

Code of Conduct



Stronger together

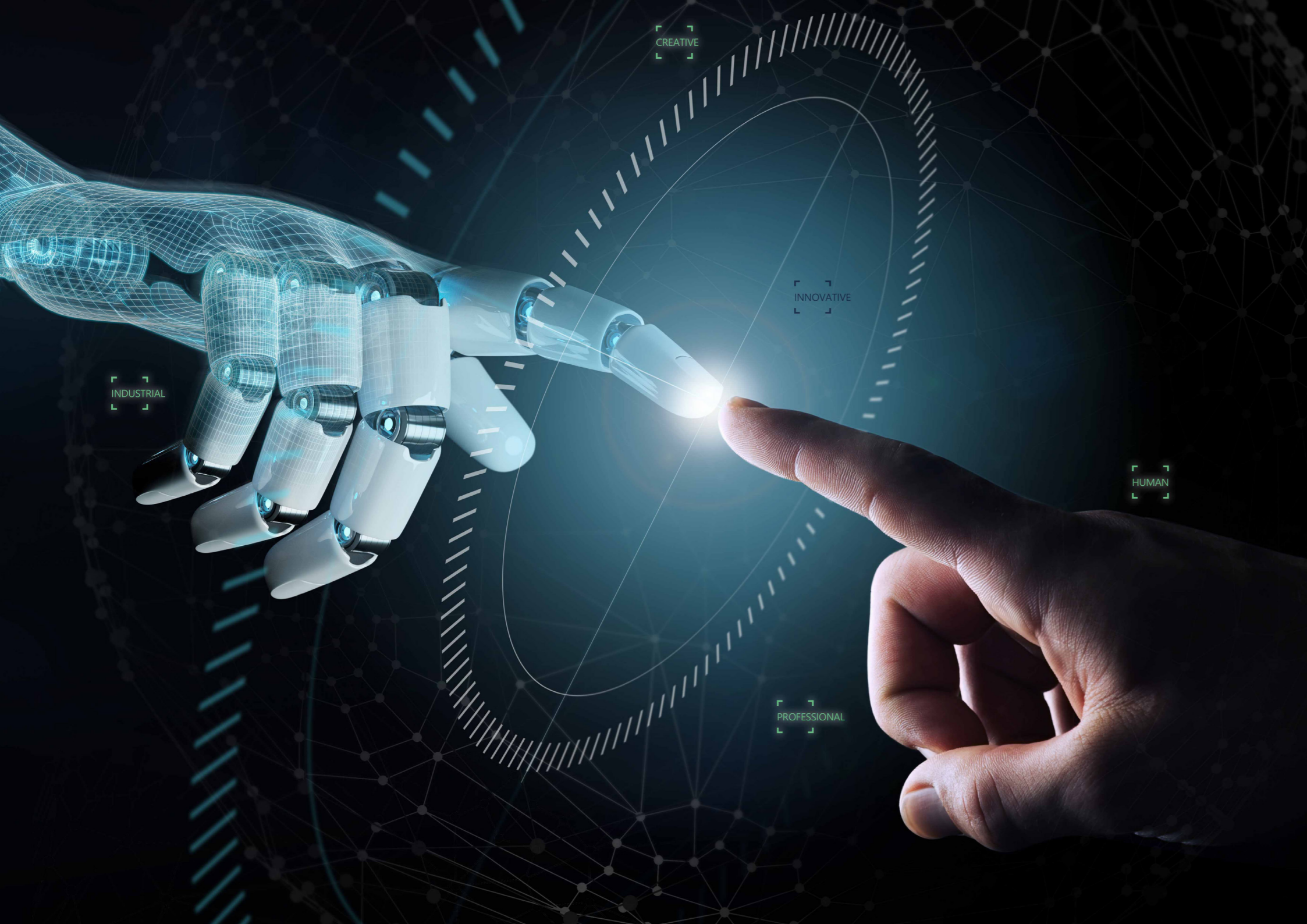


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- A. *As used in this Code, the terms “Company” and “BMT” include BMT, its subsidiaries, divisions, and business units. The term “employees” includes all Company Directors, officers, and full-time, part-time, and temporary employees.
- B. *BMT preserves the right to change and modify this Code of Conduct at any time, and to adapt it reasonably to new circumstances and the evolution of laws, rules and regulations. You will be informed of any change to the Code.

1.

