

## SUPPLIER CODE OF CONDUCT [V12.2025]

Date: 15.12.2025

Approved by the Management of Buyse Metal Works Group

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The Buyse Metal Works Group (BMWG), consisting of Buyse Decolletage NV and Desart Industries NV, is committed to sustainability in its business activities and aims to apply high ethical standards. Our suppliers (suppliers, service providers and contract manufacturers) play an important role as enablers of our sustainable growth and overall success.

The application of this Supplier Code of Conduct is based on a risk-based and proportionate approach, taking into account the nature, size, and activities of the supplier. We require our suppliers to explicitly acknowledge and adhere to the principles embodied in this Supplier Code of Conduct and to assure that their own suppliers will also comply with these principles.

The provisions of this Code are derived from and respect internationally recognized standards including:

- 🕒 OECD Guidelines for Multinational Enterprises
- 🕒 UN Guiding Principles on Business and Human Rights
- 🕒 ILO Declaration on Fundamental Principles and Rights at Work
- 🕒 ILO Fundamental Conventions
- 🕒 UN Universal Declaration of Human Rights

The Supplier Code of Conduct covers 3 sections:

- 🕒 Labour
- 🕒 Environmental responsibility
- 🕒 Business ethics
- 🕒 Compliance and monitoring

### LABOUR

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The BMWG complies with the fundamental labour and human rights as laid down in the conventions of the International Labour Organization (ILO) and the Universal Declaration of Human Rights. Suppliers and business partners shall strictly adhere to these same principles within their own operations and throughout their entire supply chain. Compliance with the standards set forth below is a mandatory condition of doing business with BMWG. In cases of non-compliance, the BMWG reserves the right to require immediate corrective actions or terminate the collaboration.

**Child labor** - No Suppliers may employ child labor. The term “child” refers to a person who is younger than 15 years old or who has not yet reached the age for completing compulsory education, whichever is greater (ref. ILO Convention n. 138). Child labour is not acceptable.

**Freely chosen employment** - We expect that our suppliers and their supply chains will not tolerate the use of any forced labour. Employment must be voluntarily and freely chosen. All Suppliers, including recruitment agencies used by a Supplier, must verify the legal employment eligibility of all persons to work and not use any form of prison, indentured, forced, involuntary, bonded or slave labor. Involuntary labor includes the transportation, harboring, recruitment, transfer, receipt, or employment of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

No Suppliers will require employees to lodge deposits or identity papers, or to pay recruitment fees. (ref. ILO Conventions n. 29 and n. 105)

**Wages and Hours** - Suppliers must ensure that all of their workers receive at least the legally mandated minimum wages and benefits. Working conditions, working time and compensation must be fair, complying with the laws, standards and practices applicable in those countries where the Supplier operates. Suppliers must maintain required official documentation that verifies an employee's age, wages, and hours worked.

**Humane and safe Working Conditions** - In alignment with the aforementioned international standards, Supplier shall provide a safe, healthy, and dignified work environment that is free from any inhumane or unsafe conditions. Supplier ensures that the workplace, or any other location where work is undertaken, is in full compliance with all applicable laws and regulations. At a minimum, this includes ensuring reasonable access to potable water and sanitary facilities, rigorous fire safety standards, and adequate lighting and ventilation. Supplier must implement appropriate controls, safe procedures, and protocols for providing necessary protective equipment. Suppliers are expected to track and document occupational health and safety incidents. Furthermore, Supplier shall take all appropriate measures to protect its employees from health hazards and ensures that all personnel are carefully selected and properly trained to perform their duties in a safe and dignified manner.

