

SUPPLIER CODE OF CONDUCT

The Aalberts Industries group is committed to conduct its business with honesty and integrity, to follow the law and to make sure that each employee and business partner is treated respectfully. We expect our suppliers to do the same.

This supplier code of conduct (“**Supplier Code**”) explains the business standards and principles as rules of ethical behaviour of Aalberts Industries and specifies what Aalberts Industries expects from its suppliers.

Aalberts Industries is proud of its excellent reputation as a responsible and reliable business partner. Maintaining this reputation requires responsible management of our supply chain. For this reason, our suppliers are an integrated part of our responsible business strategy.

1. BUSINESS INTEGRITY

1.1 Compliance with laws

Our suppliers are expected to comply with all (local) laws and regulations applicable to their business activities.

1.2 Fair competition

Our suppliers must compete fairly and comply with applicable competition and anti-trust laws. Our suppliers are expected not to enter into agreements or practices that have a restrictive effect on competition, such as price-fixing, market allocation or abuse of dominant position.

1.3 Export control

We expect that our suppliers do not violate any national or international export controls or trade, economic or financial sanctions or embargoes applicable to them. Our suppliers identify and manage trade restrictions applicable to their business, including those of sanctioned countries and parties.

1.4 Prevention of fraud

Our suppliers are expected to conduct their work in a reliable and honest way. Our suppliers must have internal control systems in place to detect, prevent and respond to fraud and money laundering. Any potential fraud that may have an impact on Aalberts Industries must be reported to us immediately.

1.5 No corruption or bribery

We expect our suppliers to have zero-tolerance for corruption. Our suppliers will not make, offer or authorise bribes or conduct any form of unethical business practices and do not make facilitation payments. We expect our suppliers to refrain from offering or accepting gifts and entertainment that (a) are not reasonable and proportionate or (b) are offered with the intention to induce a person to improperly perform his function to secure a business advantage.

1.6 Avoid conflicts of interest

In the business dealings of our suppliers with us, we expect our suppliers to take decisions based on objective criteria only. Any factors that might influence the decisions of our suppliers due to private, business or other conflicts of interest must be prevented from the start. The same applies to relatives and other related parties. If a suppliers’ employee is related to an employee of Aalberts Industries, and this may represent a potential conflict of interest in a transaction or business relationship, our supplier must disclose this fact to Aalberts Industries or ensure that the employee of Aalberts Industries does.

1.7 Insider trading

The shares of Aalberts Industries N.V. are listed on the Euronext Amsterdam stock exchange. Our suppliers may not trade in Aalberts Industries N.V. shares or encourage others to do so, using confidential information. Disclosure of commercial or financial sensitive information is generally prohibited as it may affect the price of Aalberts Industries N.V. shares.

2. RESPONSIBLE WORK ENVIRONMENT

We expect that our suppliers are generally committed to apply the principles of the UN Global Compact and the OECD.

2.1 Health & Safety

Aalberts Industries strives for an accident free, secure and healthy work environment for all its employees and expects its suppliers to do the same. Our suppliers must apply all applicable safety rules and regulations and have a process in place to report and manage safety incidents.

2.2 No child labour or forced labour

We expect our suppliers to abide by applicable legislation and regulations on child and adolescent labour, and that they shall strictly refrain from employing children under the minimum years of age. Employees of our suppliers are not employees against their will, transported for exploitation, engaged in slavery or servitude, nor deprived of their rights.

2.3. Employment conditions

Our suppliers shall comply with all applicable legal and regulatory requirements and are generally committed to apply principles of the International Labour Organization (ILO). Working hours, wages, benefits will be fair and consistent with laws and industry standards, including those pertaining to minimum wages, overtime, other elements of compensation, and legally mandated benefits. We expect our suppliers to respect individual rights of freedom of opinion and association, including the right to collective bargaining.

2.4 No harassment and discrimination

Our suppliers do not demonstrate or tolerate harassment of any kind, including on the grounds of race, colour, religion, gender, sexual orientation, national origin, age, disability or any other type of behaviour that is hostile, disrespectful, abusive and/or humiliating.

2.5 Equal opportunity

We expect our suppliers to strive for equal opportunities for its employees.

3. ENVIRONMENT

Our suppliers comply with all relevant environmental laws and ensure that the necessary permits are in place. Our suppliers are committed to the efficient use of raw materials, energy and other natural resources while minimizing waste, emission and noise.

4. INTELLECTUAL PROPERTY AND COMMUNICATION

We expect our suppliers to respect intellectual property rights, including those of Aalberts Industries. There must be appropriate measures to prevent disclosure or unauthorized use of Aalberts Industries confidential information made available to them. Our suppliers will not issue any external communication about their business relationship with Aalberts Industries including but not limited to press releases

about Aalberts Industries without our prior written approval.

Our suppliers will protect the personal data of Aalberts Industries’ employees and customers and use this data for legitimate and authorized business purposes only. Our suppliers must be clear on when and how they collect, use or share personal data. All personal data is only processed in accordance with applicable data protection laws and regulations. Upon a breach of security our suppliers must immediately notify Aalberts Industries in accordance with applicable laws and regulations.

5. SUPPLIER RELATIONS

At Aalberts Industries, we expect our suppliers to communicate the business standards laid out herein to their subcontractors and sub-suppliers and to take these business standards into account when selecting sub-contractors and sub-suppliers. Our suppliers are expected to encourage their subcontractors and sub-suppliers to comply with the minimum standards of the Supplier Code regarding the protection of human rights, working conditions, anti-bribery and no corruption, export control and sanctions when fulfilling their contractual obligations.

6. COMPLIANCE WITH THE SUPPLIER CODE

Our supplier shall apply and monitor the observance of the principles described in the Supplier Code or equivalent principles. With prior notice, Aalberts Industries may conduct reasonable audits to verify compliance of our suppliers with the Supplier Code. Non-compliance with the Supplier Code may lead to measures, including termination of the relationship with the supplier.

CONFIRMATION

We confirm to comply with the business standards and principles provided for in this Supplier Code.

Company name: _____

Name: _____

Function: _____

Signature: _____