

## Code of Conduct for Business Partners

**Bruynzeel Storage Systems carries out its activities on the basis of the core principles of Integrity and Corporate Social Responsibility. We expect the same from our business partners, such as suppliers, distributors and agents. This Code explains these core principles and specifies what Bruynzeel Storage Systems expects. It sets out what we stand for.**

### **Compliance**

In this Code of Conduct for Business Partners, Bruynzeel Storage Systems has set down the principles governing its business transactions with its business partners. We expect them to act in accordance with all laws and regulations relating to the activities carried out for Bruynzeel Storage Systems. We expect all our business partners to adhere to the basic principles of this Code, or to adopt similar principles. In the event of any doubt or ambiguity, the relevant contact person at Bruynzeel Storage Systems should be asked for clarification. Failure to comply with this Code may result in action being taken, including termination of the business relationship as well claims being brought for damages and other rights.

We affirm our adherence to the core principles of this Code.

Name:

Company name:

Signature:

## **Integrity**

### **Honest business practices**

Our business partners shall conduct their business honestly, openly and with integrity. They shall not offer or justify bribery, nor shall they support any form of unethical business practices. They shall not pay bribes.

Entering into a business relationship with or for Bruynzeel Storage Systems or accepting certain general terms and conditions is not contingent on gifts or entertainment.

Our business partners shall not offer Bruynzeel Storage Systems employees gifts or entertainment of excessive value. They shall never offer cash, or cash equivalents such as gift vouchers, to our employees.

### **Fair competition**

Bruynzeel Storage Systems strictly prohibits restrictive agreements or practices, such as price-fixing, restriction of the supply of goods or services, bid rigging, market sharing or abuse of a dominant position. Our business partners shall not offer misleading products or services, or offer them on behalf of Bruynzeel Storage Systems. We require our business partners to pursue free and fair competition and to comply with the relevant laws and regulations relating to competition.

### **Trade controls**

Our business partners shall comply with all applicable import and export control legislation, including, but not limited to, sanctions, embargoes and other laws, regulations and government measures that control the transfer or shipment of goods and payments. They shall be familiar with and manage trade restrictions that apply to their transactions with us, including possible sanctions against countries and parties.

### **Conflicts of interest**

Conflicts of interest between a business partner and Bruynzeel Storage Systems must be avoided. Conflicts of interest may relate to external business activities, personal or private interests, financial interests and/or 'inside' information. Personal or friendly relationships with an employee of Bruynzeel Storage Systems shall never be used to influence the professional judgement of that employee. If such a situation arises, or if there is a potential risk of a conflict of interest in a transaction or business relationship, our business partner must report this to Bruynzeel Storage Systems. Our partners shall not provide financial or other support to political parties to influence transactions with or for Bruynzeel Storage Systems.

### **Company resources**

If they use or have access to Bruynzeel Storage Systems resources, including employees, systems, networks and facilities, our business partners must use these resources appropriately, in accordance with Bruynzeel Storage Systems' instructions and for their intended business purpose only.

### **Fraud prevention**

Our business partners must have internal controls designed to detect, prevent and respond to fraud and money laundering. Transactions must be properly recorded and subject to review. Any potential fraud that may have an impact on Bruynzeel Storage Systems must be reported to us immediately.

### **Data protection, confidential information and intellectual property**

Our business partners shall comply with all applicable data protection laws. It is the business partner's responsibility to ensure that all

confidential business information or trade secrets obtained through business activities with Bruynzeel Storage Systems (hereinafter referred to as 'confidential information') are kept strictly confidential and are not used improperly or disclosed to third parties. Our business partner must also protect and safeguard the intellectual property of Bruynzeel Storage Systems as confidential information.

### **Proper communication**

Timely and factual communication with us is essential for a good and fruitful relationship. Our business partners shall carefully consider their business communications and shall not publish press releases about us, our products or our business relationships without our express, prior approval.

## **Corporate Social Responsibility**

### **Human rights**

Our partners shall treat all individuals with respect and honesty. Our partners shall recognise the rights of all, as enshrined in the Universal Declaration of Human Rights and the UN Guiding Principles on Business and Human Rights including, but not limited to, the prohibition of forced or child labour, and the provision of reasonable wages, social benefits and working hours, individual rights to freedom of opinion and association and other fair terms and conditions of employment. They shall accept responsibility for avoiding human rights violations and, if necessary, for restoring human rights as a result of activities carried out for us and products manufactured for us.

They shall create a working environment free from retaliation, discrimination and harassment based on gender, age, race, colour, ethnicity, culture or origin, citizenship, religion or belief, physical or mental disability, sexual orientation or any other characteristic protected by applicable law.

### **Environment and society**

Our business partners shall comply with all relevant environmental laws and have the necessary permits. They shall contribute to the efficient use of raw materials, energy and other natural resources and reduce waste, emissions and noise pollution. They shall be involved in the society in which they operate and respond to any complaints and concerns.

### **Objections**

Our business partners shall provide an opportunity for their employees and other stakeholders to raise concerns about violations, or potential violations, of legislation and of the principles of this Code of Conduct. These concerns shall be examined and handled in a fair and transparent manner.

### **Applicability to subcontractors**

All parties engaged by our business partners to perform work on behalf of Bruynzeel Storage Systems or on behalf of Bruynzeel Storage Systems shall be made aware of the principles of this Code and shall act in accordance therewith.

## **CODE OF CONDUCT FOR BUSINESS PARTNERS**

This Code sets out the general requirements applicable to all business partners of affiliated companies of the Bruynzeel Storage Systems Group. Specific contractual provisions setting higher standards shall take precedence over these General Terms and Conditions. Where this Code conflicts with specific legislation, the legal provisions will always prevail.