

Dulimex Supplier Code of Conduct

Introduction

This Code of Conduct has been crafted by Dulimex B.V. (referred to as “Dulimex” henceforth) to establish a framework for ethical and responsible business practices among our suppliers. At Dulimex, we are committed to fostering a sustainable and transparent supply chain, and we expect our suppliers to adhere to the principles outlined in this Code of Conduct. This document outlines the minimum standards that we strive to uphold within our supply chain and reflects the core principles and values of Dulimex.

Our Vision on Corporate Social Responsibility (CSR)

Dulimex is an international trading company specialized in high-quality products for professional use across various industries, including construction, industrial, agricultural, maritime, and the do-it-yourself sector. We serve as a crucial link connecting the global landscape of producing, trading and processing ironmongery, construction hardware, hinges and locks. Our vision entails serving as a responsible trading partner, contributing to a sustainable and socially responsible supply chain.

Our CSR Goals and Standards

At Dulimex, we prioritize environmental stewardship and the well-being of individuals working within our supply chain. We collaborate closely with our partners to minimize adverse social and ecological impacts while maximizing positive outcomes. Through this Code of Conduct, we articulate our objectives regarding key CSR issues. Achieving these goals hinges upon the support of our suppliers and other business partners.

We expect our suppliers to adhere to the outlined standards to the best of their ability, given their sphere of influence. We expect our suppliers and their partners within the supply chain to respect this Code, with our direct suppliers assuming responsibility and accountability for compliance. We encourage our suppliers to work collaboratively with their own suppliers to identify and address any potential risks of negative social or ecological impact.

On Our Code of Conduct

1. Human Rights & Labor Conditions

We uphold universal human rights as outlined in the Universal Declaration of Human Rights by the United Nations (UN) and the fundamental principles and rights at work set forth by the International Labour Organization (ILO).

From our suppliers, agents, distributors, and other business partners, we expect:

- ▶ **Safe and healthy working conditions:** Suppliers are required to maintain a safe and healthy working environment for their employees in compliance with applicable laws and regulations, and to take appropriate measures to prevent accidents and occupational diseases.
- ▶ **Equal treatment:** Suppliers are to treat all customers and employees equally, regardless of race, gender, religion, nationality, ethnic origin, sexual orientation, disability, or any other personal characteristics.
- ▶ **Fair labor conditions:** Suppliers must provide their employees with fair wages that are at least equal to the minimum wage in the country of operation. They must also adhere to maximum working hours and overtime compensation as stipulated by national legislation.
- ▶ **No child labor:** Dulimex does not tolerate any form of child labor. Suppliers must adhere to the minimum age requirements for employees in the country of operation.
- ▶ **No forced labor:** Dulimex does not tolerate forced labor, including human trafficking and slavery. Suppliers must ensure that their employees work voluntarily and are not subjected to coercion or intimidation.
- ▶ **Freedom of association and collective bargaining:** Suppliers must respect their employees' right to associate and form unions.

2. Environment, Hazardous Substances & Conflict Minerals

We take measures to reduce our ecological footprint, have knowledge of the composition and origin of the raw materials and minerals used in our products and adhere to legal minimum standards in accordance with regional, national, and international laws.

From our suppliers, agents, distributors, and other business partners, we expect:

- ▶ **Environmental awareness:** Suppliers are expected to operate in an environmentally conscious manner and take measures to minimize their environmental impacts.
- ▶ **Pollution prevention:** Suppliers must take measures to minimize air, water, and soil pollution.
- ▶ **Efficient use of resources:** Suppliers should strive to efficiently use resources and energy to reduce waste.
- ▶ **Waste management:** Suppliers should implement responsible waste management systems in accordance with national or local laws and regulations and aim for the reuse and recycling of materials.

▶ **Knowledge of hazardous substances:** Suppliers must research the source and chain management of raw materials and minerals in their supply chain and ensure that the substances and components used comply with the REACH regulation of the European Parliament. No substances or substances listed on the “Manufacturing Restricted Substances” list are to be used.

▶ **Conflict minerals guarantee:** Suppliers must take necessary measures to ensure that the products supplied to us do not contain conflict minerals. Conflict minerals, as described in the Conflict Minerals Regulation of the European Union (EU), are substances such as tin, tantalum, gold, and tungsten that are directly or indirectly sourced from conflict areas or adjacent countries and traded internationally by violent groups.

3. Integrity & Business Ethics

We promote integrity in all activities and decision-making processes and adhere to the conventions of the United Nations (UN) and the Organization for Economic Cooperation and Development (OECD) concerning the fight against corruption and relevant anti-corruption laws.

From our suppliers, agents, distributors, and other business partners, we expect:

▶ **Fair competition:** Suppliers must respect the rules of free and fair competition in all business relationships.

▶ **Antitrust law:** Suppliers must refrain from corruption, bribery, extortion, embezzlement, and other unethical business practices.

▶ **Corruption and bribery:** Suppliers must refrain from corruption, bribery, extortion, embezzlement, and other unethical business practices.

▶ **Conflict of interest:** Suppliers must avoid conflicts of interest.

▶ **Confidential information:** Suppliers must protect confidential information, including the personal data of their employees and business relationships.

▶ **Transparency:** Suppliers must be transparent about their operations and their compliance with this Code of Conduct.

4. Implementation & Compliance

We will collaborate with our suppliers to uphold the guidelines and principles outlined in this Code of Conduct. Together, we will actively seek ways to enhance and further implement these standards throughout the entire supply chain.

From our suppliers, agents, distributors, and other business partners, we expect:

- ▶ **Integrity Policy:** Suppliers must implement and maintain their own integrity policies.
- ▶ **Compliance:** Suppliers must fully accept, implement, and adhere to this Code of Conduct.
- ▶ **Supply Chain Policy:** Suppliers must inform their partners within the supply chain about this Code of Conduct and ensure its implementation as far as their influence allows.
- ▶ **Training:** Suppliers must train their employees to comply with this Code of Conduct.
- ▶ **Audits:** Suppliers must conduct or arrange for periodic audits to verify compliance with this Code of Conduct.
- ▶ **Reporting Obligation:** Suppliers must inform Dulimex of any (suspected) violations of this Code of Conduct.
- ▶ **Sanctions:** Dulimex reserves the right to impose sanctions on suppliers who do not comply with this Code of Conduct, including terminating the partnership.

5. Final provisions

- ▶ This Code of Conduct is a living document and may be amended by Dulimex.
- ▶ The most current version of the Code of Conduct can be found at www.dulimex.nl, and we will communicate any updates to our stakeholders.
- ▶ Suppliers are expected to stay informed about the latest version of this Code of Conduct.

Questions regarding this Code of Conduct can be directed to Mr. E. te Pas via compliance@dulimex.nl.

Vaassen, January 1st, 2025

Dulimex B.V.
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Managing Director