



Policy

filtration

Business Ethics Policy

Enschede, the Netherlands, 18 October 2022

Management Approval and Responsibility

The Management Board of NX Filtration N.V. (**NX**) adopted the following policy on 18 October 2022. The Management Board is responsible for overseeing business ethics issues. Given the current size of NX, the Management Board is furthermore responsible for the development and, together with the HR department, implementation of this Business Ethics Policy, including a fit for purpose Ethics & Compliance Programme

Introduction

This Business Ethics Policy reflects the commitment of NX and its subsidiaries to conduct their business in accordance with applicable laws, rules and regulations, as well as the various codes, policies and other standards that NX has adopted. These are all accessible through NX's SharePoint (Teamsite - Introductiepagina (sharepoint.com)) and may also be obtained from the secretary to the Management Board.

The objective of this Business Ethics Policy is to:

- outline the expectations that NX and its subsidiaries have of its employees and their behaviour relating to ethics & compliance and corresponding laws and regulations;
- ensure that employees understand the importance of conducting business in an ethical way and respecting the principles that are set out in the Code of Conduct, the Human Rights Policy and the Customer & Supplier Screening Policy (Sanctions);
- highlight the role of managers within the NX organisation in leading ethics & compliance efforts by creating a business environment in which employees understand their duties and feel safe to speak up about issues relating to ethics & compliance without fear of retaliation; and
- detail the requirements for the Ethics & Compliance programme and the minimum standards that apply thereto.

Applicable Laws, Rules And Regulations

NX operates in a regulated environment and in many different countries and regions, each with its own set of laws, rules and regulations. It is not possible for all NX managers to know and understand every law, rule and regulation to which NX may be subject. It is, however, important for all managers to have an understanding of the laws, rules and regulations that apply to the businesses for which the relevant manager is responsible and conduct a risk-based approach to ensuring that the employees of all NX companies comply with such laws, rules and regulations. If a manager is uncertain about which laws, rules or regulations apply or about their terms, then he or she should consult the Ethics & Compliance Officer. The Ethics & Compliance Officer is Marc Lutikhuis, member of the Management Board.

Roles & Responsibilities

The Management Board is responsible for the development and, together with the HR department, implementation of this Business Ethics Policy and a fit for purpose Ethics & Compliance Programme. The Ethics & Compliance programme facilitates compliance with the above principles and allow for the effective management, monitoring and reporting of ethics & compliance risks. The Ethics & Compliance Officer will lead the Ethics & Compliance function and lead the implementation of this Business Ethics Policy and the Ethics & Compliance Programme. The Ethics & Compliance Officer will report to the Management Board on the design and implementation of the Ethics & Compliance Programme.

Fit for purpose Ethics & Compliance Programme (including education & training)

Our Ethics & Compliance Programme is built on a risk analysis. The Ethics & Compliance Programme includes (at least) the following minimum elements:

- a clearly defined ethics & compliance structure;
- ongoing identification and monitoring of applicable laws, regulations and key ethics & compliance risks relating to the business activities;
- clear policies and procedures based on the Code of Conduct and NX's minimum standards supplemented with business specific or additional local requirements;

- a training and awareness programme for employees focused on the key ethics & compliance risk areas that have been identified. In October 2022, we have selected various managers to participate in the set-up of a training programme, in close consultation with the Management Board;
- a process setting out how to identify, assess and respond to ethics & compliance risks, incidents and issues (including speak up matters). The Ethics and Compliance Officer should be included in the escalation process for all material ethics & compliance issues, incidents and investigations;
- periodic reporting on the progress and status of the Ethics & Compliance Programme (including any ethics & compliance issues, incidents and investigations); and
- a plan to monitor, review and improve the Ethics & Compliance Programme on an ongoing basis (including monitoring the regulatory and business environments and developing appropriate responses to changes in both). A monitoring plan should include activities to assess whether key ethics & compliance controls are operating effectively. It is an expectation that accurate records and documentation relating to the Ethics & Compliance Programme and related ethics & compliance initiatives be maintained.

Topic Areas

The Ethics & Compliance Programme will furthermore at least cover the following areas:

- The Code of Conduct;
- Anti-Bribery and Anti-Corruption rules laid down therein;
- The Human Rights Policy;
- The Insider Trading Policy;
- The Whistleblower Policy (including speak-up);
- Sanctions and Export Controls; and
- Anti-Money Laundering and Counter Financing of Terrorism.

Policy Scope And Governance

This Business Ethics Policy applies to all subsidiaries, directors, officers and employees of NX. Breaches of this Business Ethics Policy may result in disciplinary action up to, and including dismissal. The Ethics & Compliance Officer serves as the point of contact for this Business Ethics Policy and will monitor the design, implementation, adequacy and effectiveness of the Ethics & Compliance Programme, as necessary. The Management Board may also require other independent assurance on the effectiveness of ethics & compliance. This Business Ethics Policy will be reviewed on an annual basis by NX Ethics & Compliance.

Speak up

If you believe that there has been a breach of this Business Ethics Policy (or intention to do so), we encourage you to speak up. You may, at any time, contact your manager, HR, the Ethics & Compliance Officer, or our confidential counselor Mariël Elshof (@: m.elshof@nxfiltration.com) to seek advice, guidance or to formally raise a concern. If you do not feel comfortable raising a concern internally, you can contact the independent, external counselor Annemieke Wolff (@:annemieke@wolffconnect.nl).