

BEWI RAW Holding B.V.

SUPPLIER CODE OF CONDUCT

In force as of 1st of July 2026 and approved by BEWI RAW MB

INTRODUCTION

BEWI RAW expects our partners to align with our core values by upholding the principles set out in this Supplier Code of Conduct. This includes maintaining high standards of occupational health and safety, fair labour practices, ethical business conduct, and environmental responsibility.

Suppliers must comply with all applicable laws in the countries where they operate and where services are delivered or received.

HUMAN RIGHTS AND WORKING CONDITIONS

BEWI RAW is committed to respect and comply with:

- International Bill of Rights
- The UN Guiding Principles on Business and Human Rights
- The UN Global Compact 10 principles
- The ILO Conventions
- The OECD Guidelines for Multinational Enterprises

Working Hours

ILO Convention No. 1 and 14

- Working hours shall comply with national legislation and applicable collective agreements. Workers shall be provided with at least one day off for every seventh day.
- Overtime shall be managed responsibly and in accordance with national law.

Wages

International Labour Standards on Wages

- Wages and benefits shall meet or exceed national legal minimums and applicable collective agreements.
- All workers shall receive a written contract detailing their wage conditions and payment methods before employment.
- Wage deductions for disciplinary reasons or discrimination are not permitted.

Freedom of Association

ILO Convention No. 87, 98, 135 and 154

- Respect workers' rights to freely associate, form and join workers organizations, and bargain collectively.
- Workers' representatives shall not be discriminated against and shall have access to perform their representative functions in the workplace.
- Where the right to freedom of association and/or collective bargaining is restricted under law, the employer shall facilitate, and not hinder, the development of alternative forms of independent and free workers representation and negotiations.

Health & Safety International Labour Standard on Occupational Safety and Health

- Suppliers shall provide a safe and healthy workplace in accordance with applicable laws and recognized industry standards

Child labour and young workers conditions

UN Convention on the Rights of the Child, ILO Conventions No. 138, 182, 79, and 146

BEWI RAW prohibits child labour in all business and supply chain activities:

- Minimum age for workers shall be 15 years, or the national minimum age, or the age of completing compulsory education, whichever is higher.
- No person under 18 years shall perform work that is hazardous to their health, safety, or morals, including night shifts.

Forced labour, modern slavery and human trafficking

ILO Conventions No. 29 and 105 Modern Slavery act

- Suppliers shall not use forced labour, including work required under threat of penalty or without voluntary consent.
- Migrant workers must be treated fairly, and their rights must be respected.
- Workers shall not be required to lodge deposits or identity papers and shall be free to leave with reasonable notice.

Non-Discrimination (Diversity and inclusion) & Harassment

International Labour Standards on Equality of opportunity and treatment

- Guarantee equal treatment and provide an inclusive working environment for all employees.
- Ensure there is no distinction, exclusion, restriction, or preference based on employee characteristics, based on characteristics such as gender, age, race, ethnicity, religion, disability, sexual orientation, or any other protected ground.
- Provide a workplace free from harassment, victimization, and discrimination.

ENVIRONMENTAL RESPONSIBILITY

BEWI RAW expects its suppliers to actively contribute to a circular and low-carbon economy by minimizing environmental impacts across their operations and value chains.

Suppliers are expected to:

- Comply with all applicable environmental laws, regulations, and recognized industry standards in every country where they operate.
- Implement appropriate environmental management practices in line with applicable laws and recognized industry standards. Manage waste responsibly and minimize pollution in accordance with legal requirements and industry best practices. Work to improve energy efficiency and reduce greenhouse gas emissions where feasible. Incorporate environmental considerations into procurement

decisions and regularly assess subcontractors and suppliers for environmental performance and compliance.

- Protect ecosystems and biodiversity by avoiding sourcing from protected or high conservation value areas and minimizing adverse impacts on land and water resources.

Support responsible sourcing practices in accordance with applicable laws and recognized industry frameworks.

BUSINESS ETHICS

Anti-Corruption

- Corruption, including money laundering, bribery, extortion, kickbacks, facilitation payments, and improper benefits (both private and professional), is not accepted in any form.
- BEWI RAW expect all suppliers to adhere to the principles set out in our Anti-Corruption Policy.

Data Protection

- Suppliers shall comply with all applicable laws concerning data protection and information security, ensuring that privacy is safeguarded, personal data is protected, and all business information is kept secure. Suppliers must ensure they cascade these principles to their subcontractors and tier suppliers and shall document adherence to these requirements.

Fair Competition/ Anti-Trust

- Comply with antitrust, trade practice, and competition laws, rules, and regulations against unfair competition and trade restraints.
- Do not enter agreements with competitors or take actions that unfairly impact competition, such as price fixing, bid rigging, or improper market allocations.

Conflicts of Interest

- Suppliers shall reveal actual or potential risk of conflict of interests in connection with BEWI RAW employees or their relatives, including personal relationships, financial interests, or any situation that could improperly influence business decisions.

Import/Export Controls and Economic Sanctions

- Suppliers must comply with all applicable export/import restrictions, economic sanctions, and financial regulations, including but not limited to those enforced by the U.S., the U.N., the EU and its member states, the U.K., and any related authorities, institutions or agencies.

Whistleblower Protection and Non-Retaliation

- If a supplier suspects or has evidence of corruption or misconduct by BEWI RAW, its suppliers, or employees, they shall immediately inform BEWI RAW.
- BEWI RAW prohibits retaliation against anyone who, in good faith, reports a potential breach of this Supplier Code of Conduct.
- Suppliers are encouraged to establish their own internal reporting channels for workers.

Management System

- Suppliers should ensure appropriate oversight of compliance with this Code.
- Responsible person shall distribute BEWI RAW's Supplier code of conduct and make it known in all relevant parts of the organization.
- Suppliers shall inform BEWI RAW of any significant subcontracting related to the products or services provided.

Compliance with this Code of Conduct

- BEWI RAW reserves the right to verify the Supplier's compliance with its Code of Conduct. Suppliers shall inform BEWI RAW of any significant subcontracting related to the products or services provided. If non-compliance is detected, Suppliers must take immediate action and conduct further assessments to ensure compliance.
- Non-compliance with BEWI RAW's Supplier Code of Conduct may result in contract termination.
- Suppliers shall respond to reasonable information requests in a timely manner.
- According to OECD Due Diligence guidelines, suppliers must prevent and address risks in their value chain.
- BEWI RAW reserves the right to make pre-announced or unannounced inspections at suppliers' facilities.