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1 PURPOSE OF THE PROCEDURE

Economic success and sustainable business are not contradictory but go hand in hand, better together. The Bekaert Supplier Code of Conduct 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.

2 MOTIVATION FOR CHANGE

New procedure

3 SCOPE

All Bekaert suppliers

4 DEFINITIONS/ABBREVIATIONS

CPD: Central Purchasing Department

5 SUMMARY OF RESPONSIBILITIES

CPD: responsible for the communication and liaison with the supplier, including the recording and monitoring of supplier compliance.



6 THE MAIN PRINCIPLES OF THE BEKAERT SUPPLIER CODE OF CONDUCT

6.1 Fair business practices and ethics

Any Bekaert supplier will uphold the highest standards of fair business practices and ethics, including:

6.1.1 Business Integrity

Bekaert suppliers shall not engage in any form of corruption, extortion, embezzlement or bribery. They shall comply with all applicable anti-corruption laws and regulations of the countries in which they operate, and all applicable international anti-corruption conventions. Any Bekaert supplier is obliged to foster fair and impartial competition. Bekaert suppliers shall adhere to international trade regulations and export control regulations.

Any Bekaert supplier shall avoid conflict of interest situations in relationships with Bekaert employees. Any supplier of Bekaert shall maintain an unquestionable standard of integrity, which includes that no excessive gifts and meals, entertainment, travel, accommodation or other gratuities will be offered to Bekaert employees.

Bekaert shall not support suppliers in evading tax, or let their owners or employees benefit from price settlements that are not in line with ethical business practices and with tax and other legal requirements.

6.1.2 Protection of intellectual property

All suppliers of Bekaert shall respect intellectual property rights and shall manage the existence of and information on technology and know-how in such a manner that the Bekaert intellectual property rights be adequately protected.

Also the Bekaert brand and logo is an example of property rights. Suppliers shall not use the Bekaert logo or publish Bekaert as a reference customer in their online or printed communication tools without prior consent from Bekaert. Such requests can be sent to corporate@bekaert.com. Bekaert maintains the right to cancel a given approval when the relationship with the supplier would be ended.

6.1.3 Confidentiality of information and disclosure of information

All suppliers of Bekaert shall treat the information obtained from Bekaert strictly confidential. Information regarding the suppliers' business activities, structure, financial situation and performance should be disclosed in accordance with applicable regulations.

6.1.4 Responsible sourcing of minerals

Bekaert is committed to use raw materials of legal and sustainable origin. Bekaert wants to avoid sourcing "conflict minerals" as they contribute to the financing of armed conflicts and enable human rights abuses. Bekaert maintains due diligence processes to achieve compliance with this commitment and requests relevant suppliers to fully support Bekaert in this respect.

6.1.5 Secure Business

All suppliers of Bekaert shall conduct their business in a secure manner and will implement reasonable measures for minimizing their exposure to security threats.

6.2 Labor practices

The Bekaert suppliers should support the 'United Nations Universal Declaration of Human Rights' and the conventions and the recommendations of its International Labor Organization.

6.2.1 Compliance with legislation

Suppliers of Bekaert shall comply with the laws and the collective labor agreements in the countries in which they operate. The suppliers' Code of Conduct and all respective practices should therefore be compliant with the related laws and regulations.

6.2.2 Freedom of association and the right to collective bargaining

Bekaert suppliers shall recognize the right of their employees to join or to refrain from associating freely and bargaining collectively.

6.2.3 Non-Discrimination

Bekaert suppliers should recognize and appreciate the existence of different values and cultural standards. Each supplier should commit to provide equal opportunity in employment and should not discriminate on the basis of age, race, nationality, social or ethnic descent, gender, physical disability, sexual preference, religion, political reference, or union membership. Only professional qualifications matter.

6.2.4 Fair labor conditions contracts, wages and working hours

A Bekaert supplier should be compliant with all applicable international, national and local laws and/or collective agreements relating to wages, benefits, working hours and working conditions.

6.3 Environmental stewardship

Bekaert expects its suppliers to comply with all applicable environment regulations and legislations.

Bekaert suppliers are committed to develop cleaner processes and aim to minimize the impact on the environment and follow best practices in environmental management, including energy and resource efficiency, limitation of CO2 emissions and other greenhouse gasses responsible water management, waste treatment and reduction and recycling.

6.4 Health and Safety

We seek to work with suppliers that provide a safe and healthy workplace for all of their employees. As a Bekaert supplier, you and your employees are committed to operate in a safe way whereby you are continuously working towards a goal of zero incidents. You provide your employees with all the necessary training and personal protection means.

Suppliers who are given access to Bekaert premises to conduct contracted services are obliged to acknowledge and fully comply with the Bekaert Health and Safety guidelines for visitors and outsourced contractors.

6.5 Suppliers

A Bekaert supplier is expected to implement a Supplier Code of Conduct in its upstream supply chain. The principles described in that Code of Conduct should at least match the principles of the Bekaert Supplier Code of Conduct.

6.6 Documentation and Monitoring

In order to ensure and demonstrate compliance with the Supplier Code of Conduct, you shall keep record of all relevant documentation, and provide to us supporting documentation upon request. This Code forms an integral part of Bekaert's supplier relationship management and evaluation procedure. Bekaert will take a risk based approach in assessing supplier's compliance with the requirements of this Code. Monitoring may take the form of self-assessments, site visits and follow up on remediation plans. Bekaert will work with its suppliers in addressing gaps identified.

7 CORRECTIVE ACTIONS

Bekaert reserves the right to disengage from suppliers that do not meet the requirements of this Supplier Code of Conduct or who cannot provide or commit to an improvement plan

8 REFERENCES/ANNEX

SP-Q-45001-F00-BCQA: The Bekaert Supplier Code of Conduct – Compliance Form

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