

SUPPLIER CODE OF CONDUCT

Introduction

At BDO, we are committed to ethical, lawful, and sustainable business and seek suppliers who share these values. Hereto, BDO has drawn up a Supplier Code of Conduct (hereinafter referred to as “Code”), which sets out the minimum standards we expect of any supplier doing business with us. However, more than compliance, it’s an invitation to co-create a responsible, resilient, and sustainable future together.

Scope and Application

Applicability

This Code applies to all suppliers that provide goods or services to BDO, including our subsidiaries, affiliates, and agents (hereinafter referred to as “BDO”).

Recognising that there are different legal and cultural environments in which suppliers operate, this Code outlines the core requirements to which suppliers must comply in order to do business with BDO. This Code shall apply to govern the relationship between BDO and its suppliers in respect of the matters set out herein irrespective of any entire agreement or equivalent clause otherwise included in a supplier agreement.

Expectations for suppliers

We expect our suppliers to uphold the principles outlined in this Code and to advocate for these standards within their own supply chains. Suppliers are responsible for ensuring that their subcontractors and third-party partners adhere to similar standards, thereby extending ethical and sustainable practices throughout the broader supply network.

Business conduct

Adherence to laws and regulations

BDO requires all suppliers to conduct their business in full compliance with all applicable laws and regulations of the countries and regions in which they operate. This includes, but is not limited to, regulations related to labour, health and safety, environmental protection, and anti-corruption. Suppliers must maintain all necessary permits, licenses, and registrations to conduct their business lawfully.

Ethical behaviour

BDO takes very seriously the need to ensure that business is carried out in an ethical manner. Suppliers are expected to operate with the highest level of integrity.

Suppliers should be compliant with all laws, regulations and best practice relating to anti-corruption, including a prohibition on extortion, bribery, facilitation payments or other improper inducements, and should take appropriate steps to ensure that their suppliers are also compliant. This includes having measures for the prevention of unethical business practices, including, but not limited to, human rights abuses, social dumping, unfair competition practices, money laundering, fraud, bribery, corruption, and other improper payments, benefits gifts or other inducements. Moreover, suppliers are required to act in a way that mitigates any conflict of interest which may occur when working with BDO.

Confidentiality and data protection

Suppliers are required to keep strictly confidential and securely manage any information and personal data obtained during their business with BDO, in accordance with applicable data protection laws and data

processing agreements. This includes ensuring that adequate safeguards are in place to prevent unauthorized access, disclosure, alteration, or destruction of information, both during the performance and after the termination of the work.

Human and labour rights

Suppliers are encouraged to put in place due diligence processes to identify and manage any actual or potential adverse impacts on individuals, including on their own employees, those of their suppliers, or affected communities.

Suppliers are encouraged to put in place processes to ensure respect of the [Universal Declaration of Human Rights](#) and shall comply with the International Labour Organisation (ILO).

Fair Treatment and Equal Opportunity

Suppliers shall provide equal employment opportunity to all applicants and employees regardless of race, colour, sex, sexual orientation, gender identity, religion, creed, national or ethnic origin, age, disability, citizenship status, veteran status, marital status or any other protected class or characteristic under applicable law.

Wages and Hours

Suppliers shall ensure that working hours, wages and overtime pay in compliance with all applicable laws with the purpose and intention of the relevant law. Workers shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is greater. While it is understood that overtime may be required, suppliers shall carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions.

Freedom of Association

Suppliers shall allow workers who wish to lawfully and peacefully associate, organise or bargain collectively, without interference, discrimination, retaliation or harassment.

Forced and Child Labour

Suppliers will not use child, slave, forced or obligatory labour and shall never engage in, or support human trafficking. Suppliers must comply with all applicable laws and reporting requirements concerning slavery, human trafficking, the minimum age of employees and all other applicable child labour laws.

Health and Safety

Suppliers will provide a clean, safe and healthy working environment to protect the occupational safety of all employees and shall comply with all applicable laws and regulations regarding working conditions. Suppliers must ensure they have the right measures and appropriate health and safety training to prevent accidents and injury at work.

