

SUPPLIER CODE OF CONDUCT & SIGNATURE

1. Introduction

At Fabory Masters in Fasteners Group B.V. including its subsidiaries, ("Fabory"), we are committed to operational excellence, ethical and responsible conduct, fair and respectful treatment of all individuals, and practices that promote safety, health and environmental protection.

Fabory's business is based on close, long-term relationships with customers, suppliers and other business partners. With this Supplier Code of Conduct, we communicate to our suppliers that we expect them to operate as Fabory; in accordance with internationally recognized standards on Human Rights, Labour Rights, Environment and Anti-corruption.

The Fabory Supplier Code of Conduct or equal requirements must be communicated to all of the suppliers 1st tier sub-suppliers providing products or material to Fabory.

2. General Principles

Comply with the laws and regulations in each country in which the supplier operates

Where there are differences between the provisions of this Supplier Code of Conduct and national laws or other applicable standards, suppliers shall adhere to the higher or more stringent requirements.

Demonstrate and promote its commitment to responsible business practice in policies, decisions and activities

Supplier shall upon request by Fabory, provide evidence of its compliance with the obligations set out in this Supplier Code of Conduct.

Fair competition

Fabory respects and is committed to the rules governing free and fair competition and to comply with applicable antitrust and other laws regulating competition. Our suppliers shall equally commit to competing in a fair manner in compliance with all applicable competition laws and regulations.

When conducting business with Fabory, our suppliers shall deal fairly with all individuals and entities with whom they interact and shall not take advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material acts, or any other unfair dealing or practice.

Our suppliers shall not engage in collusive binding, price fixing, price discrimination or other unfair trade practices in violation applicable antitrust and other laws regulation competition

Confidentiality

Our suppliers shall not disclose nor use for their on purposes of any other Fabory trade secrets,

confidential information, knowledge, designs, data, skill, or any other information considered by Fabory as sensitive information.

Our suppliers shall respect the intellectual property rights of Fabory and of others, observe and respect all patents, trademarks, and copyrights, and comply with all requirements and terms of their use.

3. Anti-corruption

Suppliers that Fabory makes business with must not use illegal payments, bribes, kickbacks or other questionable inducements to influence any business transaction. Fabory specifically prohibits bribery by any of its employees or agents. A practice that conflicts with this policy might be considered acceptable in a particular country, however it is not acceptable for Fabory.

4. Principles of Human rights and social justice

Suppliers must support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in human rights abuses.

Non-discrimination

All employees of the supplier shall have equal opportunities based on competencies, experience and performance regardless of gender, race, religion, age, disability, sexual orientation, nationality, political opinion, union affiliation, social background or ethnic origin. All employees should be treated with respect. Discrimination, physical or verbal harassment, or any illegal threats are not tolerated.

Forced labor

Supplier will not engage in or support forced, bonded or compulsory labor, nor shall the Supplier require any form of deposit or confiscate identification papers from employees.

Child labor

Fabory respects the children's right to development and education. Suppliers must not engage in child labor. The supplier shall ensure that no employee is younger than the legally fixed age for employment. Minimum age is the age for completion of compulsory schooling, but not younger than 15 years or not younger than 14 years in those countries that are subject to the developing country exception to the ILO Convention 138.

The supplier should abide by the United Nations Convention on the Rights of the Child (1989) and comply with all relevant national and international laws, regulations and provisions applicable in their country of production or operations.

Freedom of association

Suppliers must respect the right of employees to join any organized associations of their own choosing and to bargain collectively as permitted by local laws and regulations. Suppliers shall

respect the recognized unions. The supplier should also equally respect an employee's right to refrain from joining a union.

Working hours and compensation

Suppliers shall comply with applicable laws, agreements and industry standards on working hours and compensation.

