUR VALUES

OMP helps customers facing complex planning challenges to excel, grow, and thrive. What drives us is the desire to empower, motivate, and inspire supply chain professionals to outperform themselves. In everything we do, we put people first. We also encourage OMPeople to excel, grow, and thrive.

Our mission and values shape our everyday actions and direct our future. Our guiding values ('values') are people, passion, pride, promise, and partner. Five little words with a massive impact on everything we do and every action we take. They are translated into operating principles that show us the way to meaningful OMP behavior and contributions.



### PEOPLE

We put people first in everything we do. This includes our teams, our customers, and society at large.

- We **treat each other as equals**, appreciating talents, abilities and potential
- We embrace and **respect diversity** in age, gender, identity, sexual orientation, background, culture, character, skills, expertise and opinion
- We **actively connect** with colleagues, customers and other stakeholders because together we can achieve more
- We safeguard a **healthy balance** between professional and personal life
- We **learn, develop and adapt** at every stage of our career



### PASSION

Passion drives us forward. We believe in our mission, our solution, and our work.

- We **celebrate successes and share** them with others
- We **don't compete with each other** - we compete with the competition
- We **take responsibility and ownership** for our ideas, skills, knowledge and insights
- We constantly produce new knowledge and enrich our expertise. We are **thought leaders in our industry**
- We **share the passion for our work** with colleagues because it's a never-ending source of energy



### PRIDE

We're proud of what we do. Not only do we celebrate who we are, we look forward to a promising future.

- We maintain **high quality standards** in everything we say and do
- We **challenge ourselves and others** to be the best, learning from our mistakes
- We invest in research and **continuous improvement** in line with the latest technology and business trends
- We are **all ambassadors** showing our pride through our state-of-the-art deliverables
- We **compliment others** when they deserve it, so they feel proud of their accomplishments



### PROMISE

Our customers appreciate us for delivering what we promise. They know we go the extra mile.

- We seek to **turn innovative ideas into breakthrough solutions**
- We assure **open, timely and precise communication** on agreements, milestones, and risks, at every stage
- We **respect** agreed processes and procedures
- We **take full responsibility** for project scope, budget, resources, timing and quality
- We always aim for **high quality standards** in the work we do



### PARTNER

We aim to build long-term partnerships with all our stakeholders in which everyone wins.

- We **embrace teamwork** by believing that united (together) we can achieve more than alone
- We **support each other** in achieving individual, team and organizational objectives
- We listen carefully and are **open to dialogue** and constructive feedback
- We **prepare** for meetings, remain aware of our aims, scope and deliverables, **and respect decisions**
- We **share knowledge** by fully documenting our work to support continuity and enable personal development

## 3 OUR COMMITMENTS

By applying the principles of this Code, we demonstrate our respect for the world in which we operate. We are committed to our role in society and to meeting our obligations to the countries and communities in which we do business. In this way, we contribute directly to sustainable development.

### 3.1 Care for people

We care for people. OMP believes in giving back and creating a lasting impact with personal commitment that comes from the heart.

A deep commitment to social responsibility is core to who we are as a company. We believe people are at the heart of our business and we take pride in our outstanding work culture. We strive to be an optimal employer to our workforce as well as a valued partner to all our stakeholders (customers, partners, and suppliers) and the communities we deal with.

### 3.2 Respect and integrity

We depend on the relationships we have; we respect the countries and communities in which we operate, and we want them to benefit from our presence. It is only by demonstrating our respect for the law and ethical behavior that we can expect to continue to be seen as trusted partners and positive actors in communities worldwide.



We care about the consequences of our decisions, large and small, on those around us. This includes impact on human rights, health, safety, and the environment.

### 3.3 OMP leadership

We believe in close leadership. We believe that each leadership role has a crucial impact on the performance and the engagement of everyone at OMP.

Leadership in compliance with our values and this Code is key. It is the responsibility of our managers to ensure that their team members know and understand this Code and have access to the resources they need to adhere to our values.

