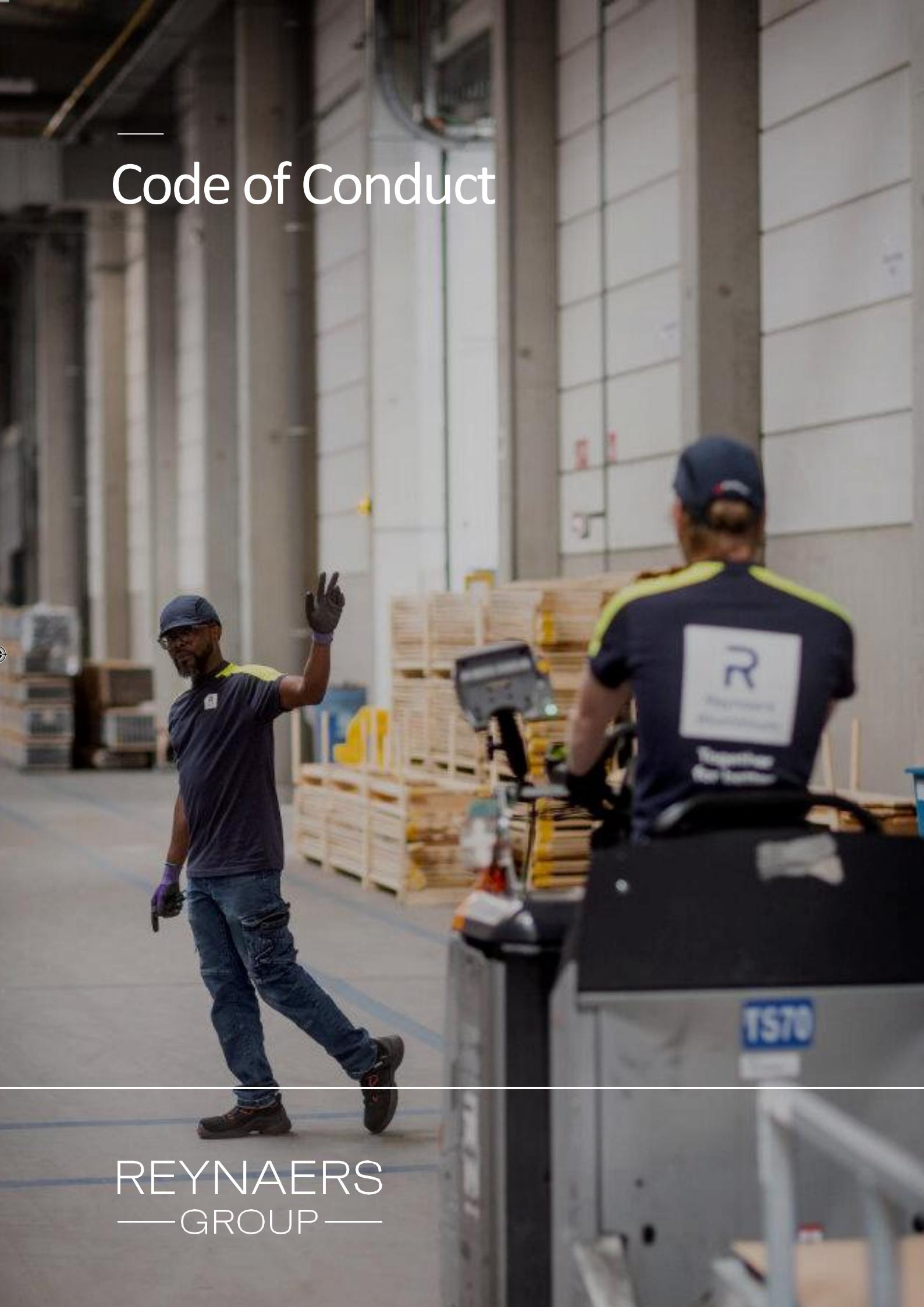


Code of Conduct



REYNAERS
— GROUP —

Introduction

This Code of Conduct from the Reynaers Group is the fundamental commitment to guarantee trust and reliability between our company and all our stakeholders. We are fully aware of the responsibility we bear towards employees, suppliers, shareholders, commercial partners, and the communities in which we work. Therefore, the main purpose of this Code of Conduct is to ensure that all persons acting on behalf or for the account of the Reynaers Group worldwide perform their activities ethically and in accordance with laws, regulations and explicit policies and guidelines. On the other hand, we expect all our business partners to respect and act according to the same principles, specified in this document, available online.

