

CODE OF CONDUCT FOR SUPPLIERS (and business partners)

1. Introduction

The Onkenhout group is committed to the fundamental values of integrity, honesty and transparency. Core values for our employees are teamwork, having fun and taking responsibly. We treat our stakeholders with respect and are aware of the importance to protect the environment.

Our business is based on long-term relationships with suppliers that belong to the world market leaders. This code of conduct is designed to outline the Onkenhout Group standards and is intended to be a guide for our suppliers and business partners on what we expect from them. Operating in accordance with the law, respecting the principles of human and labor rights and taking care of the environment are crucial values for us. The Onkenhout group consists of the following subsidiaries:

- Onkenhout & Onkenhout BV
- Beluma NV/SA
- Heyman Manufacturing GmbH
- Heyman Manufacturing S.r.o.

2. General principles

Legal compliance

Suppliers shall act in accordance with the Laws and Regulations of the applicable jurisdiction(s), with reliability and credibility, irrespective of national and cultural diversity.

Fair competition and anti-trust

Our suppliers must respect the rules governing free and fair competition and shall act in accordance with applicable anti-trust and competition rules and regulations.

Our suppliers shall deal fairly with all individuals and entities with whom they interact and shall not take advantage of anyone through manipulation, concealment, abuse of privileged information or any other unfair dealing or practice.

Our suppliers shall not engage in collusive binding, price fixing, price discrimination or other unfair trade practices, that are in violation with antitrust or other laws regulation competition.

Confidentiality

Our suppliers shall not disclose confidential and business sensitive information that they have obtained in the relationship with the Onkenhout Group. They have to ensure that measures have been taken to protect and prevent access to such information by unauthorized persons.

Our suppliers shall respect the intellectual property of Onkenhout, including patents, trademarks and copyrights and comply with all requirements and terms of their use.

Conflicts of Interest, Gifts, Unlawful benefits – Money laundering

Our suppliers will not accept illegal payments, gifts, unlawful benefits or bribery. The Onkenhout group maintains a zero-tolerance policy to bribery. Bribes may include money, gifts, travel/vacation expenses or any indirect benefit or consideration.

Suppliers shall comply with applicable regulations governing the prevention of money laundering, and not participate in any money laundering activities.

3. Principles of Human rights and social justice

- Suppliers must treat their employees equal and with respect, regardless of origin, sex, age, belief of disability.
- Suppliers should respect personal dignity, privacy and rights of employees.
- Suppliers should act against threat, abuse or exploitation of people.

- Suppliers should respect applicable national laws regarding safety, minimum wage and maximum number of working hours and provide fair working conditions and remuneration.

Forced labor – Child labor

- Supplier will not engage in or support forced, bonded or compulsory labor, nor shall the supplier require any form of deposit or confiscate identification papers from employees.
- Supplier shall ensure that no employee is younger than the legally fixed age for employment.
- Supplier should abide by the United Nations Convention of the Rights of the Child (1989) and comply with all relevant national and international laws, regulations and provisions applicable in their country of production or operations.

The Onkenhout group respects the children's right to development and education. Suppliers must not engage in any form of child labor.

Freedom of association

Suppliers must respect the right of employees to join any organized association of their own choosing and to bargain collectively as permitted by local laws and regulations. Suppliers shall respect the recognized unions. The supplier should also equally respect an employee's right to refrain from joining a union.

4. Health and Safety

Suppliers shall safeguard a healthy and safe working environment for all employees, in accordance with international standards and national legislation.

A supplier must establish organizational structures and procedures for the effective management of health, safety and environmental risks. Appropriate information and training on health and safety should be offered to the employees.

5. Environment

A supplier should take preventive measures in relation to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies. Actions should be based on national and international laws, regulations and standards in respect to the environment. Supplier shall minimize its environmental impact and continuously improve its environmental performance.

6. Material compliance & Conflict minerals

Suppliers shall take effort to know the origin of their raw materials and avoid the use of minerals mined in conflict areas. They should provide us with correct documentation regarding the products supplied to us such as country of origin, quality of the materials, certificates and product specification sheets. Therefore, suppliers shall ensure that the goods provided to the Onkenhout group are in compliance with requirements covered under the scope of all relevant environmental regulations. Suppliers shall perform sufficient efforts to avoid substances of very high concern (SVHC).

The Candidate List of Substances of Very High Concern (SVHC) is related to the REACH directive EC 1907/2006 and is regularly updated.

Supplier warrants that all the products and components provided to the Onkenhout group do not directly or indirectly contain Conflict Minerals, as defined by the United States Dodd Frank Act, Section 1502. Onkenhout requires manufacturing companies to identify and disclose the source of 3TG minerals (tin, tantalum, tungsten and gold) used in products supplied to Onkenhout upon request.

The Onkenhout group expects from its suppliers to provide us in writing and as early as possible and before delivery of the products with valid documentation about:

- Any permit requirements (for example Dual Use) applicable to products that are being delivered and result from the applicable Dutch, European (EU) American (USA) and Asia export, tariffs and trade laws.
- The Country of Origin of the products they supply to Onkenhout based on applicable export, tariff and trade laws.

7. Monitoring and review

Upon request a supplier shall provide information that demonstrate compliance with the code of conduct, even a visit to the relevant site for physical inspection should be allowed. A breach of any of the provisions in this code of conduct will be qualified as an ethics and compliance incident.