### 3.4 High standards of personal and professional behavior

Making the world a better place is central to our culture, our people, and our product and service offerings. We aim to constantly improve our environmental, social, and governance performance (e.g., our ESG policy). This Code follows the internationally recognized best practices, like the UN Sustainable Development Goals, The United Nations Guiding Principles on Business and Human Rights, and The International Labor Organization (ILO) Fundamental Conventions.

We are committed to being fully compliant with the applicable employment and human rights laws and regulations, including the principles of Environmental, Social and Governance as a means to contributing to sustainable development as we conduct our business.

This Code reflects our commitment to this objective in three key areas:

- **Empowering our people** through proactive talent and career development and ensuring their well-being and respect for human rights,
- **Building for the future** with all our stakeholders through irreproachable business conduct, constructive engagement with them, and sustainable, innovative product management, and
- **Caring for our planet** through actions that address climate change and helping customers transform their planning system into an invaluable sustainability tool.

### 3.5 Compliance with laws and regulations

Compliance with the law is the foundation of ethical behavior. Since OMP operates globally, our behavior and that of OMPeople may be subject to many local laws and regulations, as well as supranational and international laws and regulations. By establishing the highest standards in this Code, we know that we are compliant with the most demanding of laws and regulations worldwide.

When operating in a country where local laws or common practices are not as strict as those set out in this Code and our company policies, we expect all OMPeople to act according to the highest standards as established in this Code. When the laws or regulations of some countries impose requirements or prohibitions that go beyond those contained in this Code, OMP and OMPeople will fully comply with such local requirements.

## 4 ETHICAL BUSINESS CONDUCT

### 4.1 Individual professional conduct

Acting ethically is not just about complying with the formal laws and regulations that govern our business. It is also about following the highest standards of quality and personal integrity, including dealing fairly with stakeholders and third parties. This helps us make informed and objective business decisions and avoid unintentional violations of laws and company policies.

#### 4.1.1 Responsibility and setting an example

Equally important to our legal compliance, is our individual professional behavior which shows respect towards each other and all our other stakeholders, including customers, partners, suppliers, and the communities where we work. The respect we show for our stakeholders will help maintain and enhance their trust and confidence in us.

Beyond that, we all can be leaders in ethics; we should all know, develop, and demonstrate leadership in our daily activities. We should lead by example with a clear sense of integrity, tolerance, openness, and frankness. There is no place for inappropriate behavior or any form of discrimination.

#### 4.1.2 Bribery and corruption

OMP is committed to fostering an open and honest culture of trust and integrity. We compete responsibly, ethically, fairly, and transparently as well as complying with all applicable anti-bribery, anti-corruption, anti-competition, anti-money laundering, trade-restriction (e.g., embargos and export control regulations), and other applicable laws and international standards for responsible business conduct.

OMP competes based on its innovative products and expertise and focuses on being close to its customers. We never bribe or improperly influence our commercial partners or any government officials. A government official can be an officer, employee, or representative of a government agency or an employee of a government owned or controlled business. We prohibit any facilitation payments to public or government officials.

Bribes and improper advantages can be monetary such as cash payments, but they may also include non-monetary items such as improper gifts, products, hospitality and meals, travel and accommodation, and other items or services that ultimately mean the transfer of value in return for special consideration. Legitimate business expenses must always be associated with a business purpose, appropriate as to time and place, of nominal value, infrequent, unsolicited, something other than cash or cash equivalents, documented properly, in compliance with policies applicable to giver and receiver as well as with applicable legal requirements, including local laws, so that the transaction does not create an impression of impropriety.

#### 4.1.3 Gifts and hospitality

OMP believes in sustainable collaboration with its partners, customers, and suppliers. Having a good working relationship with third parties is very important and, in the course of business, there may be an occasion to exchange gifts or hospitality. However, it is vital that any gift or hospitality offered, given, or received by OMP or OMPeople is legitimate, reasonable, and proportionate, and cannot be construed as a bribe or inducement.