Supplier Code of Conduct

1

Commitment

The BMT Group of companies is committed to integrity and compliance in everything we do. As part of that commitment, BMT expects its suppliers to provide their employees a safe working environment, treat their workers with dignity and respect, engage in environmentally sound and sustainable manufacturing processes, and comply with all applicable laws in the countries in which they conduct business. Suppliers are expected to foster a culture where employees and managers can communicate openly and raise concerns without fear of retaliation, intimidation, or harassment.

2

Purpose

The Purpose of the BMT Supplier Code of Conduct (the "Supplier Code of Conduct") is to provide direction and guidance to BMT's suppliers regarding BMT's commitment to integrity and compliance and set forth BMT's expectations within its global supply chain regarding People, Resources, the Environment, and Business Ethics and Compliance.

3

Supplier Obligations

This BMT Group Supplier Code of Conduct ("Code of Conduct") applies to all suppliers that provide products or services to BMT and its operating companies, divisions and subsidiaries (collectively, "BMT"). BMT requires its suppliers and their respective employees and subcontractors to comply fully with the Supplier Code of Conduct as a condition of doing business with any of the BMT companies. Suppliers must also be familiar with the business practices of their sub-suppliers and subcontractors and ensure that their sub-suppliers and subcontractors adhere to this Supplier Code of Conduct or their own Code of Conduct by flowing down the requirements of this Supplier Code of Conduct to their respective employees, sub-suppliers and subcontractors.

2. Compliance with laws, rules and legal regulations

BMT Group suppliers must comply with all BMT Group policies and all the applicable laws, rules, and regulations of the relevant countries and locations in which they operate and will maintain suitable measures to ensure compliance with such laws, rules and legal regulations.

The supplier shall comply with the applicable import and export control laws, regulations, government orders and policies controlling the shipment of goods, technology and payments. Supplier will not perform any act which would cause the BMT Group to be in violation of or exposed to adverse consequences under applicable export control laws or regulations. Supplier will not supply to the BMT Group any goods, software, technology, technical data, or services that are sourced from a restricted party or that have trans-shipped or transited through a country that is subject to any applicable sanctions. Supplier represents that neither Supplier, nor any of its affiliates, directors, officers, or agents, are designated for sanctions or export control restrictions (denied or restricted party).

3. Compliance with export control

4. Human rights and employment practices

Forced Child Labor

Suppliers shall not engage in human trafficking, use forced, involuntary, or slave labor, or purchase materials or services from companies engaging in such trafficking or using such labor. All BMT Group suppliers must be able to certify that materials included in their products comply with the slavery and human trafficking laws of the country or countries in which they do business. Unless applicable local law prescribes otherwise, suppliers may not hire employees under the age of Fifteen, or the minimum age for employment in that country, or the age for completing compulsory education in that country, whichever is higher.

Employment Practices

As a part of their employment practices, BMT Group suppliers must verify that all of their employees have the legal right to work in the relevant country and must ensure that all mandatory documents, such as work permits, are obtained. BMT Group suppliers must support diversity and equal opportunity in their workplaces and must prohibit discrimination based on race, color, gender, nationality, age, disability, union membership, maternity, sexual orientation, or marital status.

Harassment

BMT Group suppliers must treat all employees with respect and dignity and may not subject employees to corporal punishment, physical, sexual, psychological, or verbal harassment or abuse. Suppliers may not impose monetary fines upon employees as a form of discipline. Moreover, suppliers must maintain a workplace environment that allows employees to report concerns anonymously and without fear of retaliation. To the extent permitted by applicable local law, suppliers must have a reporting process that allows employees to report their concerns anonymously.

Wages and Work Hours

Suppliers must comply with applicable wage and work hour laws and regulations prescribing employee compensation and working hours. Suppliers may require employee overtime hours only to the extent consistent with a humane and productive work environment and applicable law.

Subcontractor Compliance

Suppliers agree that any workers supplied by subcontractors to work at the Supplier's facilities will be treated in a manner consistent with the principles set forth in this Supplier Code of Conduct.

Substance Abuse

Suppliers shall have policies and procedures in place to ensure that employees do not conduct work while under the influence of alcohol, illegal drugs, or medication abuse.

Freedom of association and collective bargaining

Supplier should respect the rights of its employees to associate freely, join or not join trade unions, bargain collectively, seek representation and/or join workers' councils in accordance with local, national laws and international conventions. Supplier must have policies in place that allow Employees to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination or retaliation.

