

BEFESA

Supplier Code of Conduct



Introduction

Befesa promotes and expects business integrity, compliance with applicable laws and adherence to internationally recognized environmental, social and corporate governance standards within our own organization and among our business partners.

This supplier's code of conduct ("**Supplier Code of Conduct**") is a result of such a commitment and supplements our Code of Conduct, which includes our corporate values and principles. It applies to all suppliers, business partners, consultants, agents and other providers of goods and services to Befesa ("**Suppliers**").

Suppliers must operate in full compliance with all applicable laws and regulations of the countries in which they operate. All legally required permits, approvals, licenses and registrations shall be in place, up to date and available upon request. Should local laws and regulations be less restrictive, the principles of this Supplier Code of Conduct shall apply. In the case of a requirement being covered by this Supplier Code of Conduct as well as by applicable law, the stricter regulation offering the greatest protection shall apply.

Befesa expects its Suppliers to implement the principles set out in this Supplier Code of Conduct throughout their organizations worldwide and to comply with these. Befesa also expects Suppliers to use their best efforts to implement these standards with their suppliers and subcontractors and to take these principles into account when selecting them.

We have a whistleblowing channel available for reporting violations of this Supplier Code of Conduct. Please check our corporate website www.befesa.com.

This Supplier Code of Conduct shall remain valid until a new update is approved or it is repealed. It shall be reviewed periodically and is available on our corporate website www.befesa.com.

Environmental Protection and Energy Efficiency

One of the core principles of Befesa is the protection of the environment. We expect our Suppliers to comply with all environmental laws & regulations and to establish and maintain an environmental management system compliant with applicable international standards.

The handling of natural resources in a conservative way, sustainable business management and environmental protection are principles that our Suppliers shall be committed to.

Human Rights, Employment Practises & Health & Safety

Respect for human rights is a fundamental part of how Befesa does business. Our commitment to respecting human rights acknowledges all internationally recognised human rights, including without limitation, The United Nations Universal Declaration of Human Rights and the International Labour Organisation (ILO)'s Declaration on Fundamental Rights and Principles at Work, both of which provide a complete list of rights, values and fundamentals that must be fulfilled by our Suppliers.

We expect our Suppliers to share this commitment and specifically meet the following:

Child Labour

Suppliers must guarantee the non-existence of child labour and must comply with all applicable laws and regulations on the prohibition of child labour. 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 ILO.

Forced Labour

Any form of forced or compulsory labour, including modern slavery and human trafficking, must not be tolerated.

Non-discrimination

Befesa expects Suppliers to promote equal opportunities and equal treatment. Suppliers shall encourage diversity and must oppose all forms of discrimination in the workplace based on gender, age, religion, race, colour, nationality, social origin, ideology, disability, sexual orientation or any other condition protected by applicable law which might give rise to discrimination.

Harassment

Suppliers must treat employees with respect and dignity and shall ensure a work environment that is free from physical, psychological, sexual and verbal harassment, or other manners of coercion or abusive conduct.

Wages and Working Hours

Befesa expects Suppliers to (i) set working hours, wages and overtime pay in accordance with applicable local laws, including collective agreements to which the Supplier is subject and (ii) to pay all employees at least the minimum compensation required by local law and provide all legally mandated benefits.

Freedom of association

Suppliers shall respect the freedom of association and the right of workers to freely choose their own representatives and to negotiate collectively as well as respect the right of workers to refrain from such activities.

Health & Safety

Suppliers must be committed to provide a safe and healthy working environment and to promote and preserve the health of their employees. Suppliers are expected to establish and maintain an appropriate occupational health and safety management system.

Putting the safety of people first is a core value which our Suppliers shall promote. Suppliers must conduct their operations in a manner which protects the health and safety of every person that performs his or her respective activity. Moreover, we expect our Suppliers to implement the best possible accident prevention measures to ensure that the work environment conforms to the requirements of health-oriented design and to ensure that their employees are sufficiently trained in safety related issues.