Trusting on the good sense and responsible behavior of OMPeople, gifts or hospitality can be acceptable when 1) permissible under applicable laws and regulations and in line with internal OMP policies, 2) infrequently given to or received by the same recipient, 3) given or received openly with no reasonable appearance of improper purpose and without expecting or requesting anything in return, and 4) of a proportionate value in relation to the recipient's geographic location and standard of living.

Gifts and hospitality may not be given, received, or promised if they are cash or cash equivalent (e.g., a discount, gift cards, stocks, loan, per diems or services), related to the granting of any license, permit, or contract (or equivalent), or granted during tender or contractual negotiations.

#### **4.1.4 OMP's interests & avoiding conflict of interest**

OMPeople should behave as the owners of OMP, meaning that they are responsible for acting in the company's best interests. They should remain free of interests or relationships that are, or appear to be, conflicting, biased, or detrimental to the best interests and reputation of OMP. OMPeople will not use OMP's assets, property, or information for improper personal gain, nor otherwise compete with OMP.

#### **4.1.5 Proper use of OMP assets**

OMPeople are responsible for the proper use of OMP's assets and resources, and their protection through our respect for the OMP policies, guidelines, and procedures.

OMP's assets are intended for professional use for our work. Reasonable personal use of information, technology, and communication assets may be allowed, in line with the specific OMP policies and in respect of privacy. OMPeople shall protect OMP's assets and use them carefully and responsibly. They should always avoid improper use (e.g., transmitting or storing offensive messages or images).

Anyone who uses OMP's assets have a duty to protect them from any deterioration, alteration, fraud, loss, or theft, and must not bypass the security solutions on any equipment provided by OMP.

#### **4.1.6 Confidential information and intellectual property**

Confidential information is highly valuable property. It is the organization's asset and includes intellectual property such as patents, trademarks, trade secrets, and know-how. It also includes internal strategic, financial, technical, or commercially sensitive information related to its products and services, as well as information related to personal data and human resources. Confidential information also includes information about handling tools or systems and information entrusted to OMP on a confidential basis by third parties.

OMPeople are responsible for protecting confidential information and ensuring that it is used properly and shared only with authorized persons to prevent any accidental, unauthorized, or unprotected disclosure. OMPeople should treat confidential information in accordance with the applicable OMP IT security instructions and policies.

OMPeople should not only respect the privacy and the confidentiality of all OMP's data, but also of its customers, business partners, employees, consultants, or any other person. They should also respect the intellectual property of OMP, its customers, competitors, and third parties.

#### **4.1.7 Personal participation in politics**

OMP does not discourage participating on a personal basis in the political process. However, no one should claim that they represent the company in such personal activity.





#### **4.1.8 Personal use of social networking and third-party websites**

Personal participation online by OMPeople, including in personal social networks, should avoid any claim that they represent OMP in any way.

#### **4.1.9 Alcohol & drug abuse**

OMPeople have the obligation to attend the workplace fully alert and able to perform their job. This means never coming to work impaired and always using moderation and good judgment if alcohol is served at a company-related meal or event. The abuse of alcohol, drugs, or illegal substances is a serious breach of this obligation.

### **4.2 Respect for each individual**

Teamwork and respect hold us together as an organization. In corporate decision-making, we favor inclusion over authority, taking every person seriously and listening carefully to their voice. Inspired by respect, fairness, and integrity, we nurture every individual at the heart of OMP and are passionate about our customers because we owe it all to them. OMP believes in empowering people: respecting, encouraging, and valuing each individual.

#### **4.2.1 Human rights as a value**

OMP respects human rights, as set out in the Universal Declaration of Human Rights and the International Labor Organization's (ILO) Fundamental Conventions. We conduct our business in a manner that respects human rights and dignity of all people, including our employees, customers, partners, and suppliers, and the communities where we operate.

OMP recognizes its responsibility to respect human rights and avoid complicity in human rights abuses. We are fully engaged to take effective measures to end any discrimination in the workplace.