5. Product safety, health and environment



Health and Safety

Suppliers must provide employees with a safe and healthy work environment and must take affirmative steps to support accident prevention and minimize overall health and safety exposure.

Environment and Sustainability

BMT expects its suppliers to integrate environmental responsibility and climate protection in particular into their business operations in a manner that minimizes negative impact on the environment and the local community, and protects natural resources, customers, employees, and the public. Suppliers must comply with all applicable environmental laws and BMT requirements, including, without limitation, laws related to air emissions, water discharges, toxic substances, and hazardous waste disposal in the conduct of their business.

Suppliers should have or subscribe to a written safety and health program. Suppliers are responsible for addressing and controlling worker exposure to potential safety hazards in conformance with all applicable standards and/or regulations.

Material & Conflict minerals

Suppliers must obtain and maintain sufficient knowledge of materials and components utilized in their respective supply chains to ensure such materials and components were obtained from permissible sources in compliance with applicable laws and regulations (e.g., in avoidance of Conflict Minerals). Suppliers may be required to validate the origin of any and all such materials and components.

Suppliers must comply with applicable laws and regulations regarding direct and indirect sourcing of “conflict minerals” including tin, tantalum, tungsten, their ores and gold originating from conflict areas and shall ensure compliance with such laws, will use its best efforts to avoid the use of raw materials in its products that directly and indirectly finance armed groups violating human rights.

Suppliers must establish and have in place a policy and a management system to reasonably assure that the “conflict minerals”, as well as other raw material, which may be contained in the products they deliver are sourced responsibly (i.e. with limited environmental impacts and not detrimental to Human Rights).

A close-up photograph of two hands shaking, symbolizing agreement or partnership. The hand on the left is wearing a black sleeve, and the hand on the right is wearing a red ribbed sleeve. The background is a solid blue color with a slight gradient.

6. Business ethics

Suppliers must not use the exchange of business courtesies (gifts) to gain an unfair competitive advantage. Suppliers must ensure that the offering or receipt of any gift or business courtesy is permitted by applicable laws and regulations and is not done with the intention to influence any BMT representative, BMT company, or any third party to whom they are given, to receive orders or a business advantage, or as an explicit or implicit exchange for favors or benefits. Any business courtesy must be given on behalf of the company, not in the name of an individual, and may not contain money or money related items (e.g., vouchers, gift certificates).

Gifts

Conflicts of interest

Employees are expected to act in the best interest of their company. Private interests and personal considerations shall not affect any business decision. BMT Group as well as the supplier will avoid any activity or situation which may lead to a conflict of private interest of a BMT Group employee or supplier and the business interest of BMT Group. A supplier becoming aware of a conflict of interest situation will immediately notify BMT about this.

Anti-Corruption, Anti-Money Laundering, and Improper payments

BMT does not tolerate any form of corruption. The payment of bribes, kickbacks, or similar payments is strictly prohibited, even when such payments are permitted under applicable local law. BMT Group employees, suppliers, and agents are strictly prohibited from accepting such payments under any circumstances.

Supplier must not offer, promise, make, accept or agree to accept any improper payments of money or anything of value to government officials, political parties, candidates for public office, or other persons. This includes a prohibition on so called 'facilitation' or 'grease' payments intended to expedite or secure performance of a routine governmental action like obtaining a visa or customs clearance, unless there is a formal legal governmental fee schedule for such expediting services and the government provides receipts. Personal safety payments are permitted where there is an imminent threat to health or safety. Suppliers must not offer any illegal payments to, or agree to receive any illegal payments from, any customer, supplier, their agents, representatives or others.

Supplier will have appropriate policies, risk awareness, risk assessment, and due diligence processes in place, to prevent bribery and corruption or money laundering in its dealings or in its supply chain. Supplier agrees to abide by and comply with all applicable anti-money laundering laws and regulations as well as any laws designed to ensure financial transparency, and to not participate in any money laundering activity. Supply Partner also agrees to implement effective internal controls.

Suppliers must not enter into formal or informal anti-competitive arrangements that fix prices, collude, rig bids, limit supply or allocate/control markets. They must not exchange current, recent, or future pricing information with competitors. Suppliers must not participate in a cartel or any activity that would unlawfully restrain or impact competition

Competition and antitrust

Protection of Confidential Information

Protection of confidential information is key to the success of BMT Group and its suppliers. Suppliers must protect all BMT Group information, electronic data, and intellectual property with appropriate safeguards. Suppliers will treat all confidential and proprietary information that it receives from BMT confidentially and shall only share such confidential information with its employees and third Parties as necessary and subject to an appropriate confidentiality or nondisclosure agreement signed between the supplier and its sub-suppliers, and suppliers, all of whom must comply fully with their obligations under such agreements with respect to the disclosure and use of such confidential and proprietary information.

