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The Bekaert Policy on Responsible Minerals Sourcing

THE PRINCIPLES OF THE BEKAERT POLICY ON RESPONSIBLE MINERALS SOURCING

Bekaert is committed to use raw materials of legal and sustainable origin. Bekaert refrains from sourcing conflict minerals as these might contribute to the financing of armed conflicts and enable human rights abuses. Bekaert also strictly avoids purchasing materials produced through child or forced labor. To achievement compliance with this commitment, Bekaert maintains due diligence processes and requests all relevant suppliers to fully cooperate in achieving this.

The Bekaert Policy on Conflict Minerals is mandatory for all suppliers delivering minerals potentially originating from conflict-affected and high-risk areas to the Bekaert Group. The Bekaert Policy on Conflict Minerals is applicable to all wholly and majority owned subsidiaries of Bekaert. Joint ventures in which Bekaert has a minority shareholding are strongly encouraged to apply the procedure.

This policy covers high-risk minerals as identified by the RMI: those covered by conflict mineral legislation as well as Cobalt (Co) and natural Mica which were added to the RMI due to significant concerns related to labour conditions.

“Conflict Minerals” refers to columbite-tantalite (coltan), cassiterite, gold (Au), wolframite, including their derivatives tin (Sn), tungsten (W), and tantalum (Ta).

The Procurement CoE Team in cooperation with the local purchasing teams and the Central Quality Department (CQA), is responsible for the communication to and liaison with the suppliers and Bekaert customers to obtain the required information regarding compliance to the Bekaert Policy on Conflict Minerals and to assess the addressed risks from the inputs gathered.

The Legal Department gives advice to maintain the Bekaert Policy on Conflict Minerals conform the applicable standards and legislation. The Communications Department has the final responsibility to publish publicly on a yearly basis a sustainability report which includes substantiation of the approach and the performance regarding sourcing of minerals potentially originating from conflict-affected and high-risk areas.

1. Background

Bekaert believes that economic success and conducting business in a sustainable way go hand in hand. Bekaert's global sustainability strategy is centered on four main pillars: our responsibility in the workplace, in the marketplace, towards the environment and towards society. Our efforts and activities are focused in such a way that balanced consideration is given to the interests of all respective stakeholders, i.e. employees, customers, suppliers, shareholders, partners, local governments and the communities in which we are active.

To this end, Bekaert requires that its suppliers adhere to high social, quality, environmental and ethical standards. Bekaert has developed a Supplier Code of Conduct (SP-Q-45001-BCQA) which outlines the minimum requirements to be met by our suppliers regarding fair business practices and ethics, labor practices, impact on the environment and health and safety performance. The Supplier Code of conduct is available on the Bekaert website in different languages. Bekaert requires every supplier to sign the Bekaert Supplier Code of Conduct or to provide evidence that their own equivalent Code of Conduct covers the same principles. Each supplier is strongly encouraged to apply this practice with their upstream suppliers in the supply chain.

Responding to the Bekaert obligations with respect to Responsible Minerals Sourcing is part of Bekaert's commitment. Bekaert is handling conform the applicable local legislations and the OECD Due Diligence Guidance by using the Conflict Minerals Reporting Template (CMRT) and Extended Mineral Reporting Template (EMRT) issued by Responsible Minerals Initiative (RMI). This is an initiative of the Responsible Business Alliance (RBA), formerly known as the Electronic Industry Citizenship Coalition (EICC), and the Global e-Sustainability Initiative (GeSi), that help companies from a range of industries address issues regarding the sourcing of minerals potentially originating from conflict-affected and high-risk areas in their supply chain.

2 Our commitment

Bekaert is committed to ensure that all components, parts and materials used to manufacture its products contain minerals from conflict and child/forced labor free sources.

Bekaert is committed not to buy any products and materials containing conflict minerals originating directly from conflict mines in the Democratic Republic of Congo (DRC) and the countries that share an internationally recognized border with the DRC ('High Risk Area').