We aim to ensure that, by following our principles, our presence fosters sound relationships, encourages teamwork and collaboration, and avoids conflict wherever we do business.

#### **4.2.2 Diversity and inclusion**

OMP embraces and values diversity in all its forms, whether it be gender, age, ethnicity, or cultural background. Equal opportunity is essential to our recruitment process, as we aim to develop a community of diverse talent.

We believe that diversity and inclusion are the catalyst for success and innovation in the workplace. We believe that differing opinions and lived experiences are valuable and serve to support our business overall. We aim to embrace this diversity and create a culture of inclusion where all OMPeople are valued for their knowledge, skills, experiences, and culture.

We seek to maintain a positive workplace, free from discrimination and harassment. We encourage fair employment practices worldwide and champion pay equity and mutual respect, promoting an environment of fairness and equality.

#### **4.2.3 Talent and development**

Talent comes in many forms. At OMP, we embrace skills of all kinds. We believe there are many ways to create value, and each person's input is beneficial. We challenge OMPeople to excel in everything they do.



We believe that at OMP, a person applies for a career, not just a job, embarking on a journey and enjoying the ride.

We believe that the development of talent is key to maintaining an innovative, engaged, and motivated workforce. Our specific coaching and leadership programs are built to support everyone in their need to grow themselves, along with the company. To reveal the best of yourself we offer a broad range of technical and non-technical trainings and skill and competence development and talent programs.

#### **4.2.4 Well-being**

Taking care of each other is part of OMP's DNA. As such, we consider it evident to take extra care of the health and safety of OMPeople and each other. We are convinced that colleagues who are well-balanced are more creative, work together more productively, and produce better results in the end.

Working at OMP is more than just a paycheck. It is being part of the OMP community and feeling connected with OMPeople all over the world. OMP creates a fun and inspiring work environment that rewards innovation and collaboration at all levels while giving a sense of purpose and belonging.

OMP protects and promotes employee safety and health, both physical and mental, and complies with all applicable workplace safety and hygiene policies, laws, regulations, and standards to ensure that everyone feels safe at the workplace. We maintain an adequate and fair approach to remuneration.

We embrace the added value of all team members by honoring talent with meaningful and well-balanced tasks. These tasks are in line with individual ambitions, capabilities, and organizational goals. We support a hybrid way of working which encourages a healthy balance between professional and personal life for all employees. We provide coaching and career guidance for all our colleagues.

We rely on each other to step up, persevere, speak fearlessly, and achieve our goals together, especially when the going gets tough. We encourage and reward knowledge dissemination.

By cheering, sharing, and celebrating successes, we acknowledge the commitment, efforts, and results achieved by all our teams and their individual members.

#### **4.2.5 Mutual respect and prohibition of any form of harassment or discrimination**

OMP expects OMPeople to treat each other in a professional manner, based upon mutual respect, trust, and individual dignity.

There is a zero-tolerance policy against any discrimination whether based on race, ethnicity, gender, gender identity, sexual orientation, disability, age, marital status, or religious belief. OMP is committed to providing a work environment that is free of any form of harassment, including sexual harassment.

OMPeople should treat others as equals, and appreciate their capacities, contributions, and added value, with consideration for individual abilities and potential.

#### **4.2.6 Open to constructive feedback and dialogue**

OMP constantly strives to build fair, transparent, and constructive relationships with our employees, customers, partners, and suppliers. We respect the rights of all our stakeholders in all our operations, processes, procedures, and policies.

OMP also respects individual and collective freedom of expression in accordance with the applicable laws and regulations. We respect all constructive feedback and are open to dialogue.



## 4.3 Respect for others

Positive engagement between OMP and its external partners and stakeholders will enable us to build for the future together. This requires transparency, ethics, and integrity based on the most demanding and sensitive principles and practices.

### 4.3.1 Partnership

OMP chooses its customers and external partners carefully, teaming up for the long run. Adding value through carefully selected partnerships that help OMP make a difference.