Business Integrity & Corporate Governance Standards

Anti-Corruption & Anti-Bribery

Befesa does not tolerate any form of corruption and bribery.

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

Suppliers do not tolerate any form of corruption or economic crime by their own employees or employees in the supply chain.

Suppliers are expected to exert reasonable due diligence to prevent and detect corruption and bribery in all business arrangements, including cooperation agreements, joint ventures, and the hiring of intermediaries such as agents or consultants.

Money Laundering and Financing of Terrorism

Suppliers must guarantee that they conduct their business in a lawful manner and that their funds are derived from legitimate sources.

We expect our Suppliers to take suitable measures within their organisation to prevent money laundering and the financing of terrorism.

Conflict of Interest

Every Supplier must make business related decisions based on objective criteria only and not based on private relationships or interests and avoid conflict of interest that may lead to corruption risks.

Competition and Anti-Trust

Suppliers must be committed to conduct their activities in line with the principles of fair competition. This includes strict adherence to the anti-trust laws and regulations which strive to protect competition against any distortion or misrepresentation.

Suppliers must not fix prices or rig bids with their competitors. They must not exchange current, recent or future pricing information

with competitors. Participating in a cartel is absolutely prohibited.

Invitations and Gifts

Suppliers are expected to compete on the merits of their products and services. The exchange of business courtesy shall not be used to gain an unfair competition advantage. The offer or reception of invitations and gifts are only acceptable when they are allowed by applicable laws and regulations, or when these are appropriate and consistent with reasonable marketplace customs and practices.

Trade Compliance

Suppliers must ensure compliance with all applicable laws, directives and regulations governing the import and export of goods, services, components and information and must comply with all applicable embargoes and sanctions. Suppliers shall provide truthful and accurate information and obtain export licenses and/or consents where necessary.

We expect our Suppliers to adhere to all applicable conflict minerals laws and regulations. Suppliers shall take reasonable steps to track the source of minerals used in their products and shall provide the source and a description of the tracking process to Befesa upon request.

Insider Trading

Suppliers and their directors, officers and employees must not use any non-publicly disclosed information obtained in the course of their business relationship with Befesa as the bases for trading or for enabling others to trade in the stock or security of any company.

Personal Data

Suppliers must comply with all applicable laws for the protection of personal data, particularly of employees, business partners and customers.

Confidential/Proprietary Information

Suppliers shall properly handle sensitive information, including confidential, proprietary information and business secrets. Information should not be used for any purpose other than the business purpose for which it was provided, unless there is a prior authorization from the owner of the information.

Intellectual Property

Suppliers must comply with all applicable laws governing intellectual property rights, including protection against disclosure, patents, copyrights and trademarks.

Information Security

Suppliers must protect the confidential and proprietary information of others, including personal information, from unauthorised access, destruction, use, modification and disclosure, through appropriate physical and electronic security procedures.

Compliance with the Befesa Supplier Code of Conduct

Our Suppliers must ensure compliance with the principles established in this Supplier Code of Conduct and shall not tolerate any retaliation against persons who report violations of the principles set out in our Supplier Code of Conduct.

Befesa will monitor and ensure the continued application of these principles by our Suppliers and may request audits or

assessments to verify the degree of compliance.

Befesa reserves the right for adequate sanctions against Suppliers for failure to comply with any of the principles set out in this Supplier Code of Conduct. This may even lead to an immediate termination of the business relationship and the assertion of claims for damages and other rights in case of serious violations (e.g. in case of crimes committed) or failure to remedy any violation and implement adequate corrective measures within a reasonable time or displaying patterns of continuous non-compliance with these principles.

Supplier’s Compliance Declaration

By signing below, we acknowledge having received and taken due note of Befesa’s Supplier Code of Conduct and commit to fully complying with its principles and requirements. We also confirm that we have noted that compliance with this Supplier Code of Conduct is an essential prerequisite for business relations between Befesa and us as Supplier for Befesa.

Supplier’s Name: _____

Name of Signatory: _____

Place and Date: _____

Signature: _____