International guidelines

The Reynaers Group commits to respect Human Rights as defined by the eight Fundamental Conventions of the International Labor Organization and the United Nations Guiding Principles on Business and Human Rights, as well as the International Bill of Human Rights.

This Code of Conduct also encourages to go beyond legal compliance, drawing upon internationally recognized standards, to advance social and environmental responsibility and business ethics. In no case can complying with the Code of Conduct violate local laws. Where national law and the international human rights standards differ, The Reynaers Group follows the higher standard; where they are in conflict, The Reynaers Group seeks to respect internationally recognized human rights to the greatest extent possible.

Who does it apply to?

The Reynaers Group expects its own company, the supply chain, communities, potentially affected groups, and other relevant stakeholders connected to The Reynaers Group's business operations, products and services to follow this code of conduct.

If requested by the Reynaers Group, suppliers will complete a self-assessment questionnaire regarding the compliance with this Code of Conduct and the steps the supplier has taken to ensure that the supplier and its subcontractors fully comply.

Suppliers will allow The Reynaers Group to audit compliance with this Code of Conduct by inspecting their facilities, reviewing records, policies and practices and interviewing personnel. Suppliers are expected to provide prompt access to their facilities, records, documentation and will ensure the necessary assistance by their personnel.

If The Reynaers Group identifies any non-compliance, suppliers must prepare and permit the Reynaers Group to review and execute an improvement plan approved by the Reynaers Group to rectify matters.

Subject to any contractual terms, The Reynaers Group may terminate the supply relationship if a supplier fails to comply with this Code of Conduct. If appropriate, the Reynaers Group may report any breach of the Code of Conduct to the appropriate authorities.

This Code of Conduct is a statement of certain fundamental The Reynaers Group principles, policies and procedures that govern The Reynaers Group 's employees and representatives. It does not create any right for any customer, supplier, competitor, shareholder or any other person or entity.

Climate & Environment

We expect our employees and all our stakeholders to commit to sound environmental practices, prioritizing the efficient use of natural resources (including the use of water), preserving biodiversity and ecosystems, and minimizing greenhouse gas (GHG) emissions. This includes adopting measures to reduce energy consumption and water usage, maintaining high standards for air, water and soil quality. This commitment extends to adopting measures to mitigate pollutants, prevent contamination, and ensure the responsible management of hazardous waste to minimize environmental harm.

We emphasize the importance of circularity, encouraging sustainable production and consumption practices. We expect respect for natural resources and adherence to environmental laws to ensure sustainable economic business and avoid environmental risks.

Labor & Human rights

We are committed to uphold the human rights of workers, and to treat them with dignity and respect as understood by the international community. This applies to all workers including temporary, migrant, student, contract, direct employees, and any other type of worker (including in the supply chain).

Gender & Discrimination

The Reynaers Group is committed to strive for diversity and an inclusive work culture, valuing all individuals, without any form of discrimination (e.g. ethnicity-, race- and gender-based discrimination). In that sense, The Reynaers Group provides equal employment opportunities and treats all employees fairly and expects the same from its partners.

Freedom of association

The Reynaers Group expects the rights of the employees to freedom of assembly and association to be respected. The employees or their representatives must have the opportunity to assemble, organise themselves and communicate openly with the company management about working conditions. While collective bargaining will be carried out in accordance with applicable laws, The Reynaers Group actively promotes open dialogue and cooperation between employees and management, even in countries where formal rights to collective bargaining may be limited.

Child labour

In no case shall the work or employment of persons ages under the legal working age permitted as this prevents children or teenagers from complying with compulsory schooling or training requirements and is harmful to their health or development. We are committed to the abolition of child labour and ensuring adequate protections for workers above the legal working age.

Forced labour.

In any case the use of forced or compulsory labour is prohibited.

Violence, harassment and abuse

Harsh or inhumane treatment, including violence, gender-based violence, sexual harassment, sexual abuse, corporal punishment, mental or physical coercion, bullying, public shaming, or verbal abuse of workers, is strictly prohibited. Additionally, the threat of any such treatment is also unacceptable. Disciplinary policies and procedures supporting these requirements must be clearly defined and communicated to all workers.

Compensation and working hours.

Employees must be paid in a timely manner and excessive working hours must be always prevented. Compensation and working hours must comply with the respective national laws and regulations regarding working hours, overtime, wages, social security, benefits and vacation time. The Reynaers Group is also committed to aspiring toward the provision of a living wage, ensuring that all employees are compensated fairly, enabling them to meet their basic needs and maintain a decent standard of living, regardless of local minimum wage standards.