Privacy

Suppliers shall comply with applicable privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Suppliers shall commit to protecting their Information Technology (IT) systems and Operational Technology (OT) systems to avoid unauthorized access to and disruption of their systems and shall otherwise safeguard their assets so as to protect the interests of their customers, employees, consumers and suppliers.



Maintain Accurate Records

Suppliers are expected to create, store and maintain business records, and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. Suppliers are expected to have in place appropriate related controls to ensure the above activities are accurately and securely performed. All records, regardless of format, made or received as evidence of a business transaction must fully and accurately represent the transaction or event being documented. Records should be retained based on the applicable retention requirements.



Suppliers are expected to develop, implement, and maintain effective methods and processes appropriate to their products to minimize the risk of counterfeit parts and materials being delivered. Effective processes should be in place to detect, report and quarantine counterfeit parts and materials and to prevent such parts re-entering the supply chain. If counterfeit parts and/or materials are detected or suspected, suppliers should provide immediate notification to the recipients of such counterfeit parts and/or materials.

Counterfeit parts

Protection of Intellectual Property

Suppliers shall respect intellectual property rights and safeguard proprietary information that it receives from BMT, its customers, or other third parties. Transfer of technology and know-how shall be done in a manner that protects all such intellectual property rights. Suppliers may not use any trademarks, trade names, patents, copyrights, or other intellectual property or similar rights of BMT Group, except to the extent explicitly authorized by BMT Group in writing and in its sole and absolute discretion.

7 ● Supplier management system

Suppliers should implement and maintain a management system to ensure they comply with the principles set forth in this Supplier Code of Conduct, as well as applicable laws, and regulations. BMT understands that such management systems may vary from supplier to supplier based upon the size and scope of the business and risks. The management system will be designed to ensure (a) compliance with applicable laws, regulations and customer requirements; (b) conformance with this Supplier Code of Conduct; (c) the identification and mitigation of risks, and (d) a process to track, measure and drive improvements in the management system. The system should also promote continuous improvement and compliance with changing laws and regulations.

Supply Chain Transparency

To monitor its suppliers' compliance with this Supplier Code of Conduct, a BMT company may: (a) request documentation; (b) conduct audits at the supplier's (or their subcontractors') facilities; and (c) require, review, approve and verify successful implementation of supplier's corrective action plans. Suppliers must cooperate fully with BMT Group with respect to any such requests or activities.

8. Reporting concerns

Speak up culture and whistleblower protection

BMT Suppliers are expected to inform BMT promptly of any concern related to this Supplier Code of Conduct affecting BMT, whether or not the concern involves the Supplier, as soon as the Supplier has knowledge of such an occurrence. Suppliers are expected to provide employees and third parties with access to adequate reporting channels to seek advice or raise legal or ethical concerns without fear of retaliation, including opportunities for anonymous reporting.

Violations of the BMT Group Supplier Code of Conduct can be reported confidentially to BMT Group in the following way:

Via BMT's Integrity Line, which can be accessed at: <https://bmt.integrityline.com>

BMT forbids retaliation against any person reporting such a concern.

Consequences for violating the code

In the event that the expectations of this Code are not met, the business relationship may be reviewed and corrective action pursued subject to the terms of the related procurement contract(s).



9. Supplier commitment

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The Supplier agrees that it shall comply with the principles of the BMT Supplier Code of Conduct by either complying with this Supplier Code of Conduct or by adopting its own code of conduct, which is consistent with the principles set out in BMT's Supplier Code of Conduct.

The Supplier will also take the necessary actions to flow down the Supplier Code of Conduct or its own code of conduct to its affiliates, subsidiaries and to their subcontractors involved in business with any BMT company.

BMT Group may discontinue its relationship with suppliers who fail to comply with this Code of Conduct in any respect.

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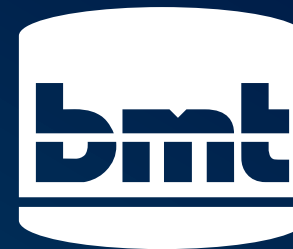
Supplier Name:

Signature:

Name and title of the authorised representative

Date





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