

BERDAL
CODE OF
CONDUCT

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CORPORATE SOCIAL RESPONSIBILITY FOR BERDAL

SUSTAINABILITY IS DOING!

Berdal has been working on more sustainable business operations since the 1990s. We believe that themes such as sustainability and circular construction require innovation. This means more cooperation throughout the entire chain. Based on the themes of sustainable business, climate, logistics, people and raw materials, we show which concrete actions we take when it comes to sustainable and socially responsible business.

SUSTAINABLE TOGETHER

We believe that every product at the end of its life is a raw material for a new product, without compromising on quality. Together with our suppliers and distributors, future-oriented machinery, rich knowledge and experience, we strive for a high-quality range of rubber and plastic products and concepts that consist entirely of renewable raw materials. The sustainability of our products is guaranteed by independent quality marks such as Der Blaue Engel and Cradle 2 Cradle.

ENVIRONMENTAL IMPACT

To take steps towards a circular economy, we opt for fully recycled materials such as raw materials and packaging materials where possible. With this we want to reduce waste flows and promote the reuse of waste. With every investment and policy choice, we include the environmental impact of our production and processes in final decisions. For example, in 2018 we opted for a new brand of injection molding machines that use 20-25% less energy and thus significantly reduce CO₂ emissions. Internal transport is only electric and the energy required for this is purchased as green as possible.

LESS PACKAGING MATERIALS

With regard to deliveries and products, we continuously look at optimizing packaging and reducing packaging plastics. In 2020 we invested in a new packaging line that packs pallets with 25% less packaging material. For example, in 2021 we have saved more than 22,000 kilos of packaging material for packaging our buckets, mortar tubs and bins. That same year we invested in a special banding machine so that our EPDM rolls no longer need to be wrapped in plastic. The reduction of printed matter and the far-reaching digitization of our communication limit the consumption of paper & cardboard.

Berdal purchases a significant part of its raw materials and semi-finished products for its own brands Gripline, Pandser, Premiumfol and Konvox in Europe and a smaller part in Asia. As a producer and brand owner, it is our goal that our products are produced in line with ethical, social and environmental standards that ensure fair and responsible business practices. This Code of Conduct outlines the (minimum) conditions that we want to comply with in our chain and describes the principles and values that apply to Berdal. All described principles apply to the Berdal "House of Brands" consisting of the Gripline, Pandser, Premiumfol and Konvox brands.

CORPORATE SOCIAL RESPONSIBILITY FOR BERDAL

CODE OF COMPLIANCE

This Code of Conduct deals with the (minimum) standards for our business agreements with our suppliers, and describes the principles and values that Berdal wants to adhere to. We expect our suppliers to be compliant with the standards described, to the extent that this can be considered reasonable within their sphere of influence, measured by best effort and influence on the theme. This applies to all production facilities, sub-suppliers, subcontractors and third parties involved. We expect both direct and indirect suppliers to respect this code. In addition, the supplier who has a direct relationship with Berdal will be responsible and liable for compliance. This requires a cooperative approach in which the supplier involves its business partners and takes reasonable and appropriate measures necessary to implement the requested standards where possible.

In all cases where (self) assessments, formal audits or factory visits take place, the supplier will be responsible for maintaining documentation to demonstrate compliance at the request of Berdal. Berdal will support suppliers in supply chain management where possible, by conducting risk assessments and monitoring social compliance in the supply chain.

LEGISLATION

The supplier shall ensure that its business practices comply with all national laws and regulations as applicable at the relevant location. This Code of Conduct has been drawn up in line with the UN Guiding Principles, the OECD guidelines for responsible business conduct and the ILO conventions.

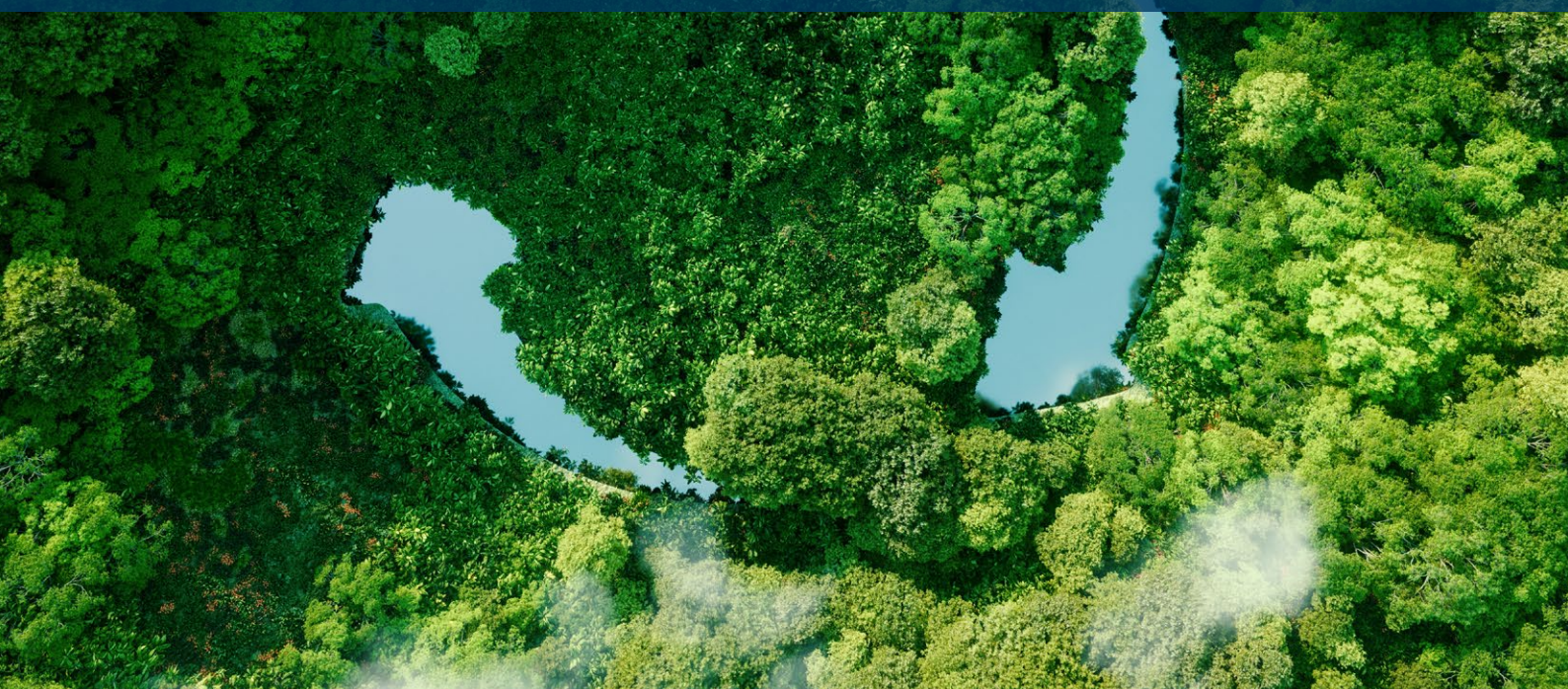
Berdal's Code of Conduct has been drawn up in line with;

- ✓ The UN Universal Declaration of Human Rights and associated UN treaties
- ✓ OECD guidelines
- ✓ ILO conventions

Legislation cannot be replaced by Berdal's Code of Conduct; the law is decisive in a conflict.

Berdal suppliers and subcontractors must ultimately comply with all individual sections of the Code of Conduct. Each supplier signs the Code of Conduct, which confirms that it has taken note of and agrees with Berdal's Code of Conduct. Each supplier that is not affiliated with one of the relevant management systems (BSCI; WRAP; SEDEX(SMETA); SA8000; ISO 4001) completes a questionnaire on how they operate sustainably as part of the agreement. The signed agreement gives Berdal the right to carry out inspections to verify compliance.

Violation of the Code of Conduct by Berdal employees and by suppliers of Gripline, Pandser, Premiumfol and Konvox products can be reported to Berdal.



BERDAL CODE

& PEOPLE

HEALTHY WORK-LIFE BALANCE

We think a good “Employee journey” is very important and we want employees to be able to spend their careers within the organization fit and healthy at every stage of life - from start to termination of employment or retirement - with a good work-life balance. That is why we discourage overtime whenever possible. To encourage a healthier lifestyle, we continuously offer our employees free fruit, as well as training courses to stop smoking. With a cycling plan developed in-house, we motivate our employees to cycle to work. In addition, in collaboration with local work development company Ontplooi, we offer space to colleagues with a distance to the labor market.

EQUAL OPPORTUNITIES AND RIGHTS

Regardless of gender, race or religion, every Berdal employee has the same opportunities, rights and obligations. Both at our location in the Netherlands and in Poland, we strive for a balanced mix of employees when it comes to these aspects. We do not do business with suppliers where these values are demonstrably violated, or where there is the appearance that they are not being enforced.

