



supplier code of conduct

The Aalberts Group is committed to conducting its business with honesty and integrity, following the law, and ensuring that each employee and business partner is treated respectfully.

In this supplier code of conduct (Supplier Code) the business standards of Aalberts are explained. These business standards are derived from international standards such as the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

Aalberts takes pride in 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 integral part of our responsible business strategy, and they must adhere to this Supplier Code.

1. business integrity

Our suppliers must comply with all applicable (local) laws and regulations and ensure that all required permits are obtained and maintained. They shall uphold the highest standards of integrity including the following:

1.1 fair competition

Our suppliers must compete fairly and observe the applicable competition and anti-trust laws. They will not enter into agreements or engage in practices that have a restrictive effect on competition, such as price-fixing, market allocation or abusing a dominant position.

1.2 export control

All applicable national or international export controls and trade, economic or financial sanctions and embargoes will be observed. Our suppliers will identify and manage trade restrictions applicable to their business, including those related to sanctioned countries and parties.

1.3 prevention of fraud

Our suppliers must conduct their business in an honest way and 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 must be reported to us immediately.

1.4 no corruption or bribery

Our suppliers must have a zero-tolerance policy to prohibit any form of corruption. They shall not make, offer or authorise bribes, nor conduct any form of unethical business practices, including making facilitation payments. They shall refrain from offering or accepting gifts and entertainment that are (a) not reasonable and proportionate or (b) offered with the intention of influencing a person to improperly perform their duties to secure a business advantage.

1.5 avoid conflicts of interest

All business dealings will be free of conflicts of interest. Information regarding any actual or potential private, business or other conflict of interest must be immediately disclosed to Aalberts.

1.6 insider trading

The shares of Aalberts N.V. are listed on the Euronext Amsterdam stock exchange. Our suppliers will not use confidential information to either engage in or support insider trading. Disclosure of commercially or financially sensitive information is generally prohibited, as it may affect the price of Aalberts N.V.'s shares.

2. responsible work environment

Our suppliers will observe the Aalberts Human rights policy, which can be found at aalberts.com/code (link: [human rights policy.pdf](#)).

2.1 health & safety

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

Our suppliers abide by applicable legislation and regulations on child and adolescent labour, and refrain from employing children under the legal minimum age for employment. Under no

circumstances forced labour in any form, including but not limited to trafficked, indentured or bonded labour and slavery, may be used. Employees of our suppliers may not be deprived of their rights. Employees of our suppliers shall not be required to pay employers' agents or sub-agents' recruitment fees or other related fees for their employment.

2.3. employment conditions

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

2.4 no harassment and discrimination

Our suppliers shall not engage in nor 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 endeavour to provide equal opportunities for their employees.

3. environment

Our suppliers shall comply with all relevant environmental laws and ensure that the necessary permits are in place. Our suppliers are committed to conducting their business in an environmentally sustainable and resource-efficient way.

Hazardous substances and responsible sourcing

Our suppliers must ensure that goods provided to Aalberts comply with all requirements covered under the scope of all relevant laws, regulations and directives, such as REACH, RoHS, the US Toxic Substances Control Act and the US Resource Conservation and Recovery Act (RCRA). Further suppliers are required to have supply chain due diligence and reporting procedures in place with regard to minerals which may come from conflict-affected or high risk areas, including areas for which applicable laws (such as the Dodd-Frank Act) provide reporting requirements and/or usage, import or export restrictions.

4. intellectual property and communication

Our suppliers shall respect and safeguard Aalberts', or any other party's, confidential information, know-how and intellectual property rights. Suppliers must have appropriate measures in place to prevent disclosure or unauthorized use of Aalberts' confidential information made available to them. Suppliers will not issue any external communication about their business relationship with Aalberts without our prior written approval.

5. data protection / cyber security

Our suppliers shall comply with all applicable privacy and information security laws and regulatory requirements when processing personal data.

They must be transparent about how and why they process personal data. The personal data of

Aalberts' employees and Aalberts business partners will be properly protected. In case of a data breach the supplier must without undue delay and within the mandatory timeframe, notify Aalberts in accordance with the applicable laws and regulations.

Our suppliers must adhere to applicable security and cyber-security regulations and standards, and immediately report to Aalberts any suspected or actual incidents that may impact Aalberts.

6. general and product liability insurance

Our suppliers shall obtain and maintain sufficient general and product liability insurance (including product recall insurance) for their liability under the law and vis-a-vis Aalberts.

7. supplier relations & compliance with the Supplier Code

Our suppliers must communicate the business standards laid out herein to their subcontractors and sub-suppliers and ensure that these business standards are observed by them.

Suppliers must take appropriate measures in the event of actual or suspected violations of these standards and shall inform Aalberts promptly about the identified violations and the measures taken.

Aalberts may verify compliance with the Supplier Code a.o. with self-assessment questionnaires and/or audits at the supplier's premises during normal business hours after giving reasonable advance notice. At Aalberts' request, the supplier will provide all the information reasonably required by Aalberts for fulfilment of its obligations under the law, regulations or directives (such as CSRD and CSDDD).

In case of non-compliance with the standards of this Supplier Code, Aalberts reserves the right to take measures including suspending or immediately terminating of the relationship with the supplier.

8. speak up!

Our suppliers must allow their employees to confidentially report (possible) violations of the Supplier Code. No employee may be discriminated against or penalized for reporting non-compliance with the Supplier Code.

In the event of a breach of this Supplier Code, or if there are concerns or questions, this may be reported (anonymously) through the Aalberts Speak Up portal at [Aalberts.com/speakup](https://aalberts.com/speakup).

confirmation

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

Company name:

Name:

Function:

Date:

Signature: