

# CODE OF CONDUCT

The Renson Group (hereinafter referred to as “Renson”) highly values its social responsibility and is committed to conducting business in an ethical, lawful and sustainable manner by adopting an Environment, Social & Governance (“ESG”) strategy. Renson also expects the same level of commitment from its partners, suppliers, contractors, subcontractors and service providers, including their affiliates and subcontractors (the “Renson Partner(s)”).

In this spirit, Renson has created this code of conduct (the “Code of Conduct”), which sets forth the minimum key expectations and standards regarding the conduct and business operations of the Renson Partners.

By adopting this Code of Conduct, the Renson Partner undertakes to implement all the principles contained herein and to ensure that its own suppliers, (sub)contractors, agents and service providers shall do the same, as Renson is committed to itself and its employees by incorporating this Code of Conduct into its employment policy(s) and by guaranteeing the principles of this Code in its own business operations. Upon the request of Renson, the Renson Partners will provide sufficient evidence that they have communicated and cascaded this Code of Conduct or requirements materially consistent with this Code of Conduct through their supply chain(s).

## 1. COMPLIANCE WITH LAWS

Renson Partners must comply with all governmental laws, rules and regulations applicable to them. This includes, but is not limited to, applicable laws, rules and regulations relating to environmental protection, anti-bribery and anti-corruption, antitrust, fair competition, fair trade practices, human rights, employment and labour practices, and occupational health and safety.

Renson Partners are expected to continuously monitor changes in such laws, rules and regulations and promptly adapt their practices and policies accordingly.

## 2. ENVIRONMENT

### 2.1. GENERAL

Renson Partners shall comply with the applicable environmental laws and standards. They shall use their best efforts to reduce the negative environmental impact resulting from their business operations, and to implement the principles of sustainability, resource efficiency, minimal energy consumption, biodiversity, ecological responsibility, reduced pollution, and a circular economy within their business operations.

### 2.2. SUSTAINABLE RESOURCE AND ENERGY MANAGEMENT – POLLUTION PREVENTION AND CONTROL

Renson Partners are expected to implement sustainable resource management practices, including responsible sourcing of raw materials, energy efficiency measures, and waste reduction strategies.

Renson Partners are required to adopt energy-efficient manufacturing processes and resource-efficient practices to reduce their environmental footprint (including but not limited to greenhouse gas emissions, water usage, waste generation, and pollution levels). Efforts

\* The following companies are affiliated with the Renson Group: RENSON NV, RENSON OUTDOOR NV, ARLU NV, eSafe BV, Renson Fabrications Ltd, Renson Inc, Louage & Wisselincx, Renson Shanghai, Corradi, Corradi USA, Corradi Srl. The aforementioned is a non-exhaustive list of the Renson Group affiliates, which may be subject to change from time to time.

should be made to reduce emissions of pollutants, such as air and water pollutants, and to manage waste responsibly, including proper disposal and recycling practices.

Preference will be given to suppliers who prioritize renewable resources and materials with lower environmental impacts.

### **2.3. PROTECTION OF ECOSYSTEMS AND BIODIVERSITY**

Renson Partners must respect and protect ecosystems and biodiversity in the areas where they operate.

Activities that pose a threat to critical habitats, endangered species, or ecosystems of high ecological value should be avoided or minimized.

## **3. SOCIAL**

### **3.1. HUMAN RIGHTS, DIVERSITY, EQUITY AND INCLUSION**

Renson Partners shall respect the internationally recognized human rights of each individual. They are expected to promote inclusivity and diversity within their business as well as their supply chain.

Renson Partners shall not discriminate against any individual on the basis of race, colour, religion, nationality, ethnic origin, age, gender, disability, sexual orientation, civil status, pregnancy, maternity or paternity, political or personal belief, union membership, etc.

Equal opportunities must be applied for the appointment, employment, remuneration, promotion, dismissal, and retirement, taking into account the importance of diversity and gender equality.

### **3.2. HEALTHY AND SAFE WORK ENVIRONMENT**

Renson Partners shall establish a respectful, safe and healthy work environment and shall ensure that employees are not subject to hazardous working conditions, taking into account the industry standards and applicable laws. Renson Partners shall therefore also ensure that harassment and/or abuse, of any form whatsoever (e.g. physical, psychological, sexual, ...) is not exercised, tolerated, and/or overlooked in their work environment.

Renson Partners shall take all necessary actions and precautions at all times to mitigate and/or prevent work-related accidents, injuries, illnesses or death and shall implement appropriate occupational health and safety training for employees as well as an appropriate response plan should one of the aforementioned circumstances occur.

### **3.3. CHILD AND FORCED LABOUR**

Renson Partners shall not use or tolerate any form of forced, compulsory or child labour and shall not conduct business with business partners using such forms of labour.

More specifically, Renson Partners shall never use forced labour, whether directly or indirectly, and labour shall always be performed on a voluntary basis. This means that all labour, whether temporary or permanent and whether full-time or part-time, shall be organized through fair written contractual agreements that respect the rights of the employees and subcontractors.

Renson Partners shall not employ children under the legally minimum employment age in the corresponding legal system. In any event, Renson Partners shall not employ children under the age of 15 without prejudice to stricter applicable laws in the corresponding legal system.

### **3.4. FREEDOM OF ASSOCIATION**

Renson Partners shall respect the right of employees to freely form and join labour associations for the purpose of protecting their employment interests and right, to the extent permissible by law.

### **3.5. EXCESSIVE WORKING HOURS**

Renson Partners shall ensure that their employees work in compliance with all applicable laws and industry standards pertaining to regular working hours and overtime hours, including for breaks, rest periods, holiday and parental leaves, salaries and wages, employee benefits, etc.

## **4. GOVERNANCE**

### **4.1. FAIR BUSINESS PRACTICE**

Renson Partners shall enter into business relationships based on ethical practice and fair competition. They will avoid conflicts of interest, operate honestly and uphold the highest standards of integrity.

Renson Partners shall comply with the applicable laws and regulations against money laundering and tax evasion. They will keep accurate and detailed financial records with respect to their business in accordance with applicable laws and regulations.

### **4.2. ANTI-CORRUPTION AND ANTI-BRIBERY**

Renson Partners shall neither tolerate nor engage in any form of corruption or influence peddling and shall not grant, offer or promise, or ask for, directly or indirectly, anything of value to or from a public official or a private-sector employee to influence actions or obtain an improper advantage. This includes any facilitation payment.

Exchanges of gifts or invitations may not be used to gain an unfair competitive advantage. In any business relationship, Renson Partners must ensure that the offering or receipt of any gift, invitation, entertainment or business courtesy is permitted by law, for a legitimate purpose, reasonable, and without intention to influence, and that these exchanges do not violate the rules and standards of the recipient's organization and are consistent with reasonable market place customs and practices.

### **4.3. INTELLECTUAL PROPERTY**

Renson Partners shall refrain from infringing intellectual property rights of third parties and shall only use third-party intellectual property rights on a legitimate basis.

## **5. MISCELLANEOUS**

### **5.1. CONTINUOUS IMPROVEMENT AND INNOVATION**

Renson Partners are encouraged to continuously improve their environmental, social and governance performance through innovation, development or adoption of new technologies, and sharing of best practices.

Furthermore, Renson Partners are encouraged to collaborate with all applicable stakeholders (including customers and partners) to drive sustainability across the supply chain.

## **5.2. COLLABORATION FOR IMPACT**

Renson Partners are encouraged to collaborate with Renson and other stakeholders to address shared social, environmental and sustainability challenges and drive positive change across industries.

## **5.3. MONITORING AND EVALUATION**

Renson (or its authorized representatives) may engage in monitoring activities to assess whether a Renson Partner was or is adhering to this Code of Conduct. Such activities may include, but are not limited to, on-site audits, document reviews, requests for information, and stakeholder consultations.

## **5.4. TRANSPARENCY AND REPORTING**

If and to the extent that Renson is required (by law) to report and/or disclose information (in any way, shape or form) on the principles covered in this Code of Conduct or on social, environmental, governance and/or sustainability matters in general, the Renson Partners shall, at the request of Renson, fully cooperate and comply with Renson's request to provide them with all the required information and documents in order for Renson to be compliant with all such applicable laws and regulations.

The Renson Partners shall ensure that all information requested by and provided to Renson shall be transparent, accurate, sufficiently detailed, provided through verifiable metrics and methodologies, and (as the case may be) in accordance with all applicable (international and/or national) sustainability reporting standards.

## **5.5. COMPLAINTS PROCEDURE**

The Renson Partners shall ensure the proper implementation of a grievance mechanism. Accordingly, each employee and/or representative of a Renson Partner should be able to submit questions and/or raise complaints or concerns related to a (potential) breach of this Code of Conduct to [compliance@renson.net](mailto:compliance@renson.net) or via the website [www.renson.net](http://www.renson.net) on an anonymous and confidential basis.

Submitting a question and/or raising a complaint or concern regarding a Renson Partner's (non-)compliance with this Code of Conduct shall in no way create a disadvantage or consequence towards the reporting party. Each question, complaint and/or concern shall be assessed and handled in a serious and confidential manner.

## **5.6. NON-COMPLIANCE REMEDIATION**

In the event that one or more of the aforementioned principles are not fully satisfied in the context of the practice of the Renson Partner, the latter shall report such without undue delay to Renson and shall take the necessary corrective measures to ensure the satisfaction of the terms of this Code of Conduct and prevent recurrence.

Any violation of the principles of this Code of Conduct may jeopardize the business relationship with Renson and can result in the termination of the relationship with the Renson Partner.

The latest version of the Code of Conduct can be found on [www.renson.net](http://www.renson.net)