Indirectly, Bekaert requires its suppliers to ensure that any minerals supplied to the Bekaert Group are not sourced from Conflict Mines in the High-Risk Area.

3 Our actions and our requirements towards our suppliers

- Bekaert requires its suppliers to provide components, parts or materials containing tantalum, tin, tungsten, gold, cobalt and/or natural mica from conflict and child/forced labor free sources only. Components, parts or materials which either directly or indirectly contribute to conflict, are unacceptable and will be rejected.
- Bekaert engages with suppliers that respond in a timely manner to Bekaert's requests for evidence of compliance and that allow their due diligence practices and relevant company records to be audited.
- Bekaert has included these requirements in the Bekaert Supplier Code of Conduct.
- Bekaert requires its suppliers to implement a policy regarding Conflict Minerals and to exercise due diligence to investigate the source of these minerals and to demonstrate evidence hereof to Bekaert upon request. In case the supplier has not yet developed a conflict minerals policy or due diligence procedure, a corrective action plan including timings should be presented and agreed upon between Bekaert and the supplier.
- Bekaert requires its direct suppliers to define, implement and communicate to their suppliers their own policies, outlining their commitments to responsible sourcing, legal compliance and measure for implementation.
- Bekaert requires its direct suppliers to create transparency and traceability about their minerals sourcing flows.
- Bekaert requires its suppliers to complete the latest version of the Conflict Minerals Reporting Template (CMRT) and Extended Mineral reporting Template (EMRT) created by the RMI (<http://www.responsiblemineralsinitiative.org/conflict-minerals-reporting-template/>) for the datasheets: Declaration, Smelter List (if applicable) and Product List regarding the delivered minerals to Bekaert within one month after request date from the Purchasing Department. The request will be sent for every new version of the CMRT and EMRT within one month after publication date. Suppliers are required to communicate each relevant modification in the supply chain immediately to Bekaert.

- All smelters or refiners listed in in Smelter List tab of the CMRT and/ or EMRT filled by supplier must be conformant. Bekaert does not accept deliveries of goods which contain minerals from non-conformant smelters or refiners and retains the right to return delivered goods, to claim costs which arose from such goods being delivered and to claim all damages suffered by Bekaert due to this.
- Any change to the smelters and refiners used in the supply chain shall be communicated to Bekaert by the supplier immediately.

The Conformant smelter & refiner Lists represent the smelters and refiners that have successfully completed an assessment against the applicable RMAP standard or an equivalent recognized assessment. The lists are available on RMI website - Smelters & Refiners Lists (www.responsiblemineralsinitiative.org)

4 Grievance mechanism and reporting

This policy will be reviewed regularly and updated as needed. Our employees, suppliers and other parties can report concerns any alleged violations of the Bekaert Policy on Conflict minerals to integrity@bekaert.com.

Our suppliers are encouraged to contact their regular Bekaert purchasing contact if they wish to seek guidance on the application of the Bekaert Policy on Conflict Minerals.

5 Corrective actions

Bekaert has the right to terminate, with immediate effect and without any damages begin due, upstream supply agreements when reasonable risk exists that the actual sourcing does involve conflict-affected and high risk areas, and/or when suppliers do not meet the requirements set forth by the Bekaert Policy on Conflict Minerals, and/or do not want to cooperate to reach the requirements based on a corrective action plan, and/or do not disclose information on their upstream supply channels within the requested due date.

DEFINITIONS/ABBREVIATIONS

CMRT	Conflict Minerals Reporting Template
EMRT	Extended Mineral Reporting Template
CPD	Central Purchasing Department
CQA	Central Quality Department
DRC	Democratic Republic of Congo
EICC	Electronic Industry Citizenship Coalition
GeSi	Global e-Sustainability Initiative
OECD	Organization for Economic Co-operation and Development
RBA	Responsible Business Alliance
RMI	Responsible Minerals Initiative
RMAP	Responsible Minerals Assurance Process