5. Health and Safety

Suppliers to Fabory shall safeguard a healthy and safe working environment for all employees, in accordance with international standards and national legislation. Where the supplier provides its employees with accommodation such facilities must as a minimum be clean, safe and meet the employees' basic needs.

A supplier must establish organizational structures and procedures for the effective management of health, safety and environmental risks. Appropriate information and training on health and safety should also be offered to the employees.

6. Environment

A supplier should take preventive measures in relation to environmental challenges, undertake initiatives to promote greater environmental responsibility and encourage the development and diffusion of environmentally friendly technologies. A suppliers' actions should be based on the relevant national and international laws, regulations and standards in respect to environment. Supplier shall minimize its environmental impact and continuously improve its environmental performance.

7. Material compliance & Conflict minerals

At Fabory, we are determined to comply with regulatory and customer requirements regarding the prohibition and restriction of substances, including hazardous substances and conflict minerals. Therefore, suppliers shall ensure that the goods provided to Fabory are in compliance with requirements covered under the scope of all relevant . environmental regulations. Suppliers shall perform sufficient efforts to avoid substances of very high concern (SVHC) and are obliged to inform Fabory in writing if such SVHC is present in the supplied products in excess of 0,1% (weight).

The Candidate List of Substances of Very High Concern (SVHC) is related to the REACH directive EC 1907/2006 and is regularly updated. The latest edition of the SVHC-list is available via the links underneath. Items that are ordered according to RoHS compliance legislation, shall supplementary comply with the latest edition of the RoHS directive 2015/863.

REACH link: <https://echa.europa.eu/regulations/reach/understanding-reach>

SVHC link : <https://echa.europa.eu/candidate-list-table>

RoHS link : <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32015L0863&from=EN>

Supplier warrants that all the products and components provided to Fabory do not directly or indirectly contain Conflict Minerals, as defined by the United States Dodd Frank Act, Section 1502. Fabory requires manufacturing companies to identify and disclose the source of 3TG minerals (tin, tantalum, tungsten and gold) used in products supplied to Fabory upon request.

Finally Fabory expects its suppliers to provide Fabory in writing and as early as possible and before delivery of the products, valid documentation about:

- any permit requirements (for example Dual Use) applicable to products that are being delivered and result from the applicable Dutch, European (EU), American (USA) and Asia export, tariff and trade laws;
- the Country of Origin of the products they supply to Fabory based on applicable export, tariff and trade laws.

8. Auditing & Reporting

Fabory has a culture of ethics and compliance. Fabory team members are trained on Ethics and Compliance annually. If a supplier is neglecting Fabory's request to comply to this Code of Conduct, or is refusing to provide a plan and proof of action to be in compliance with this Code of Conduct, Fabory may decide to stop any cooperation with the supplier."

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Dear Supplier,

At Fabory we are committed to operational excellence, ethical and responsible conduct, fair and respectful treatment of all individuals, and practices that promote safety, health and environmental protection.

With this Supplier Code of Conduct (SCoC), we communicate to our suppliers that we expect them to operate as Fabory; in accordance with internationally recognized standards on Human Rights, Labour Rights, Environment and Anti-corruption.

We ask you as a supplier, or potential supplier, to acknowledge that you have received, understood and agree to comply with Fabory SCoC by way of signing this letter and sending it back to your sourcing contact person at Fabory.

In case you have your own Code of Conduct, there is an option to submit this in place of signing Fabory SCoC, provided that the content is in line with the Fabory SCoC.

Fabory reserves the right to actively verify and audit your compliance with Fabory SCoC. Audits may be performed either by Fabory employees or by a third party auditor assigned by Fabory. The latest version of Fabory SCoC is always posted on www.fabory.com/terms_and_conditions/code_of_conduct and it is your responsibility to stay updated of any changes.

In case of any discrepancy or inconsistency between the English version and the local version, the English version shall always prevail.

We hereby agree to adhere to all principles outlined in the Fabory SCoC

Company
Address
Date
Name
Title
Signature