PAUWELS TRANSFORMERS

Q&E

6.18.1. ETHICAL CODE & POLICY

PAUWELS TRANSFORMERS NV
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ETHICAL CODE & POLICY DECLARATION

1. Purpose and scope

The purpose of this document is to ensure that all individuals representing the company PAUWELS TRANSFORMERS NV, such as employees , managers and consultants, interact with each other, clients, and suppliers in an ethically responsible manner.

2. Responsibilities and procedures

2.1. Equal opportunities policy

PAUWELS TRANSFORMERS NV subscribes to a clear equal opportunity policy.
This is concretely outlined in the equal opportunities policy, which states that everyone, regardless of origin, gender, orientation, religion, etc., is treated with the same respect and has equal opportunities for career development within PAUWELS TRANSFORMERS NV.

2.2. Respectful attitude

PAUWELS TRANSFORMERS NV expects all employees to engage with others (colleagues, clients, suppliers, etc.) sincerely, honestly, professionally, and respectfully. Behavior by an employee or any other person that creates an intimidating, hurtful, or hostile work environment will not be tolerated. This includes harassment or inappropriate behavior. If you witness or are a victim of discrimination, inappropriate behavior, or harassment, you should report this immediately to the confidential advisor, who will handle the matter appropriately and in strict confidence.

2.3. Social media

You must never openly express a personal opinion (positive or negative) on a social media platform in the name of PAUWELS TRANSFORMERS NV. Only authorized employees are permitted to publicly represent the company.
In addition, you may not create any type of blog in the name of PAUWELS TRANSFORMERS NV unless you have received permission from the management. Social media is not the place to discuss proprietary, non-public, or confidential business information. Always consider confidentiality when sharing anything online. Never post or share content or comments on social media that are discriminatory, offensive, or inappropriate. Always be aware of the reality of social media usage: everything shared is permanent and has a global reach.

2.4. Safe and healthy workplace with respect for the environment

For PAUWELS TRANSFORMERS NV, the safety and health of its employees are the top priority. PAUWELS TRANSFORMERS NV is particularly committed to complying with applicable legal requirements regarding workplace health and safety, as well as environmental legislation. All reasonable precautions are taken to ensure that the workplace remains healthy and safe for everyone. Each employee must, in turn, ensure that his or her actions do not pose any risk to themselves or others and must alert his or her manager to any behavior, installations, or risks that may compromise the safety of his or her work environment, as well as any accidents or incidents of which he or she may become aware. Being under the influence of alcohol or drugs or improperly taking medication may impair an employee's
ability to perform efficiently and safely. The use of alcohol or drugs is not permitted at work. The use of medication during work hours, on company premises, or while driving company vehicles is only allowed to the extent that its use does not pose a risk to yourself or others.

2.5. Protection of company assets and compliance with personal data protection regulations.

The employees of PAUWELS TRANSFORMERS NV are obligated to contribute to the security and protection of the company assets against damage, theft, or embezzlement and must refrain from using them for personal purposes.

'Company assets' include not only tangible items such as buildings, installations, machinery, vehicles, equipment, computers, information systems or supplies, but also intangible items such as intellectual property (brands, logos, slogans, etc.) and know-how of PAUWELS TRANSFORMERS NV. The employees, managers and consultants of PAUWELS TRANSFORMERS are expected to apply the relevant standards in regards of protection of personal data and to respect the personal data collected in the context of their activities.

2.6. Conflicts of interest

A conflict of interest is any situation or arrangement in which personal activities or interests interfere with responsibilities towards PAUWELS TRANSFORMERS NV. Conflicts of interest, whether real or perceived, must always be avoided. Employees who find themselves involved in a potential or actual conflict of interest, or who witness one, are obligated to disclose the matter to management as soon as possible. Examples of potential conflicts of interest:

- Negotiating with a supplier where a family member works in a key decision-making role.
- Having a relationship with a supervisor or subordinate.

2.7. Competition and antitrust laws

PAUWELS TRANSFORMERS NV competes with its rivals based on its products, services, and prices. Competition and antitrust laws are designed to ensure a competitive free market that promotes business efficiency and innovation. PAUWELS TRANSFORMERS NV is committed to complying with all applicable competition and antitrust laws wherever it operates. PAUWELS TRANSFORMERS NV selects its suppliers based on customer requirements, independent business judgment and in accordance with the law. PAUWELS TRANSFORMERS NV does not exchange information with competitors about costs, pricing strategies (including credit terms, margins, or discounts), tenders, sales terms, supplier selection, potential acquisitions, market share or any other information exchange in violation of applicable competition or antitrust laws.

PAUWELS TRANSFORMERS NV does not make explicit or implicit agreements with competitors on prices or market strategy; nor any other agreements that contravene with applicable competition and antitrust laws. This includes formal agreements and gentlemen's agreements, oral agreements, tacit agreements and informal confidential discussions.

Employees acting as officers, directors, or committee members of a professional association or attending meetings of professional associations where competitors may be present, should refrain from conversations or actions that may violate applicable competition and antitrust laws or involve the disclosure of confidential information.

2.8. Anti-corruption, bribery and fraud

PAUWELS TRANSFORMERS NV takes a clear stance against bribery, corruption, and fraud!

What is bribery, corruption, and/or fraud? Promising or giving someone a financial benefit (bribe, gift, etc.) or other advantage (directly or through a third party) to influence and induce that person to engage in unauthorized activity.

Employees of PAUWELS TRANSFORMERS NV commit to refusing any form of bribery, or gifts from clients intended to influence decisions. Any employee facing such a situation must report it immediately to their direct supervisor or quality manager. Business gifts, hospitality, and entertainment

Small business gifts of minimal value or invitations to a business lunch or meeting to promote business relationships are generally acceptable. It is important that gifts, hospitality, and entertainment should never exceed the limits of what is customary in normal business interactions. The basic rule is that the

independence, impartiality, and integrity of both us and our business partners must never be compromised. In case of doubt, always consult your direct supervisor or management.

2.9. Money laundering

PAUWELS TRANSFORMERS NV takes a clear stance against money laundering. Employees of PAUWELS TRANSFORMERS NV commit to rejecting any form of corrupt financial practices. Any employee confronted with such practices must report it immediately to his/her direct supervisor or quality manager.

2.10. Whistleblower Policy

PAUWELS TRANSFORMERS encourages employees, managers and consultants to report in good faith any suspected misconduct, violations of laws or regulations, or breaches of this Code.
Reports can be made through the confidential advisor and will be handled confidentially and impartially.
PAUWELS TRANSFORMERS prohibits any form of retaliation against individuals who raise concerns in good faith. All reports will be reviewed promptly, and appropriate corrective actions will be taken where necessary.

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CHIEF EXECUTIVE OFFICER: Koen Van Peteghem	

CONFIGURATION MANAGEMENT - VERSION MANAGEMENT

Version	*Version*	*Version*
1	Ref 6.18.1 Original version.	20/02/2026