We search for the right match, collaborating only with those partners who share our vision and values. We strike the right balance, complementing our expertise with that of our partners.

During customer/partner/supplier evaluations, OMP takes the appropriate steps to ensure ethical business practices, labor and human rights, supplier diversification and inclusion, environmental stewardship, management systems, and governance are considered. OMP also works to create partnerships with suppliers that share a commitment to sustainability.

### 4.3.2 Fair competition

OMP's commitment to fair and ethical competition means that we do not win business or seek to maintain any customer relationships by acting illegally or competing unfairly. We comply fully with laws and regulations on anti-trust and fair dealing with customers, suppliers, and competitors and respect their rights.

We are committed to competing based on the quality of OMP's products and services. No one may propose or accept any kind of agreement or understanding with any competitor that may restrict full and fair competition for the sale of products or services in any way.

Whenever OMP is involved in trade association activities or in other situations where there is communication among competitors, customers, or suppliers, we must be especially alert to antitrust limitations on these communications and joint activities.

## 4.4 Respect for our environment

The future of our planet and its people will determine our future as a company. OMP recognizes that the world faces environmental challenges and is committed to promoting a healthy environment. As an organization that engages in developing and implementing supply chain planning solutions worldwide, we believe that our business can add value and should act to promote a positive influence in matters that improve the world.

Supply and value chains are getting more complex every day. OMP's supply chain planning solutions help customers in their search for operational excellence. Our solutions allow to reduce waste in its many forms every day and optimize the use of scarce resources. We are committed to continuing to support and educate our customers and stakeholders and enabling the growth of sustainable companies, which we believe are vital to improving our environment.

With operations and projects across the globe, OMP understands the importance of respecting the environment. We aim to not only comply with applicable environmental laws and regulations, but to go beyond the minimum required to protect the planet through sound environmental stewardship.



Continuous improvement in environmental performance forms an integral part of our actions for sustainable development. OMP is committed to reducing its energy consumption, water usage, waste disposal, and carbon footprint in a practical and cost-effective manner. We will achieve this by promoting environmental sustainability initiatives with OMPeople, as well as working in partnership to achieve ongoing environmental and sustainable operational improvements.

## 5 RAISING CONCERNS

OMPeople should adhere to the rules of this Code. OMP does not tolerate behavior that is illegal, unethical, or in breach of human rights. A robust and effective code of conduct, one that is respected by all, requires actions that demonstrate that our standards are being upheld. So, while it can take courage to raise concerns about wrongdoing, reporting violations of this Code is essential to protect our organization, OMPeople and all our stakeholders' interests. Issues raised will be investigated and handled carefully, with respect for the rights of all involved individuals.

We have zero tolerance for retaliation. OMPeople may not suffer any adverse consequences for:

- Refusing to do something that violates this Code, our requirements, or the law, even if their refusal results in the loss of business for OMP,
- Raising a concern in good faith about potential misconduct, or
- Cooperating in an investigation.

Anyone who retaliates against OMPeople for engaging in any of these activities will be subject to disciplinary action, up to and including termination.

If you become aware of an actual or potential violation of this Code, you should report it promptly to your Team Manager, the Executive Team Management, or to a representative of the Legal or Human Resources team. No one will be penalized for having reported a good-faith belief concerning a possible violation of this Code even if, after investigation, no violation has been found.

All reports are treated confidentially. You also have the option to report anonymously via the [Whistleblowing form](#).

Reported violations that are serious enough to be a legitimate violation of this Code will be investigated by OMP in order to identify their cause and to implement appropriate remedial actions. If, after a fair investigation, including an opportunity to be heard, a violation of the Code has been determined, disciplinary action may be taken, including termination of employment, in accordance with local laws. OMP may take further legal action including criminal proceedings as specified under law.

## 6 CONTACT AND FEEDBACK

We welcome comments and suggestions for improving our Code. If you think something is missing or can be improved, please let us know at [hrglobal@omp.com](mailto:hrglobal@omp.com).