

ARQUUS is a part of John Cockerill Group and follows the Supplier Code of Conduct adopted by John Cockerill Group. John Cockerill will include ARQUUS as well as the John Cockerill Group.

This Supplier Code of Conduct formalizes John Cockerill Group's desire to strengthen its requirements and expectations on Environmental, Social and Governance (ESG) issues, in particular on sustainable development and in terms of Health, Safety, Environment and Ethics with regard to its Suppliers.

Through this Code of Conduct, John Cockerill details its requirements and aims for best practices in responsible purchasing. John Cockerill's Purchasing function contributes to the creation of value within the Group and to the continuous improvement of its performance.

This Code of Conduct is part of the John Cockerill Group's ESG strategy. It applies to all John Cockerill's Industry, Environment and Defense Sectors entities and to all procurement and subcontracting activities.

John Cockerill seeks to select Suppliers who themselves ensure that their own Suppliers and subcontractors comply with the following principles, in addition to adhering to all applicable environmental, social, and tax laws and regulations.

Compliance with these requirements is a key criterion for John Cockerill in the selection and establishment of its business relationships.

In this context, the following chapters outline John Cockerill's requirements for its Suppliers.

1. Human rights, labor law and working conditions

John Cockerill requires its Suppliers to respect **human rights** as recognized by the Universal Declaration of Human Rights, international conventions, and all other applicable international, national, and local regulations.

John Cockerill expects its Suppliers to respect, wherever they operate, all applicable local legal provisions concerning **labor law**, and in particular those concerning legal working hours and the minimum wage.

John Cockerill has a **Health and Safety** policy and requires its Suppliers to meet standards equivalent to its own, and in particular to provide their employees with a safe and healthy working environment that complies with applicable health and safety requirements and to ensure that the impact of their activities on stakeholders is controlled.

This includes, but is not limited to, respecting and enforcing:

- The protection of human rights, The absence of harassment, abuse or complicity in human rights violations, Compliance with legal, regulatory and other applicable requirements relating to occupational health and safety,
- The provision of products and services that meet the health and safety criteria specified in contracts with John Cockerill.

John Cockerill will not enter into contractual relationships with Suppliers who are found to be in violation of regulations regarding forced or compulsory labor, child labor or minimum working age, discrimination in employment and occupation, or violence, or who are complicit in violations in these areas.

2. Environment

John Cockerill's Environmental Policy expects its Suppliers to control the impact of their activities and to comply with the environmental regulations applicable to them.

It is recommended that they draw inspiration from international best practices in these areas, in particular by setting up an environmental management system.

John Cockerill requires its Suppliers to:

- Take initiatives to promote greater environmental responsibility, including improving **energy efficiency** and reducing **environmental impacts**.
- Optimize their use of **natural resources**, water, and limit their impacts on **biodiversity** and water resources.
- Control **emissions** and **discharges** associated with their activities, including those related to the production and management of **waste**, in particular hazardous waste, and the implementation of all forms of reuse and recycling.
- Respect the regulations in force concerning products and access to markets, attach the greatest importance to the knowledge and control of the toxicological impacts of the products they use.
- Encourage the development and diffusion of environmentally friendly technologies.

3. Business Ethics

John Cockerill has made commitments to protect the integrity of its business. These principles are as follows:

Corruption and conflicts of interest

John Cockerill condemns all forms of corruption and prohibits situations of conflict of interest involving its employees and its Suppliers.

The maintenance of the John Cockerill Group's relations with its Suppliers is conditional on their refusal to engage in any act of corruption or money laundering, any situation of conflict of interest, or any other violation of the legal provisions applicable in the countries where they operate.

John Cockerill strictly applies the basic principles of Sapin 2 Law to the Group Companies. The rules of the OECD, Belgian law and any other applicable local laws are also applied.

With regard to gifts and invitations, the rule of transparency applies in all circumstances: gifts, benefits or invitations received or offered in the context of business relationships are reported to

management and, when they exceed normal business practices, are subject to authorization in accordance with the provisions in force in the John Cockerill Group. The suppliers are encouraged to refer to the Whistleblowing Policy of John Cockerill, in case of any incidence contrary to the Code of Conduct.

Compliance with competition rules

John Cockerill must comply with competition regulations and has the same requirement for its Suppliers.

The John Cockerill Group is committed to ensuring equal treatment among Suppliers and ensures that procurement decisions are based on an objective and comparative evaluation of Suppliers.

The criteria of price, quality, performance, delivery times, health, safety and the environment, and the suitability of the services offered to the Group's needs are the basis of all its purchasing decisions. In addition, the John Cockerill Group strictly complies with regulations prohibiting any agreement, concerted practice, or abuse of a dominant position in the market concerned, with respect to its Suppliers.

Respect for confidentiality and industrial property

John Cockerill makes respect for confidentiality and industrial property one of its priorities.

The information that Suppliers communicate to the Group is treated with due respect and used only for authorized purposes. John Cockerill expects its Suppliers to make the same commitments.

Control of export rules

John Cockerill intends to comply with all export regulations and prohibitions set forth by the Belgian and French regulatory authorities, European Union, the United States of America and any country from which the group may export to other countries.

Transparency and reporting

John Cockerill has obligations and commitments in terms of transparency and the publication of non-financial information.

The John Cockerill Group expects its Suppliers to follow this same practice in their contractual relations with John Cockerill and with their own stakeholders.

COMMITMENT OF SUPPLIERS AND SUBCONTRACTORS

In implementing the management of the relationship with Suppliers, the John Cockerill's Purchasing function may verify that the above principles and rules are taken into consideration and, if necessary, may take any appropriate measures following these verifications.

John Cockerill also expects its Suppliers and Subcontractors to make their best efforts to pass on equivalent provisions to their own value chains.

By adhering to this Code of Conduct, John Cockerill Group's Suppliers and Subcontractors undertake to support John Cockerill in respecting the principles mentioned and agree to be evaluated by John Cockerill or a third-party organization on their practices and the principles set out above.

In implementing the management of the relationship with Suppliers and Subcontractors, John Cockerill's Purchasing function may verify that the above principles and rules are taken into consideration and, if necessary, may take all appropriate measures following these verifications.

If you are a victim or witness of unethical behavior, such as discrimination of any kind, unfair treatment, harassment, fraud, corruption, or human rights violations, alert us via <https://johncockerill.com/en/group/a-compliant-and-ethical-group/>. If you have any questions about the Whistleblowing policy, you can also contact the following address: Support.ProcessusAlerte@arquus-defense.com.

* John Cockerill reserves the right to change this Code of Conduct in response to changes in laws, regulations and lessons learned from their application, as well as practices in the industries in which Suppliers or Sub-contractors operate.