1. Human rights & child and forced labour

Employees in the Berdal chain will be treated fairly, with respect and in accordance with internationally applicable human rights. Child labor is strictly prohibited. Our goal is to permanently eliminate child labor in the supply chain and to ensure that child labor is not transferred to other sectors, regions or countries. In addition, the rights of young employees must be protected at all times. Any form of exploitation of young workers is prohibited.

- ✓ To protect human rights, the sourcing and application of raw materials and minerals from conflict areas is prohibited. This is also in line with the EU regulation on conflict minerals, which came into effect in 2021. This regulation applies to four types of minerals: tin, tantalum, tungsten and gold. These minerals may be involved in financing armed conflict or associated with forced labour.

- ✓ The supplier must comply with the strictest requirements with regard to child labor that are included in the ILO and UN conventions and/or national laws and regulations.
- ✓ It is prohibited to allow working conditions that suggest slavery or are harmful to the health of employees. Our goal is to prevent and eliminate forced labor throughout the supply chain. Therefore, all work should be done on a voluntary basis and not under threat of any fine or sanction for the employees concerned. Forced labor, including imprisonment, involvement in servitude, deposit making, retention of identity documents, indentured servitude, human trafficking, or involuntary labor that violates fundamental human rights, shall not be used.
- ✓ The above mentioned children’s rights and duty of care of the supplier are in accordance with ILO conventions 79, 138, 142 and 182 and ILO recommendation 146.
- ✓ In accordance with ILO conventions 29 and 105, all forms of forced labour, including withholding a deposit and taking identity papers from employees upon entry into employment, are prohibited. With regard to allowing detainees to carry out activities, it is also prohibited to violate the regulations for the protection of basic human rights.

2. Labor Rights and Protection

- ✓ At the request of Berdal, the manufacturer or supplier will show which procedures apply with regard to worker protection and workers’ rights at work.
- ✓ The supplier will take appropriate and relevant measures with regard to vulnerable groups of employees. This includes young workers, pregnant women and mothers, and persons with disabilities. Measures depend on the degree of vulnerability. Supplier provides all employees with access to clean toilet facilities, with water for washing and drinking. Active cooperation between management and employees is essential to ensure a safe and healthy working environment for everyone.

BERDAL CODE & PEOPLE

- ✓ Working conditions that in any way violate basic human rights are prohibited. This is in accordance with ILO convention 155 and ILO recommendations 164 and 190. Without exception, employees must not be exposed to risky, unsafe or unhealthy situations.
- ✓ Physical assault, threats of physical assault, unusual punishment or disciplinary action, sexual and other harassment are strictly prohibited. Vulnerable individuals, such as, but not limited to, young workers, new and expectant mothers, and disabled workers receive special protection. The use of physical punishment, physical or mental violence and verbal abuse is prohibited at all times.
- ✓ All employees have the right to join or form trade unions, to join and/or participate in collective bargaining, to seek representation and to join works councils. These rights do not require prior management approval. Supplier shall not hinder, hinder or prevent such legitimate activities.

3. Healthy & safe working environment

Everyone involved in the supply chain in which Berdal products are made has the right to a healthy, safe and fair working environment, where employees are treated with respect and receive fair compensation for the work they do. Our suppliers are expected to treat their employees fairly and with respect.

Working hours

- ✓ Employee working hours must comply with regional, national (or relevant international) laws, regulations and industry standards, whichever provides more protection. Employees should not be required to work more than the maximum of 48 hours per week on a regular basis. They must be given at least one day off for every seven-day period.
- ✓ Overtime is voluntary, may not exceed 12 hours per week, will not occur regularly or be required, and will always be compensated with an additional allowance.



BERDAL CODE

& PEOPLE

Safe, healthy & hygienic workplace

The Supplier must ensure a safe and hygienic working environment. This ensures that best practices in health and safety are promoted, taking into account the specific hazards and risks of the relevant industry. The supplier ensures safe and clean conditions in all facilities

- ✓ To prevent accidents and limit health risks as much as possible, effective laws and regulations are applied. Supplier business partners shall take all appropriate measures within their sphere of influence to ensure stable and safe equipment and premises and ensure access to potable water, safe and clean dining and rest areas for employees and heating/air conditioning. Appropriate measures include tested air purification installations, certified fall protection and periodically checked fire protection equipment.
- ✓ The Supplier shall take appropriate measures to prevent accidents and damage to health related to or occurring during the work, by - as far as reasonably possible - minimizing the causes of hazards in the working environment.
- ✓ The supplier has a team and/or process for company emergency response and has a described company emergency plan; a scenario that systematically indicates what the organization should do if a calamity occurs.