Health & Safety

All applicable occupational health and safety laws and regulations shall be complied with, and a safe and healthy working environment to prevent accidents and injury shall be provided. In all cases, employees must receive the appropriate personal protective equipment. Workers must have the right to refuse unsafe working conditions without fear of reprisal until management adequately addresses their concerns.

Worker exposure to physically demanding tasks, including manual material handling, heavy lifting, prolonged standing, and highly repetitive or forceful assembly tasks shall be identified, evaluated, controlled and improved.

Access to water, sanitation and hygiene

Employees shall have access to an adequate supply of drinking water and be provided with appropriate lighting, temperature control, ventilation, and adequate sanitary facilities. Personal protective equipment must also be supplied. Additionally, all employees must receive regular and relevant training in health, safety, accident prevention, and emergency procedures in the workplace.

Emergency prevention and preparation

Emergency situations should be anticipated, identified and assessed and their impact should be minimized by implementing emergency plans and response procedures.

Hazardous materials handling procedures

Worker exposure to chemical, biological, and physical agents is to be identified, evaluated, and controlled. If any potential hazards were identified, opportunities to eliminate and/or reduce the

potential hazards shall be investigated. If elimination or reduction of the hazards is not feasible, potential hazards are to be controlled through proper design, engineering, and administrative controls. When hazards cannot be adequately controlled by such means, workers are to be provided with and use appropriate, well-maintained, personal protective equipment free of charge. Protective programs shall be ongoing and include educational materials about the risks associated with these hazards.

Management systems that address health & safety risks

Eliminate physical and chemical hazards where possible and set in place procedures to manage, track, and report occupational injury and illness.

Appropriate building construction (incl. electrical and fire safety)

Building construction and electrical equipment shall be evaluated for safety hazards. Appropriate fire detection and suppression equipment, clear and unobstructed egress and adequate exit facilities shall be provided.

Governance

Corruption and bribery

The Reynaers Group does not tolerate any kind of corruption, bribery or any type of unlawful granting of advantages. Any benefit promised or received with the intent to influence the decision-making process, both to business partners and to public officials, is forbidden. The offering of gifts or other favours can only be given or granted, provided they comply with locally accepted good business practice and they are transparent and reasonable, both with respect to value and frequency, without expectation of any kind of return.

The Reynaers Group employees shall not misuse company information or company property for their personal or any third-party benefit.

Fair competition

To guarantee the principle of fair competition and free market, we do not tolerate any corruption or infringements of antitrust laws. All The Reynaers Group employees are expected to respect free competition and comply with the international anti-bribery standards, as stated in the United Nations Global Compact, as well as with local anti-corruption laws. They are forbidden from being involved in anticompetitive agreements with third parties and from seeking or accepting advantages for themselves (or for any close relations) that are improper.

Tax

The Reynaers Group demonstrates ethical tax behaviour and pays the proper amounts of taxes in the countries where value is created. We pursue a strong relationship with governments. Transparency and trust are embedded in our business principles and corporate culture, thus play an important role in the way we engage with fiscal authorities throughout the world. The Reynaers Group acts in accordance with all applicable (tax) laws and regulations at all times. We aim to comply with the spirit as well as

the letter of the law. Any action related to planning our tax position must be consistent with the normal course of business and in line with our overall group strategy.

Data protection, intellectual property and privacy laws

Protecting intellectual property rights, data protection and respecting privacy from The Reynaers Group, employees, suppliers and other business partners is the responsibility of all parties (whether as data controller or data processor). All information and intellectual property rights must be used legitimately and maintained with care and respect, while avoiding abuse and preventing damage. Unauthorized transfer of information is strictly prohibited.

The Reynaers Group comprises the following subsidiaries:

 Reynaers Aluminium	Development and marketing of aluminium profile systems for the building envelope.	Duffel, BE
 forster	Development and marketing of steel profile systems.	Romanshorn, CH
 alural	Powder coating and anodizing of aluminium products.	Tisselt and Lummen, BE
 ROVAL ALUMINIUM	Development and production of aluminium construction products for roofs and facades.	Helmond, NL
 Somalu	Production of aluminium joinery for residential housing.	Castres, FR
 BLOXER	Production of special steel structures and frames with safety glass for windows and doors.	Padua, IT
 AITA	Customized information solutions, computer and storage systems, networks and security services.	Sint-Katelijne-Waver, BE

Signature



Bert Geerinckx

CEO Reynaers Group

Review history

Approval date: 03/03/2025

Effective date: 15/03/2025

Review date This Code of Conduct will be reviewed, at the latest, every 5 years.