

STONE NV – Code of Conduct (2026 Revision)

Version: November 2025

Applies to: All STONE NV employees, subcontractors, suppliers, distributors, logistics partners, quarry operators, and any business partner in our value chain.

1. Purpose & Scope

STONE NV is committed to responsible sourcing, ethical business practices, safe and respectful workplaces, environmental stewardship, and transparent governance. This Code of Conduct applies globally to all business partners supplying products or services to STONE NV.

All partners must ensure that these standards apply across their own supply chains, including sub-suppliers, quarries, manufacturers, logistics partners, and subcontracted labour.

2. Organisational Governance

STONE NV operates under the 2025 organisational structure, reflecting the current leadership and operational responsibilities.

STONE NV 2026 Org Chart (Simplified)

- **CEO – Jeltsin Neckebroek**
Holds overall responsibility for governance, strategy, sourcing direction, and oversight of all company functions.
- **Director of Product & Marketing – Kristof T’Sjoen**
Responsible for material curation, brand positioning, product direction, and commercial responsibility for **Sales Belgium & Netherlands** across both **distribution** and **projects**.
- **Export Sales Director – Jurgen Nauwelaers**
Oversees all export markets, international business development, and large-scale project relationships outside Belgium and the Netherlands.
- **Finance Director – Alain Demets**
Responsible for financial reporting, budgeting, payment flows, financial integrity, and general administrative processes.

Board of Directors (2025)

- Jeltsin Neckebroek
 - Oscar Van Hool
 - Jef Stalmans
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3. Human Rights & Labour Standards

STONE NV requires all partners to uphold the highest standards of labour practice.

3.1 No Child Labour

- Minimum hiring age must follow ILO C138: **at least 15**, or higher in countries with stricter laws.
- No workers under 18 may perform hazardous work.

3.2 Prohibition of Forced Labour

- No involuntary or bonded labour.
- No retention of identity documents.

3.3 Fair & Transparent Employment Conditions

Partners must ensure: - Written and understandable employment contracts. - Freedom to terminate employment within legal frameworks. - No recruitment fees for workers.

3.4 Living Wage Commitment

STONE NV requires partners to: - Pay wages that meet **legal minimums** AND reflect **local living-wage benchmarks**. - Provide payslips, overtime policies, and transparent deductions.

3.5 Working Hours & Rest

- Maximum working hours and overtime must follow national laws or ILO standards.
- Workers must receive weekly rest days and paid leave where required.

3.6 Non-Discrimination

Hiring, promotion, and compensation must be free from discrimination based on gender, age, ethnicity, religion, sexual orientation, disability, marital status, or political affiliation.

3.7 Freedom of Association

Workers must be allowed to form or join unions, worker committees, or representative bodies.

4. Health, Safety & Working Conditions

All partners must maintain a safe and healthy working environment.

Requirements include: - Risk assessments for machinery, dust, silica exposure, heavy loads, chemicals. - Personal protective equipment (PPE) provided at no cost. - Emergency procedures and first-aid availability. - Safe housing when worker accommodation is provided.

STONE NV prioritizes safe working conditions in **quarries, stone processing factories, and transport/logistics hubs**, which carry sector-specific hazards.

5. Environmental Responsibility

Partners must: - Minimize air, water, and soil pollution. - Manage quarrying responsibly, preventing erosion and habitat destruction. - Comply with local environmental regulations. - Monitor and reduce CO₂ emissions where possible. - Implement responsible water use and recycling practices. - Avoid illegal extraction from protected areas.

STONE NV encourages: - Circular material flows (e.g., re-use of offcuts, recycled aggregates). - Transparent quarry-to-customer traceability. - Use of low-impact transport modes where available.

6. Ethical Business Practices & Anti-Corruption

STONE NV maintains zero tolerance for: - Bribery or facilitation payments - Kickbacks or informal commissions - Manipulation of invoices or customs documentation - Tax fraud or unlawful cash transactions

All partners must: - Maintain accurate financial records. - Ensure transparent pricing and contracts. - Allow STONE NV or third parties to perform financial integrity audits.

7. Supply Chain Traceability

Due to sector-specific risks, STONE NV requires: - Full disclosure of quarry origin for natural stone. - Batch-level traceability for ceramics, terrazzo, and engineered surfaces. - Documentation of subcontracted labour. - Transparency on logistics routes.

STONE NV reserves the right to require: - Quarry licenses - Operating permits - Ethical sourcing certificates - Customs documents

8. Implementation, Audits & Compliance

8.1 Mandatory Acceptance

All business partners must sign this Code of Conduct.

8.2 Audits

STONE NV or independent auditors may perform: - Announced audits - Unannounced audits - Worker interviews - Document reviews - Factory or quarry site inspections

8.3 Non-Compliance & Corrective Actions

Non-compliance triggers: 1. Written notice 2. Corrective action plan with timeline 3. Re-audit 4. Termination if improvement is insufficient or if violations are severe (e.g. child labour, forced labour, corruption)

STONE NV reserves the right to suspend deliveries immediately in high-risk situations.

9. Grievance & Reporting Channels

STONE NV encourages anyone—workers, communities, employees—to report concerns.

Internal Contact

relevant STONE NV contact (SCO)

Email: info@stone.be

Phone: +32 (0)9 388 91 11

****Reports may be submitted to STONE NV via the general contact channels. STONE NV will review all concerns in good faith and address them appropriately.**

10. Expectations for Sub-Suppliers

Partners must ensure that: - All standards in this Code apply fully to their subcontractors and suppliers. - The Code is communicated in local languages. - Sub-suppliers undergo risk screening. - No prohibited quarries or regions are used.
