



Version 3 - July 14th, 2023

# Raise an Integrity Concern

## THE PRINCIPLES OF THE BEKAERT RAISE AN INTEGRITY CONCERN POLICY

This procedure is mandatory in NV Bekaert SA, its subsidiaries and consolidated entities where training was provided on the Code of Conduct.

This scope includes reporting of concerns for non-adherence to the Bekaert Code of Conduct and serious offenses and misconduct in financial, ethical or behavioral matters.

This scope includes e.g.:

- illegal acts
- violation of Bekaert policies including but not limited to anti-trust, privacy, insider trading
- incorrect reporting and accounting
- fraud and theft
- discrimination, hostile environment and sexual harassment
- bribery and corruption
- unauthorized disclosure of trade secrets and confidential information
- damages to safety and health of an individual
- any other conduct which would be likely to harm Bekaert, its reputation or its' employees

Topics not in scope include:

- cyber-security concerns (see SP-Q-36016-BCQA "Cyber Security and Resilience Policy")
- personal work-related grievances that are not non-adherences to the Bekaert Code of Conduct, e.g. interpersonal conflict between the reporting person and another employee.

Individuals working at all levels within or outside of Bekaert can report on integrity concern, or (potential) breach. Individuals who can report include:

- employees (whether permanent, fixed-term, or temporary) incl. for example blue and white-collar workers and managers across all entities of Bekaert, senior and executive managers, and members of the board of directors.
- external individuals, including those whose work-based relationship has ended or has yet to begin incl. for example consultants, contractors, trainees, casual workers/agency staff, volunteers, agents and distributors, joint venture partners and employees, vendors and customers.

'We act with integrity' is one of Bekaert's Values.

Speaking up to raise an integrity concern as early as possible protects the Bekaert community: our company, our colleagues and our stakeholders. It also helps the company maintain the highest levels of compliance with applicable laws, external and internal regulations, and ethical values. Consequently, every employee has the obligation to report any behavior that deviates from the Code of Conduct, deemed illegal, unethical, or against the interests of Bekaert. We believe that employees should feel safe in reporting, in good faith, any suspected wrongdoing or concerns, and we will safeguard those who speak up (the reporting person).

This procedure describes the processes related to reporting an integrity concern, or (potential) breach of the Bekaert Code of Conduct. It covers the scope, available reporting channels, the follow-up, and protection. Procedure also addresses the European Union's Directive for the protection of persons reporting on breaches of Union law (or 'Whistleblower Protection Directive') approved October 2019.

This policy is owned by the VP Ethics & Compliance, and managed by the Group Compliance Manager. Exceptions to adherence are subject to VP Ethics & Compliance approval.

It is important to disclose relevant information as soon as possible after employees become aware of the integrity concern. Early identification and disclosure of a concern will help to protect Bekaert and our employees. Reports about concerns may be made anonymously, but anonymous reports are not encouraged. Employees are encouraged to share their name and contact information when making a report, since this enhances the investigation process.

## 1. General

Non-retaliation, confidentiality, and privacy principles are strictly applied at any time. Any local legal requirements will be followed at all times.

### 1.1 Protection or non-retaliation

The reporting person will in no way be put at a disadvantage as a consequence of reporting an alleged breach of the Code of Conduct.

Retaliation (any act which occurs in a work-related context, prompted by reporting, and which causes or may cause unjustified detriment to the reporting person) against those who had the courage to speak up is not accepted in any form or manner. Any individual coming forward in such circumstances, regardless of the channel used, will be protected to the full extent possible. Bekaert has an obligation to ensure that employees do not suffer any detriment at work as a result of making a disclosure under the terms of this policy.

Moreover, retaliation is forbidden by multiple laws.

Examples of retaliation because of a raised complaint include:

- Suspension and lay-off
- Demotion or withholding of promotion,
- Transfer of duties,
- Negative performance assessment,
- Disciplinary measures, reprimands, financial penalty
- Intimidation, harassment.

Anyone who violates this non-retaliation regulation, may be subject to disciplinary measures.

This protection or non-retaliation principle includes third parties or facilitators that assist those who speak up, for example colleagues or relatives who could be affected by a disclosure.

## **1.2 Confidentiality**

The reporting person's identity or named individuals in the alleged breach will not be disclosed to any person beyond authorized staff members during and after ending the investigation. Where needed, senior management of the concerned department may be informed.

The investigation and outcome is confidential, and shall not be disclosed, except the summary outcome and conclusion to involved management.

