

Helmond, January 2021

## Supplier Code of Conduct

Nedschroef is committed to high standards of business ethics and integrity, as reflected in Nedschroef's Code of Conduct (the "Code"). The Code is applicable to all Nedschroef affiliated companies and employees, and this Supplier Code of Conduct (hereinafter referred to as "Supplier Code") is a natural outgrowth of it and reflects Nedschroef's desire to extend its commitment to high standards of business ethics and integrity to its Suppliers and their affiliates, officers, directors, agents, employees, representatives, subcontractors, and consultants (the "Supplier"). The Supplier Code is therefore made available to our Suppliers with the goal of strengthening our mutual understanding of how sustainable business should be practiced on a day-to-day basis.

This Supplier Code describes our requirements which we expect from our suppliers to adhere to and which should be our common daily working practice.

### A. HUMAN RIGHTS

In accordance with the aforementioned statements, Nedschroef requests the following business practices from Suppliers at all times, without exceptions:

- to respect the personal dignity, privacy and rights of each individual;
- to refuse to employ or make anyone work against his or her will;
- to prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative behavior.
- full acceptance of Universal Declaration of Human Rights.

### B. FAIR LABOR CONDITIONS AND CHILD LABOR

The Supplier will ensure fair labor conditions. In particular, it will:

- ensure that its employees work in an environment free of discrimination, harassment, intimidation or coercion relating directly or indirectly to age, gender, race, color of skin, nationality, social or ethnic origin, language, sexual orientation, marital status, religion, state of health or disability; hiring policy to be based on professional indicators only.
- comply with all applicable laws on preventing employment discrimination;
- respect the rights of employees to freely associate and bargain collectively;

- not use any forced or compulsory labor or involuntary prison labor, give all employees the choice to leave their employment freely upon reasonable notice, and adhere to the obligations of the UK Modern Slavery Act 2015;
- compensate employees fairly and refrain from offering excessively low wages (“wage dumping”).

The Supplier will not tolerate or use child labor in any stage of its general activities other than in accordance with all applicable laws and regulations; with regard to minimum employment age, Supplier will follow the principles of the UN Global Compact and the conventions of the International Labour Organization (ILO) Declaration.

### **C. OCCUPATIONAL HEALTH AND SAFETY**

The Supplier will provide a safe and healthy workplace for all of its employees so that all can work without any known risk to their health.

- It will commit and follow WHO’s advises and protocols.
- Suppliers will ensure a clear fire-protection protocol
- Safety-commitment with level 2 as minimum
- Level 3 latest implemented per 2025.

### **D. ENVIRONMENTAL RESPONSIBILITY**

The Supplier is committed to environmental protection and will conduct its business in an environmentally sensitive way.

- It will fully accept the Paris-Treaty.
- Will actively engage to reach these Paris-Treaty goals.
- Respect nature with a clear commitment to reach a neutral footprint.

#### **D1 Hazardous Substance Management and Restrictions**

The Supplier shall comply with all applicable laws and regulations prohibiting or restricting the use or handling of specific substances To ensure safe handling, movement, storage, recycling, reuse and disposal, the Supplier shall identify and manage substances that pose a hazard if released to the environment and comply with applicable laws and regulations for labeling, storing, transporting respectively recycling and disposal.

Suppliers will adhere to international regulations including:

- All obligations related to the Conflicting Minerals Rule and Regulation
- Registration, Evaluation, Authorization and Restriction of Chemicals (REACH) as published by the EEC December 30, 2006.

## **D2 Waste Management**

The Supplier shall manage and dispose of non-hazardous waste generated from operations as required by applicable laws and regulations. The Supplier shall minimize environmental pollution and make continuous improvements in environmental protection.

Focus must be on reducing waste in all its form to the absolute minimum.

## **E. BUSINESS ETHICS**

### **E1 Honesty and good Faith**

In all commercial transactions with Nedschroef, as well as with their own Suppliers, subcontractors and employees, our Suppliers are expected to act in an honest and good faith manner, across all aspects of their operations, both internally and externally. The Supplier will conduct its business in an ethical manner in accordance with all applicable laws, rules, and regulations. In particular, the Supplier will:

- refrain from any and all forms of extortion and bribery;
- adhere to anti-trust and other competition laws, e.g., not participating in price fixing or bid-rigging; and
- disclose to Nedschroef available information about conflict of interest, including disclosure of any financial interest of a Nedschroef employee in any aspect of the Supplier's business.
- refrain from any activity which could or would lead to money-laundering activity.

### **E2 Gifts**

All illegal benefits to third parties directly or indirectly are forbidden and will also never be accepted.

Facilitation payments are forbidden as well as the offer or acceptance of a gift in cash or cash-equivalent; gifts representing a value above € 25,- are prohibited as well. Contracts will be established on clear and measurable conditions and should never be based on gifts in any form nor on coercion/threats.

We expect our Suppliers to work according all international anti-bribery and anti-corruption standards.

### **E3 Confidentiality**

The Supplier and its Suppliers and sub-contractors will protect all confidential information provided by Nedschroef and its respective business partners.

## **F. BUSINESS CONTINUITY PLANNING**

The Supplier shall implement and maintain policies to mitigate the risk of business disruptions by exposures to risks including, but not limited to, terrorism, crime, software viruses, cyber-attacks, business threats, labor disputes and strikes, disease, pandemics, natural disasters and major accidents.

## **G. COMPLIANCE WITH APPLICABLE LAWS, RULES & REGULATIONS**

Acceptance to local laws and regulations both at the location of the supplier as well as the location(s) of the Nedschroef entities business is conducted with.

## **H. GOVERNMENT, MEDIA AND INVESTORS RELATIONS**

The Supplier shall not instigate any form of publicity or make any statement or submission to investors, the media or government referring to Nedschroef, without first obtaining prior written permission from Nedschroef (except where required by Government or under the law). The Supplier must submit any such request to Nedschroef.

## **I. SUPPLIER CONFIRMATION**

By doing business with Nedschroef, supplier confirm and agrees to comply with its terms of this Code-of-Conduct; any deviation must be reported immediately to Nedschroef.

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