

SUPPLIER CODE OF CONDUCT

Version	Date	Evolution	Author
A	29 jul 2026	Original document	KVD
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1. General

1.1. Language

The original version of this document is made in Dutch, in compliance with local regulations. This translation in English is provided for the convenience of international communication.

1.2. Document control

Field	Reference
Policy owner	Compliance Manager
Executive sponsor	Managing Director
Approved by	Management Team
Effective date	29 jul 2026
Review cycle	Annually, and following material legal, business, or risk changes
Applies to	Suppliers, subcontractors, manufacturers, distributors, agents, consultants, labor providers, and their relevant sub-tier partners
Related documents	Sustainability Policy; Code of Conduct; HSE procedures; Privacy Policy; Speak-up Procedure

1.3. Summary

Acceptance of a purchase order, contract, onboarding request, or continued business with Nucomat constitutes a commitment to meet this Code where incorporated or otherwise accepted.

1.4. Purpose, scope, and flow-down

This Supplier Code sets minimum ethical, social, environmental, safety, quality, privacy, and security expectations for Nucomat's business partners. Suppliers must comply with applicable laws and permits and require equivalent standards from relevant sub-tier suppliers. Where standards differ, the higher standard should be followed unless prohibited by law.

Requirements are applied proportionately to the supplier's size, activities, location, risk, and leverage. This Code does not reduce contractual or legal obligations.

2. Supplier code of conduct requirements

2.1. Management system

- Assign accountable management, maintain policies and controls appropriate to the risks, and train relevant personnel.
- Identify legal and customer requirements; keep permits, licences, records, and evidence current.
- Assess risks, investigate incidents and complaints, correct root causes, and monitor effectiveness.
- Provide workers and external stakeholders with accessible grievance channels and prohibit retaliation.
- Notify Nucomat promptly of material breaches, investigations, incidents, or loss of required permits/certifications affecting Nucomat.

2.2. Human rights and labor

- No forced or compulsory labor, slavery, trafficking, coercion, restriction of movement, abusive prison labor, worker-paid recruitment fees, deposits, document retention, or deceptive recruitment.
- No child labor. Meet applicable minimum-age rules and never assign hazardous work to anyone under 18.
- Provide understandable written employment terms; lawful wages, benefits, deductions, working time, rest, leave, and social protection.
- Respect lawful freedom of association, worker representation, collective bargaining, and communication without retaliation.
- Prohibit discrimination, harassment, abuse, violence, and retaliation; support equal opportunity and reasonable accommodation.
- Use legitimate labor providers and verify that migrant, temporary, agency, and contract workers receive lawful and equitable treatment.

2.3. Health and safety

- Identify hazards and apply the hierarchy of controls; provide safe equipment, guarding, maintenance, instructions, training, supervision, and required PPE at no unlawful cost to workers.
- Maintain chemical inventories, labels, safety data sheets, exposure controls, and safe storage/handling.
- Provide clean sanitation, potable water, emergency exits, fire protection, first aid, incident reporting, and emergency plans/drills.
- Record and investigate injuries, illnesses, near misses, and dangerous occurrences; protect workers who report or stop unsafe work.
- Coordinate safety responsibilities with Nucomat before on-site work and comply with site and customer rules.

2.4. Environment and product stewardship

- Maintain environmental permits and controls; prevent unauthorised releases to air, water, and soil; report material spills or breaches promptly.
- Measure and reduce material energy use, greenhouse-gas emissions, water use, waste, hazardous substances, packaging, and pollution.
- Apply the waste hierarchy and use authorised transporters and treatment facilities; retain transfer and disposal evidence.
- Protect biodiversity and sensitive habitats; prevent unreasonable noise, light, runoff, and community nuisance.
- Support durable, repairable, reusable, recyclable, responsibly sourced, and lower-impact materials and products where feasible.
- Provide accurate environmental and product information. Claims must be specific, substantiated, and not misleading.

2.5. Business integrity

- Prohibit bribery, kickbacks, facilitation payments, fraud, extortion, embezzlement, money laundering, and improper advantages.
- Gifts and hospitality involving Nucomat personnel must be lawful, modest, infrequent, transparent, and never cash or cash equivalents.
- Disclose conflicts of interest involving Nucomat personnel, owners, agents, or decisions.
- Compete fairly; prohibit price fixing, bid rigging, market allocation, improper information exchange, and other anti-competitive conduct.
- Maintain accurate books, records, invoices, origin statements, test data, time records, and supporting documentation.

2.6. Trade compliance and responsible minerals/materials

Comply with applicable sanctions, export controls, customs, anti-boycott rules, origin/marketing rules, and forced-labor import prohibitions. On request, provide traceability for countries, facilities, smelters/refiners, materials, and sub-tier suppliers relevant to Nucomat products.

Exercise risk-based due diligence for conflict-affected and high-risk areas and for materials or regions associated with forced labor, serious human-rights abuse, corruption, or environmental harm. Do not knowingly supply prohibited goods or conceal origin.

2.7. Quality, safety, and change control

- Meet agreed specifications, regulatory requirements, quality plans, testing, traceability, and product-safety obligations.
- Do not substitute materials, components, sites, processes, or sub-suppliers without required prior approval.
- Notify Nucomat promptly of suspected defects, counterfeit parts, nonconforming product, safety risks, data falsification, or regulatory action.
- Preserve relevant records and cooperate with containment, investigation, recall, corrective action, and field remediation.

2.8. Privacy, confidentiality, and cybersecurity

- Process personal data lawfully, only for authorised purposes, with minimisation, retention, security, and data-subject rights controls.
- Enter required data-processing agreements before processing personal data for Nucomat and use approved international-transfer safeguards.
- Protect Nucomat/customer information and intellectual property; restrict access to authorised persons with a need to know.
- Maintain proportionate security controls, vulnerability/patch management, backups, access logging, incident response, and personnel awareness.
- Notify Nucomat without undue delay, and within the contractual deadline, of actual or suspected personal-data, confidentiality, or cybersecurity incidents.

2.9. Assessment, evidence, and cooperation

Nucomat may request questionnaires, policies, permits, certifications, traceability information, records, corrective-action evidence, independent assessments, or site access. Assessments will be proportionate, respect legitimate confidentiality, and may be performed by Nucomat, a customer where contractually authorised, or an independent assessor.

The supplier must not coach workers, falsify records, conceal sites or subcontractors, or retaliate against participants. Nucomat will protect confidential information and personal data as required.

2.10. Nonconformity, corrective action, and disengagement

Nonconformities in products or services delivered must be treated dilligently and adequately, according to their level of severity.

Severity	Illustrative response
Minor / isolated	Document finding; supplier corrects within an agreed period and supplies evidence.
Material / repeated	Formal corrective-action plan, root-cause analysis, milestones, enhanced monitoring, and management escalation.
Severe / imminent	Immediate containment; possible suspension of new orders, shipment, site access, or production pending verification.
Unremedied / concealed	Responsible disengagement or termination, considering impacts on affected workers and communities; authority/customer notification where required.

2.11. Reporting concerns

Supplier workers and stakeholders may report suspected breaches confidentially under the Nucomat Speak-up Procedure. Until the dedicated channel is activated, send a sealed letter marked “Strictly confidential - Speak-up” to Nucomat bv, Spieveldstraat 65, B-9160 Lokeren, Belgium. Retaliation is prohibited for reporting in good faith.

3. Acknowledgement

The supplier confirms that it has authority to accept this Code, will communicate applicable requirements internally and to relevant sub-tier suppliers, will disclose material nonconformities, and will cooperate in reasonable verification and remediation.

Name	Role	Signature	Date