Bekaert shall respect the anonymity of a reporting person who does not want to provide his/her name or personal information. The identity of the reporting person will only be disclosed in cases where there is a necessary and proportionate obligation under Union or national law in the context of investigations by authorities or judicial proceedings, in particular to safeguard the rights of defense of persons concerned.

## **1.3 Privacy**

Privacy laws must be followed at any time.

## **1.4 Training and Communication**

Employees within Bekaert are periodically trained on the Bekaert Code of Conduct, which includes a reference to this procedure.

In addition, this procedure is published on the intranet on the Code of Conduct page.

Additional communication is done via posters and a Frequently asked Questions (FAQ) document.

## **1.5 Local policy and legal requirements**

If there is a local whistleblowing procedure, it supplements this Group policy. If conflicting, the strictest procedure will prevail.

If stricter requirements are applicable due to local law, local management shall put these in place.

## 2. Raise an integrity concern

Every concern will be taken seriously. To allow an adequate follow-up process, it is important to document and be as specific and factual as possible. This will add to the credibility of the concern, and the likelihood of confirming the allegation from available resources.

Concerns will be addressed as quickly as possible. Concerns with more substance will be prioritized over concerns without sufficient documentation or information. Concerns without proper substance are more likely to be classified as non-substantiated, and false complaints or malicious complaints could result in disciplinary action towards the reporting person.

### 2.1 Available channels

Bekaert recommends using internal channels prior to external channels to raise a question/concern, and there are multiple internal channels available for this purpose.

Internal reporting will help to identify and address wrongdoing as early as possible. In addition, the internal channels exist to help build confidence and trust in this policy and process.

#### 1. Verbal internal reporting: Discuss potential concern with management

As a first option, each employee is encouraged to report an integrity concern to his or her supervisor, local management, or to his or her HR management. Employment-related concerns should be reported through this channel.

In addition:

- Regional/group IA department representative.
- VP Ethics & Compliance
- Group Compliance Manager (English/French/Dutch speaking) via Phone-call to +32.(0)56.76.76.70.

If reported under this procedure, this should be made clear by the employee. Bekaert shall complete and keep accurate records of the meeting/call in a durable and retrievable form, and offer the reporting person the opportunity to review, correct and approve the minutes of the conversation by signing them. The informed management representatives should report the relevant concerns via the Whispli reporting software available on <https://www.bekaert.com/misconduct>

## 2. Written internal reporting

As second option, employees are also encouraged to use other internal reporting tools:

Group channels:

- Report on Whispli reporting software available on <https://www.bekaert.com/misconduct> - this offers the possibility to raise concerns anonymously.
- Postal address: NV Bekaert SA, Bekaertstraat 2, BE-8550 Zwevegem, for the attention of Group Ethics and Compliance

The Group Compliance Manager performs the triage of and has the oversight over the concerns received at Group level.

## 3. External: local government/police or public disclosure

Employees and stakeholders are encouraged to first contact Bekaert via the available channels to allow Bekaert to quickly validate and address the concern raised.

Alternative external disclosure routes exist as well (government authorities, media), however especially for unproven or false reports, these alternatives may lead to damage to the reputation of individuals and/or Bekaert, and may violate labor or other laws.

## **2.2 Timelines**

If contact information is available, confirmation of receipt of concern should be sent to the reporter within seven working days of receipt.

## **3. Handling process**

External authorities may be informed and involved as needed during and upon closing of investigation. The process for involving external authorities is described in Bekaert's Investigation Protocol. (SP-Q-23019-BCQA)

### **3.1 Identification of investigator**

Investigation may be led by most appropriate employee as agreed with E&C department, depending on the topic; e.g. IA, HR, local management, E&C department representative.

## 3.2 Investigation

The format of the investigation may vary depending on the circumstances. Bekaert's Investigation Protocol documents the investigation process and highlights critical legal requirements that will be complied with while investigating a concern.

## 3.3 Timelines

Three months after the original date of raising the concern, a next communication should be provided to the initiator of concern, including:

- status of the investigation and follow-up steps taken during first three months after raising the concern,
- whether further investigations will follow, and if not, why not.

On a periodic basis, updates may be provided to the reporting person to provide assurance that Bekaert is taking his/her disclosure seriously.

# 4. Closure & Reporting

## 4.1 Closure

The outcome of the investigation will be summarized in a report listing all investigation steps taken, the conclusion and recommended remedial measures. The investigators should determine in the conclusion part whether the allegation(s) are (a) substantiated, (b) unsubstantiated (incl. inconclusive: means no true or false of the allegation can be substantiated with the evidence provided or investigated). Under the oversight of the Ethics and Compliance department the investigator will share a summary report with the respective management on a need-to-know basis. The Investigation Protocol provides all the details about this process.