Discipline

Suppliers should not subject their employees to any form of physical abuse or discipline, or the threat of sexual or other harassment and verbal abuse or other forms of intimidation. Suppliers should ensure that their disciplinary and grievance procedures as well as any whistleblowing procedures are clearly communicated to all employees.

Environment and climate

BDO takes its responsibility for protecting the environment seriously and is committed to reducing its own environmental impact by halving its CO₂ emissions by 2030 and reaching net-zero greenhouse gas emissions across the value chain by 2050. Suppliers are expected to have a precautionary “better safe than sorry” approach towards pollution, environmental risks, and other environmental

and climate challenges. Suppliers shall make continuous efforts for greater environmental responsibility. In this sense, we expect suppliers to take reasonable steps to monitor and aim at minimizing negative environmental impact from their business activities.

Suppliers must at all times be compliant with local environmental laws and regulations, including those relating to waste disposal, pollution, discharges and air emissions.

We believe in the power of collaboration to achieve our climate ambitions. BDO can only achieve its carbon footprint reduction target together with its suppliers. Suppliers are therefore expected to work with us to identify and implement practices that could lead to better environmental outcomes. Suppliers are required to know their current energy sources and identify possibilities to convert to renewable energy sources. Suppliers are encouraged to measure their carbon footprint and develop measures to reduce their emissions.

Suppliers are encouraged to set science-based targets for their material environmental topics.

Suppliers are encouraged to register with a globally recognised external organisation (EcoVadis or equivalent).

Suppliers are encouraged to publicly report on environmental actions.

BDO asks its suppliers to make efforts for reducing their use of non-renewable and non-recyclable resources and by 31 December 2030 having reduced their aggregate Scope 1,2 and 3 Emissions Green House Gases by no less than 50% from the Supplier's baseline.

Monitoring and Compliance

BDO is committed to maintaining the highest standards of compliance within its supply chain.

Continuous Improvement

Monitoring or documenting of compliance is the responsibility of the supplier. However, we view compliance with this Code as an ongoing process and encourage our suppliers to continually seek ways to improve their adherence. Open communication about challenges, barriers, and opportunities for improvement is encouraged, as it enables collaborative solutions and fosters a stronger partnership. The transition to a sustainable business model is a shared effort so let's grow together.

Reporting and Communication

Suppliers should report any instances of non-compliance with this code, whether observed within their own operations or within their supply chain. Suppliers are also encouraged to maintain a whistleblowing mechanism to facilitate reporting by their employees.

BDO provides several channels through which non-compliance reports can be made:

- Our whistleblowing platform:
<https://bdobelgium.whistlelink.com/>
- Our Procurement department:
procurement@bdo.be

Audits and Assessments

To ensure adherence to this Code, we reserve the right to conduct regular audits and assessments of our suppliers' practices. These may be conducted by BDO or through independent third-party auditors. The costs of the audit is covered by BDO. However, suppliers are expected to assist by participating in follow-up meetings, audits, inspections, and by presenting relevant documentation within a reasonable time.

Supplier Self-Assessments

We reserve the right to require suppliers to participate in self-assessments of their compliance with this code and to report the findings to BDO. These self-assessments help identify areas of improvement and ensure



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continuous compliance with our ethical, legal, and operational standards.

SME suppliers are not required to provide more ESG-related information than what is foreseen in the Voluntary SME standard.¹

Handling of Violations

Non-compliance may lead to BDO voiding or terminating a supplier contract.

BDO commits to prioritize working together with its suppliers on remediation and corrective action. We commit to take a responsible approach towards contract termination. Should BDO wish to disengage from its suppliers because of a potential or already-occurred adverse impact, BDO will do so responsibly and as a last resort where (i) attempts at preventing or

mitigating adverse human rights impacts have failed, (ii) the adverse impact(s) is irremediable, (iii) there is no reasonable prospect of change, or (iv) severe adverse impacts or risks are identified and the entity causing the impact fails to take immediate action to prevent or mitigate them.

SIGNED for and on behalf:

Company name:

Name:

Title:

Date:

¹ [Commission presents voluntary sustainability reporting standard to ease burden on SMEs - European Commission](#)