When working with certain (hazardous) substances, the Supplier will take appropriate measures to protect employees, such as offering personal protective equipment and also providing access to adequate medical assistance and setting up facilities and systems that prevent and detect occupational accidents and illness.

4. Fair pay

- ✓ Suppliers are encouraged to provide their employees with adequate compensation, which at least covers living expenses and allows for additional expenses. Wages must be paid regularly and in full in legal means of payment.

- ✓ Illegal, unauthorized or disciplinary wage deductions are prohibited unless a freely negotiated agreement is in place. All employees are informed of their payment terms prior to employment and receive a copy of the employment contract. The Supplier will also provide a detailed payslip with information about the calculation of the wages per pay period.
- ✓ Better dialogue in the working environment, and industrial relations, where freedom of association is respected, where workers' representatives have a voice and where trade unions can negotiate collectively, are prerequisites for lasting improvements in fair pay for workers.

5. No Discrimination

Equal treatment and opportunity for employees, including but not limited to terms of hiring, compensation, access to training, promotion, compensation, termination of employment or retirement, are essential. The Supplier will not under any circumstances support or tolerate discrimination, in employment, including hiring, access to training, terms of employment, pay or benefits, etc., based on race, color, gender, age, religion, marital status, caste, social background, disability, pregnancy, ethnic or national origin, nationality, membership of workers' organizations, , political opinion, sexual orientation or any other that may give rise to discrimination.

- ✓ Migrant workers should have exactly the same rights as local workers. All employees must be treated with respect and dignity.
- ✓ Supplier will base all terms and conditions of employment on an individual's ability to do the job, and not on personal characteristics or beliefs as described above. The Supplier shall not engage in or tolerate harassment, intimidation or abuse of any kind.
- ✓ It is not allowed to discriminate with regard to employment, remuneration, access to education, promotion, dismissal or retirement.
- ✓ The above is in accordance with ILO conventions 100, 111, 143, 158 and 159.

BERDAL CODE & THE ENVIRONMENT

6. Environmental Principles

Procedures for waste management, handling and disposal of hazardous substances or chemicals (if any), and other hazardous materials, emissions, and wastewater treatment must meet or exceed regulatory minimum standards in accordance with regional, national, and international law. Suppliers take responsibility and take the necessary measures to prevent environmental degradation. They do this by preventing or minimizing adverse effects on the community, natural resources and the environment in general, without exception. Business partners and suppliers shall obtain, maintain and keep up to date all relevant environmental permits and registrations required, and comply with requirements regarding the operation and documentation thereof.

✓ Suppliers will endeavor to reduce or eliminate solid waste, wastewater and air emissions, including energy-related indirect air emissions, by implementing appropriate measures in their manufacturing, logistics, maintenance and facilities processes. Waste water from operations must be monitored and treated prior to discharge as required by relevant legislation. Airborne emissions must be identified, monitored and treated by the supplier prior to discharge or delivery. Also included are volatile organic chemicals,

aerosols, corrosives, particulates, ozone-depleting chemicals and combustion by-products generated by operations.

- ✓ All suppliers must identify and manage hazardous materials to ensure safe handling, movement, storage, recycling or disposal. Suppliers must therefore ensure that used substances and components comply with all (inter) national directives and the obligations regarding the REACH regulation of the European Parliament. No substances or components that are on the list of "Manufacturing Restricted Substances" or any other substance or component that is subject to an effective prohibition or expressly prohibited by Berdal should be used.
- ✓ The supplier shall comply with legal requirements and procedures for the processing of waste, use and disposal of chemical and/or harmful materials and substances. The emission or discharge and processing of waste water must at least meet the legal requirements.
- ✓ The above also ensures a minimization of packaging materials: Berdal strives at all times to minimize the packaging materials used for the products. The supplier will comply with this request as much as possible, always in full agreement with Berdal.



BERDAL CODE & BUSINESS ETHICS

7. Business Ethics & Integrity

A guiding principle in all activities and decision-making processes at Berdal is the promotion of ethical conduct. This ranges from promoting fair competition to preventing bribery.