**Non-discrimination** - All Suppliers must treat their workers in a fair and non-discriminatory manner, with the guarantee of equal opportunity and the absence of any policy aimed at, or indirectly resulting in, discrimination toward them on any basis whatsoever, including, but not limited to, race, gender, sexual orientation, social and personal position, health condition, disability, age, nationality, religion or personal belief (in accordance with applicable laws). (ref. ILO Convention n. 111)

**Freedom of Association** - All Suppliers shall freely allow workers to join associations, and bargain collectively, in accordance with local law, without interference, discrimination, retaliation, or harassment. (ref. ILO Conventions n. 87 and n. 98)

## **ENVIRONMENTAL RESPONSIBILITY**

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**Environmental Commitment & Compliance** – Suppliers shall operate in an environmentally responsible and efficient manner, ensuring they minimize adverse impacts on the environment while maintaining full adherence to all applicable environmental regulations. We expect our Suppliers to avoid pollution and prevent the wasteful use of natural resources. In addition, Suppliers must respect and support the UN Global Compact's environment principles (principles 7, 8, and 9) by promoting greater environmental responsibility and encouraging the development of environmentally friendly technologies.

**Sustainable Materials & Conflict Minerals** – Suppliers must refrain from using materials that are considered harmful to the environment and are encouraged to adopt processes that support sustainability throughout their supply chain. Regarding mineral sourcing, Suppliers shall comply with all applicable conflict minerals laws and regulations. Suppliers shall establish a policy and provide appropriate information, where relevant, to reasonably assure that conflict materials (including tin, tungsten, tantalum and gold) do not directly or indirectly finance or benefit armed groups that are perpetrators of serious human rights abuses.

**Waste Management & Pollution Prevention** – Suppliers are expected to prioritize the minimization of waste generation, the proper disposal of hazardous materials, and the reduction of atmospheric emissions. Any waste, wastewater, or emissions with the potential to adversely impact human or environmental health shall be appropriately managed, controlled, and treated prior to release into the environment. Suppliers are expected to monitor and, where possible, reduce their environmental footprint, including energy consumption and greenhouse gas emissions.

## BUSINESS ETHICS

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The highest standard of integrity is expected in all of our business dealings:

**Compliance with legislation** – We expect all of our suppliers to comply with all applicable national and international laws, rules and regulations in the countries where they operate. This includes, but is not limited to the laws and regulations governing the following: environment, human rights and employment. In case applicable law requirements are lower than the requirements as set forth in this Code, the BMWG expects the Supplier to comply with the higher standards.

**Anti-Corruption and anti-bribery** - The Supplier shall not engage in or tolerate any form of corruption, extortion, embezzlement or bribery and shall comply with all applicable anticorruption and anti-bribery regulations, also including the UN Global Compact's principle 10 (Anti-corruption). Supplier will not offer or accept any benefits or other unlawful incentives to obtain any undue or improper advantage.

**Fair Competition** - All Suppliers will conduct their business in line with fair competition principles and in accordance with applicable antitrust and competition laws.

**Anti-Money-Laundering** - Supplier shall conduct its business in accordance with all applicable anti-money-laundering regulations.

**Accurate Record-Keeping** - Suppliers must maintaining accurate and transparent records in accordance with local GAAP. This include accurate and complete registration of invoices and other transaction documentation. The supplier will not assist or engage in any action or inaction that could reasonably be expected to result in the Company's books and records not being accurate and complete in all respects.

**Confidential Information** - Suppliers must safeguard and make only appropriate use of confidential information and intellectual property rights. Supplier must ensure that all personal data of employees, contractors and/or other third parties is processed in compliance with all applicable laws, including the General Data Protection Regulation (EU 2016/679).

## COMPLIANCE AND MONITORING

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Suppliers shall adopt or establish a management system with a scope that is related to the content of this Code. The management system shall be designed to ensure: (a) compliance with applicable laws, regulations and customer requirements related to the participant's operations and products; (b) conformance with this Code; and (c) identification and mitigation of operational risks related to this Code. It should also facilitate continual improvement. Suppliers should be open to proportionate audits, assessments or information requests, where relevant, to verify compliance with this Code of Conduct. The BMWG a) may require that any Supplier that materially infringes on the basic principles of the Code of Conduct, implement an acceptable action plan to bring its performance into compliance, and b) reserves the right to terminate its business relationship with any Supplier that is unwilling or unable to bring its performance into compliance.

**CONFIRMATION OF ADOPTION OF THE SUPPLIER CODE OF CONDUCT**

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The undersigned confirm to have received the Supplier BMWG Code of Conduct and commit to comply with it.

(Company and name)

(Title)

(Date)

(Signature)