Disciplinary measures (e.g., formal training, warning letter, letter of undertaking, dismissal for serious breach) towards employees may be a consequence of the investigation conclusion. Disciplinary measures will be decided by HR in cooperation with the Ethics and Compliance department and local management, and shared with the investigator. If an employee stepped forward and reported an activity in which he/she was involved, this will be considered when making further investigations and the employee may receive a lighter sanction than if they decided to keep quiet. The Investigation Protocol advises on the criteria that should be considered when selecting the appropriate disciplinary measures.

Upon closure of the case, where possible Ethics & Compliance dept. will communicate to the reporting person on the outcome of investigation, actions taken during the



investigation, and if any, disciplinary measures taken. This communication should be as soon as possible after the end date of the investigation.

## 4.2 Reporting

The Ethics and Compliance department maintains an overview of all reported cases with specific categories (e.g. substantiated vs. unsubstantiated concerns).

As outlined in the Investigation Protocol, on a quarterly basis the VP Group Ethics and Compliance and the Chief Legal and Compliance Officer report certain categories of cases to the Compliance Committee and to the ARFC.

## DEFINITIONS/ABBREVIATIONS

<b>ARFC</b>	Audit, Risk and Finance Committee of the Board of Directors of NV Bekaert SA, composed of at least three and maximum five non-executive Directors, including the Chairperson of the Board
<b>Bekaert</b>	Group Bekaert, including all entities trained on the Code of Conduct
<b>CoC</b>	The Bekaert Code of Conduct.
<b>Compliance Committee</b>	composed of CEO, CFO, CHR, General Counsel, VP IA - administered by VP Ethics & Compliance
<b>E&amp;C</b>	Ethics and Compliance department of Bekaert
<b>HR</b>	Human Resources department of Bekaert
<b>IA</b>	Internal Audit department of Bekaert
<b>JV</b>	Joint venture
<b>Legal</b>	Group Legal department of Bekaert
<b>Reporting person</b>	Natural person who reports information on integrity concern, or (potential) breach

## SUMMARY OF RESPONSIBILITIES

<b>Group Compliance Manager</b>	<ul style="list-style-type: none"> <li>• Recommends modifications to             <ul style="list-style-type: none"> <li>○ this Policy, as regulations and business environments evolve, and</li> <li>○ other Bekaert policies, practices or agreements relating to Speak Up &amp; Whistle-blowing</li> </ul> </li> <li>• First point of contact for multiple in-take channels</li> <li>• Investigates reported concerns if assigned as primary investigator</li> <li>• Coordinates with local investigators to ensure follow-up and proper investigation of concerns</li> <li>• Determines if is informed about disciplinary actions taken at end of investigation, if applicable</li> <li>• Updates overview of reported concerns</li> <li>• Ensures compliance with personal data privacy requirements</li> </ul>
<b>VP E&amp;C</b>	<ul style="list-style-type: none"> <li>• Presents breach overview periodically to the Compliance Committee</li> <li>• Determines which specific cases require specific attention during reviews</li> <li>• Presents specific cases to the Compliance Committee</li> <li>• Is informed about cases and maintains overview of cases</li> </ul>
<b>ARFC</b>	<ul style="list-style-type: none"> <li>• Breach overview is presented periodically to the ARFC</li> <li>• May request specific feed-back and follow-up for reported cases</li> </ul>
<b>Compliance Committee</b>	<ul style="list-style-type: none"> <li>• Breach overview is presented periodically to the Compliance Committee</li> <li>• May request specific feed-back and follow-up for reported cases</li> </ul>
<b>Head of IA</b>	<ul style="list-style-type: none"> <li>• Investigates specific cases in alignment with E&amp;C dept</li> <li>• Presents specific cases to the Compliance Committee</li> <li>• Is informed about cases and maintains overview of cases</li> </ul>
<b>Local Investigators</b>	<ul style="list-style-type: none"> <li>• Investigates specific cases if assigned as primary investigator. This may be multiple departments or leadership members dependent on the case and country/region; e.g. local HR, local Security department, local management, or external professional investigators</li> </ul>
<b>Legal</b>	<ul style="list-style-type: none"> <li>• Provides legal support as deemed required</li> </ul>

<b>Local management</b>	<ul style="list-style-type: none"><li>• Supports investigations</li><li>• Is informed about investigations and outcome</li><li>• Determines disciplinary action towards reported parties/employees for validated complaints, together with HR and department of involved employee and Ethics &amp; Compliance dept.</li></ul>
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