- ✓ Fair Competition: Berdal respects the rules of free and fair competition in all business relationships. We expect equal behavior from our suppliers, and that suppliers do not act in violation of competition and/or antitrust laws.
- ✓ Corruption and anti-bribery: Berdal requires suppliers that corruption will never be tolerated, and that suppliers ensure that they comply with United Nations (UN) and Organization for Economic Co-operation and Development (OECD) anti-corruption conventions and comply with relevant anti-corruption laws in their business operations. Suppliers must not be involved in any form of corruption, extortion or embezzlement or any form of bribery.
- ✓ Anti-money laundering: Berdal expects its suppliers to comply with relevant legal obligations for preventing money laundering and not to participate in money laundering activities. Money laundering is the exchange of money or property that has been obtained criminally for money or other property that is 'clean'. The money or assets then no longer have a clear link to the criminal activity. The purpose of money laundering is to conceal the origin of the money. Suppliers and their employees are strictly prohibited from participating in or facilitating a money laundering transaction. Only legitimate business activities are conducted and cash or other assets suspected of being the proceeds of a crime are not accepted.
- ✓ Information & Privacy: The supplier respects the private life of its employees, including the right to privacy with domestic and family life in their homes. The supplier therefore ensures that the personal data of its employees is protected.
- ✓ Berdal expects its suppliers to comply in all cases with the rules of national legislation with regard to all activities of the company.

PROCEDURE AND PROGRESS

Berdal will work with its suppliers to ensure the guidelines and principles of this code. However, if corrective action and dialogue do not lead to further improvements or risk mitigation, Berdal may terminate the relationship with the supplier (in the event that the supplier does not comply with the Code of Conduct and does not cooperate with possible corrective measures or agreements).

- ✓ The supplier who does not (fully) comply with this Code of Conduct is obliged to inform Berdal in detail about the reasons for non-compliance. The supplier will also indicate when future compliance with the Code will be possible again.
- ✓ The principles of this Berdal Code of Conduct will be a permanent theme of the annual supplier assessments and (periodic) non-compliance with these principles will have consequences for future cooperation.
- ✓ The supplier will inform its employees and subcontractors about this Code of Conduct and ensure that it is observed. The supplier also ensures that its subcontractors accept and implement the COC to the extent possible within their sphere of influence.
- ✓ Outsourcing of work (to subcontractors) is permitted if the supplier informs Berdal whether and where this takes place. Transparency is expected with regard to the entire supply chain and all parties involved.
- ✓ Berdal and the supplier will evaluate this Code of Conduct annually and actively look for ways to improve the Code, both in terms of content and in extending it to suppliers further down the chain.

BERDAL CODE & BUSINESS ETHICS

- ✓ All Berdal suppliers that form the basis of the Gripline, Pandser, Premiumfol and Konvox brands have a supply chain policy and are ultimately affiliated with at least one of the relevant management systems to ensure the requirements set out in this COC: BSCI; WRAP; SEDEX (SMETA); SA8000; ISO14001.
- ✓ When suppliers are not affiliated with one of these social compliance standards, the supplier must complete the Berdal self-assessment to provide information on similar topics and themes. The Supplier is responsible for the correct implementation of the Code of Conduct and for continuous improvement, including corrective measures where necessary. Signing the COC or having it certified through one of these systems is step one; follow-up is an important second. Suppliers are expected to establish systems that can identify, monitor, understand and implement applicable laws, regulations and customer requirements. They must also be transparent and not mislead the Code of Conduct. Berdal and the relevant supplier will discuss this in order to provide the correct information.

Berdal will always look for opportunities to improve business practices and supply chain management. The joint improvement of the business relationship will always be paramount before, immediately and without mutual agreement, the supplier relationship is terminated.

Therefore, Berdal will take on a supporting role and investigate where it can best assist its suppliers to improve their operations, take corrective actions and/or implement other improvements that improve business operations.

- ✓ Berdal management will take responsibility for continuous improvements by taking corrective actions and reviewing the Code of Conduct periodically, as well as communicating the COC to all business partners. All business partners are expected to inform their suppliers, subcontractors and other business partners where relevant.
- ✓ Berdal requires all business partners and itself to do their utmost to comply with and continually strive for all the standards set forth in this Code of Conduct. In line with this commitment, Berdal will review and seek to optimize its procurement practices from suppliers at all times to raise awareness of potential challenges and bottlenecks within the procurement process that may affect suppliers. Purchasing practices can undermine corporate responsibility and compliance efforts; therefore, Berdal itself must also enable and facilitate its suppliers to comply with the requirements of the COC, with specific reference to occupational health and safety, working hours and other aspects that may be affected by capacity planning and productivity peaks.



SIGNING BERDAL CODE OF CONDUCT

If the supplier agrees with and complies with the conditions set out in this Code of Conduct, please return this form signed to Berdal:

Company Name:

[Company Stamp]

Name:

Position:

I am affiliated with the management system mentioned below:

Date:

City:



