



Valkenswaard, 19-12-2024

Anvil Industries B.V. Code of Conduct

This Code of Conduct is established by Anvil Industries and applies to all companies within the group, including: Anvil Industries B.V., BKL groep B.V., Contour Covering Technology B.V., Jansen Machining Technology B.V., Job Precision B.V., Machinefabriek de Valk B.V., Rols Machineonderdelen B.V., Slagman Precision B.V.. Hereafter referred to as 'Anvil Industries and its subsidiaries'.

This Code of Conduct ("Code") describes the principles Anvil Industries and its subsidiaries stand for and believes in. While it does not provide detailed rules for every situation, it serves as a guide for ethical and professional behavior in our daily work and interactions. This Code helps us make decisions that align with the best interests of all stakeholders connected to Anvil Industries and its subsidiaries.

Respecting People

Anvil Industries is committed to diversity and fostering a working environment built on mutual respect.

That's why at Anvil Industries and its subsidiaries we:

- Respect employees, value their diverse cultural identities, and fully acknowledge their individual contributions.
- Competitively reward employees for their performance and provide motivating working conditions.
- Stimulate the talents and strengths of employees while investing in their career development.
- Provide equal opportunities in recruitment, hiring, training, promotion, and compensation based on objective, non-discriminatory criteria.
- Do not tolerate any conduct that creates, encourage or permits an offensive, humiliating, hostile or intimidating work environment.
- Show zero tolerance for any form of discrimination, harassment, or other unethical treatment.
- Strictly prohibit the use of child labor in any part of our business or supply chain.




Respecting Our Planet

We carry out our business strategy with a commitment to sustainability across operations, products, our value chain, and corporate culture. Therefore, we:

- Ensure safe and healthy working conditions for our employees.
- Continuously improve our environmental performance by reducing harmful emissions.
- Strive to improve the energy efficiency of our products and reduce the environmental footprint of our operations.
- Promote the use of sustainable materials and assess opportunities for circularity in our production processes.
- Actively engage with the local and global communities in which we operate.

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Business and Personal Integrity

The reputation of Anvil Industries and its subsidiaries is shaped by the conduct of all employees, business partners, and stakeholders. Our reputation is the foundation for our past, present, and future success. To uphold integrity, we:

- Conduct business with excellence, commitment, and fair play, expecting the same from our partners.
- Avoid conflicts of interest between personal and professional relationships, ensuring that company opportunities are not used for personal gain.
- Exchange gifts or entertainment only of minimal value and maintain zero tolerance for bribery, corruption, and unethical behavior.
- Carefully protect our intellectual property and share confidential or company-sensitive information only when necessary.
- Use and protect company assets responsibly, ensuring they are used solely for legitimate business purposes.
- Respect the assets, data, and intellectual property of third parties, ensuring no involvement in exploitative practices such as forced labor or human trafficking.

Financial Accountability

Anvil Industries and its subsidiaries are dedicated to maintaining the highest levels of financial integrity and transparency in all its operations. This includes:

- **Transparency and Reporting:** Ensuring all financial transactions, records, and reports are accurate, complete, and compliant with applicable laws and regulations.
- **Anti-Fraud Measures:** Actively preventing fraud, embezzlement, and the misuse of company resources.
- **Tax Compliance:** Fully adhering to Dutch and EU tax laws, ensuring timely and accurate reporting to authorities.
- **Quality in Financial Practices:** Applying high standards in accounting, auditing, reporting, and financial disclosures.
- **Preventing Financial Misconduct:** Avoiding conflicts of interest, insider trading, or any form of financial malpractice.




Managing Professionally

In our dealings with stakeholders, we strive to promote honesty, accountability, and transparency. We:

- Uphold high-quality standards in governance, compliance, and reporting processes.
- Operate our business in accordance with good corporate governance principles.
- Strictly adhere to applicable laws, particularly regarding competition/antitrust, insider trading, and export compliance.
- Proactively prepare for new legislation, including regulations such as the Corporate Sustainability Reporting Directive (CSRD) and employee commute reporting laws.
- Maintain a zero-tolerance policy toward illegal or unethical business practices, including any involvement in child labor, forced labor, or human trafficking in our operations or supply chain.

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Support for Employees and Reporting

This Code is mandatory for all employees and guides our behavior. It may be updated periodically to align with evolving laws, regulations, and stakeholder expectations.

- Employees who report any (suspected) breaches of the Code in good faith will be protected from retaliation.
- Reports may include issues such as child labor, forced labor, discrimination, harassment, corruption, fraud, or environmental breaches.
- The Board of Management ensures that every report is investigated thoroughly and that appropriate actions are taken to address violations.
- For any reports, concerns, or complaints regarding the Code, employees and stakeholders can contact us confidentially via email or phone at the internally designated confidential advisor.

Our Commitments to the Supply Chain

To drive sustainability and ethical practices across the value chain, we engage closely with suppliers and business partners. This includes:

- Requesting data from suppliers regarding their CSR and CO2 performance to ensure alignment with our values.
- Prioritizing sustainable procurement practices and evaluating opportunities for circular materials and processes.
- Ensuring that suppliers adhere to similar principles of environmental responsibility, ethical labor practices, and financial transparency.

Continuous Improvement

Anvil Industries and its subsidiaries are committed to continuous improvement in all areas of our business operations, including sustainability and corporate responsibility. As part of this commitment, we actively work to align with the Science Based Targets initiative (SBTi) to reduce our carbon footprint and meet global climate goals. Additionally, we leverage platforms like EcoVadis to monitor, assess, and enhance our performance in sustainability and ethical business practices. By setting clear benchmarks and engaging with stakeholders, we aim to drive meaningful progress toward a more responsible and sustainable future. This includes:

- Regularly reviewing and updating our policies to stay ahead of changes in Dutch, EU, and international laws.
- Enhancing our CO2 reduction efforts by tracking emissions in line with the Greenhouse Gas (GHG) Protocol.
- Aligning our policies and operations with the United Nations' Sustainable Development Goals (SDGs), with a focus on fostering circularity and improving sustainability within our supply chain.



Acknowledgement

By signing below, I confirm that I have read, understood, and agree to adhere to the principles outlined in the Anvil Industries and its subsidiaries Code of Conduct.


Name: _____

Signature: _____

Date: _____

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