

Supplier Code of Conduct

As entrepreneurs at Deceuninck, we are committed to build a sustainable home for our people and our customers. We strongly believe that this sustainability is only possible, if we all adhere to a set of principles, based on our core values, which will drive our behavior on a daily basis.

We expect everyone who works with Deceuninck to behave in accordance with the principles contained in this Supplier Code of Conduct.

DECEUNINCK'S SUSTAINABLE PRINCIPLES

Below are the basic principles that form the framework in which Deceuninck expects its Suppliers to operate:

- **You exercise honesty, loyalty, fairness, equity, proper courtesy, consideration, integrity, accountability and sensitivity in dealing with customers, suppliers and employees.**

You comply with the anti-bribery and anti-corruption laws, directives and regulations that govern operations in the countries in which you do business.

You refrain from offering or making any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on facilitating payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, even in locations where such activity may not violate local law. Personal safety payments are permitted where there is an imminent threat to health or safety.

You do not offer any illegal payments to, or receive any illegal payments from, any customer, supplier, their agents, representatives or others. The receipt, payment, and/or promise of sums of money or anything of value, directly or indirectly, intended to exert undue influence or improper advantage is prohibited.

You do not seek to gain any advantage of any kind by acting fraudulently, deceiving people or making false claims, or allow anyone else to do so. This includes defrauding or stealing from the company, a customer or any third party, and any kind of misappropriation of property.

The exchange of gifts or business courtesies cannot be used to gain an unfair competitive advantage. In any business relationship, you ensure that the offering or receipt of any gift or business courtesy is permitted by law and regulation, that these exchanges do not violate the rules and standards of the recipient's organization, and are consistent with reasonable marketplace customs and practices.

- **You keep your business records in a manner that accurately reflects the true nature of your business transactions.**
- **You comply with all applicable laws, rules, and regulations in all countries, and report suspected violations.**

You comply with applicable anti-trust or competition laws and regulations in all countries you operate in, including the prohibitions on fixing prices or margins with competitors or participating in a cartel.

You comply with import and export control laws of the United States and all other countries in which you operate, including restrictions on transactions with parties on the restricted parties list and with certain designated countries. You provide truthful and accurate information and obtain export licenses and/or consents where necessary. You develop, implement, and maintain effective methods and processes appropriate to your products to minimize the risk of introducing counterfeit parts and materials into deliverable products. In addition, you shall provide notification to recipients of counterfeit product(s) when warranted, and exclude them from the delivered product.



You do not allow yourself to be used or exploited as a vehicle for money laundering, funding criminal activities, or supporting illegal activities.

You do not use or share inside information, neither for your own financial gain nor for a third party's gain.

- **You will not knowingly assist any third party** to violate any law of any country, by creating false documents or by any other means.
- **You protect (personal) data** against unauthorized users.
- **You treat people with respect and dignity, encourage diversity, remain receptive to diverse opinions, promote equal opportunity for all, and foster an inclusive and ethical culture.**

You ensure that illegal child labour is not used in the performance of work. The term "child" refers to any person under the minimum legal age for employment where the work is performed provided the legal age is consistent with the minimum working ages defined by the International Labour Organisation (ILO).

You adhere to regulations prohibiting human trafficking, and comply with all applicable local laws in the country or countries in which you operate. You must refrain from violating the rights of others and address any adverse human rights impacts of your operations.

You ensure that your employees are afforded an employment environment that is free from physical, psychological, and verbal harassment, or other abusive conduct.

You provide equal employment opportunity to employees and applicants for employment without discrimination.

You pay workers at least the minimum compensation required by local law and provide all legally mandated benefits. In addition to payment for regular hours of work, workers must be paid for overtime at such premium rate as is legally required or, in those countries where such laws do not exist, at least equal to their regular hourly payment rate. Deduction from wages as a disciplinary measure should not be permitted.

You recognize and respect any rights of workers to exercise lawful rights of free association, including joining or not joining any association of their choosing.

You protect the health, safety, and the welfare of your employees, contractors, visitors and others who may be affected by your activities.

- **You avoid conflicts of interest.** Business decisions and actions on behalf of your company must never be influenced by personal considerations or personal relationships. You shall never use company property, information or your position to create personal or family benefit. A conflict of interest may occur when family members or close friends are involved in business relationships with you, either inside or outside Deceuninck.
- **You take responsibility to the environment.** You work to reduce and prevent waste, emissions and releases in all of your operations. You safely use, handle, transport and dispose of all raw materials, products and wastes. You strive for continuous improvement of your environmental performance. Finally, you comply with all applicable environmental laws and regulations.
- **You respect Intellectual Capital.** You protect confidential information obtained during your business relationship with Deceuninck. You respect the restrictions on the use and reproduction of Deceuninck's intellectual property. Intellectual property includes copyrights, trade secrets and trademarks, innovative ideas and process knowledge.

FOR ACCEPTANCE:

For and on behalf of:

NAME:

DATE: