

# Code of Conduct



Stronger together

## Message from the CEO

Dear colleagues,

The BMT Code of Conduct and Business Ethics Policy (the "Code") establishes the core principles and policies that guide all of us in how we conduct ourselves as a company and as individuals representing BMT. Every action we undertake reflects on BMT, our values, and our character. BMT is committed to employing the highest ethical standards wherever we conduct business throughout the world, while achieving operational excellence and delivering the highest quality products in the most competitive global markets.

At our core, we are a family owned business, entrepreneurial in BMT, motivated to be the best at what we do, achieving continuous profitable growth, while being tasked with earning a fair return for our shareholders. In doing so, we must use our company's assets wisely and we must deliver on our promises to our customers, our shareholders, and our people. These are the principals that guide our conduct and decisions.

This Code is your guide for ensuring that BMT conducts business with integrity, consistent with sound business practices, so as to foster trust with our fellow employees, commercial partners, shareholders and government authorities. Our conduct impacts our reputation, public confidence in our business, and our financial strength.

Please read the Code carefully and spend some time thinking about your commitment to do the right thing every day. BMT has earned an excellent reputation for how we do business. It is our responsibility as employees

of BMT to preserve that reputation through our integrity, honesty and respect for others. If you see someone violating these core principals, you should report them to your manager or utilize the BMT's whistleblower platform.

We hope that this Code will provide you with enough information concerning how to conduct yourself when performing your duties on behalf of BMT. If not, and you have any questions; please feel free to reach out to your Site General Manager, or Human Resources director.

Sincerely,  
JC Seynaeve  
Chairman



Jean-Christophe Seynaeve  
CEO of BMT International NV

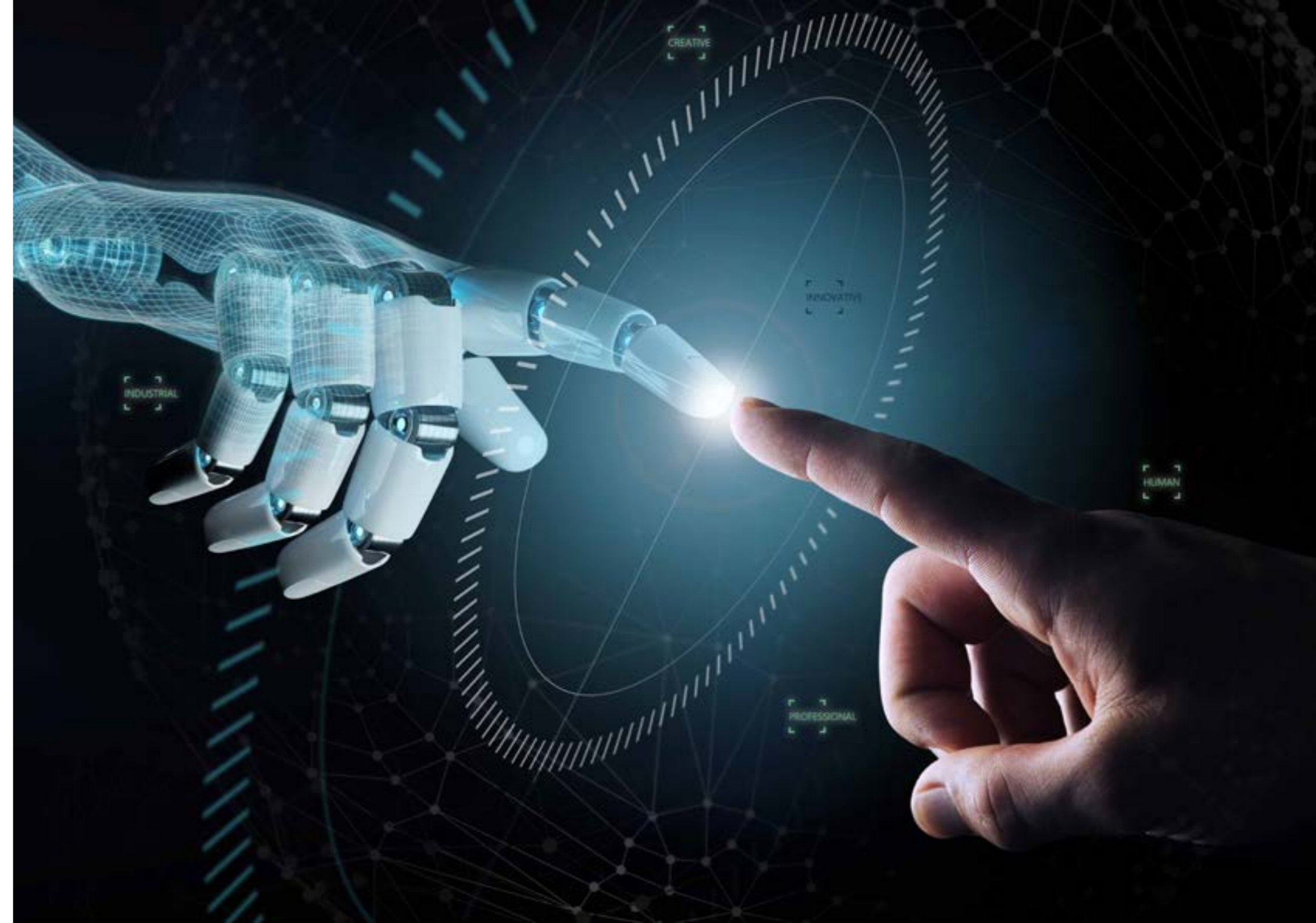




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- A. \*As used in this Code, the terms “Company” and “BMT” include BMT, its subsidiaries, divisions, and business units. The term “employees” includes all Company Directors, officers, and full-time, part-time, and temporary employees. A complete list of BMT Group companies can be found here (add live link).
- B. \*BMT preserves the right to change and modify this Code of Conduct at any time, and to adapt it reasonably to new circumstances and the evolution of laws, rules and regulations. You will be informed of any change to the Code.

# THE BMT FAMILY: OUR DNA



## **Above all doers**

Make things happen by mixing a healthy dose of good old common sense with the newest insights.



## **It's all about being creative**

Let's call us real entrepreneurs.



## **Proudly obsessed**

We may be lenient about some things but there is not one micron of leeway when it comes to the quality of our service and products.



## **Open to everything**

We are a human, but professional industrial holding. Open to everything (the world, you & your ideas),



## **We boldly go where no one has ever gone before**

It is about being the very best at what we do. Everywhere we do it.

## **Did you know?**

Micro is the BMT Group mascot. He represents all the different facets of the BMT Group DNA. These 5 characteristics are represented in all divisions across the BMT Group.

# 1.

## Purpose and applicability

Our Code is a roadmap that shows our values in action, particularly in areas with key ethical or legal considerations. The Code is what we stand for and what we expect from you. All employees have a responsibility to inform themselves about the rules and policies relevant to their work.

It can also be used as the basis for setting expectations with business partners, consultants and third parties. We want to work with individuals and companies whose actions align with our Code and values.

Our Code is intended to help guide you in making good decisions on the job every day, help you understand what's expected of you, and can be used as a reference guide, whenever you need guidance in a particular area.

Additional guidance can be found in BMT's policies, resources, and compliance programs. They are meant to supplement the Code and provide additional direction and details.

Our culture is built on good decisions made through open and honest discussion with others. We have many resources available to help you when facing an ethical dilemma, and you should always feel encouraged to approach your manager or an executive team member with any concern you may have.

# Guiding principles

The BMT Code describes seven guiding principles that you should use when confronted with legal or ethical questions in the course of your work:

These principles encourage responsible conduct, integrity, and sound business practices, but are often challenging to apply in the business context. The Code shows our values in action, particularly in areas with key ethical or legal considerations. The Code is what we stand for and what we expect from you. While the Code provides practical guidance for many situations, it is not a substitute for common sense and good judgment. That is why we count on everyone to use common sense, good judgment, and ask questions whenever there is doubt about what to do.

For example, you can ask yourself these questions, which can help you make good, ethical decisions consistent with the principles set forth in this Code:

- Do I have all the relevant facts and have I reviewed them carefully?
- Have I considered all the issues?
- Have I thought carefully about my options?
- Are my actions and decisions consistent with the Code?
- Are my actions and decisions legal and/or ethical?
- Have I used the resources available to me?
- Would I be embarrassed to read about it in the media?
- Could it harm people or the environment?
- Could it damage BMT Group's global reputation?
- Have I considered the consequences of my choices?



# Waivers

Waivers of the Code may be requested in rare circumstances when a strict application of the Code may result in a significant hardship. For senior financial and executive officers or directors, any waiver or amendment must be approved by the Audit Committee of the Board of Directors. For all other employees, any waiver of this Code must be approved by the BMT Compliance Officer in accordance with procedures.

**Q:**

Our facility is located in Croatia, and it is common to have family members work together on the manufacturing floor. It actually promotes comradery. But I see that Hiring family members can be considered a conflict. Does that mean we can no longer hire family members?

**:A**

No. In that case, your Site General Manager would petition the Division CEO for a waiver of the BMT Code of Conduct to allow you to hire a family member, provided that all parties disclose their familial relationship and avoid conflicts.

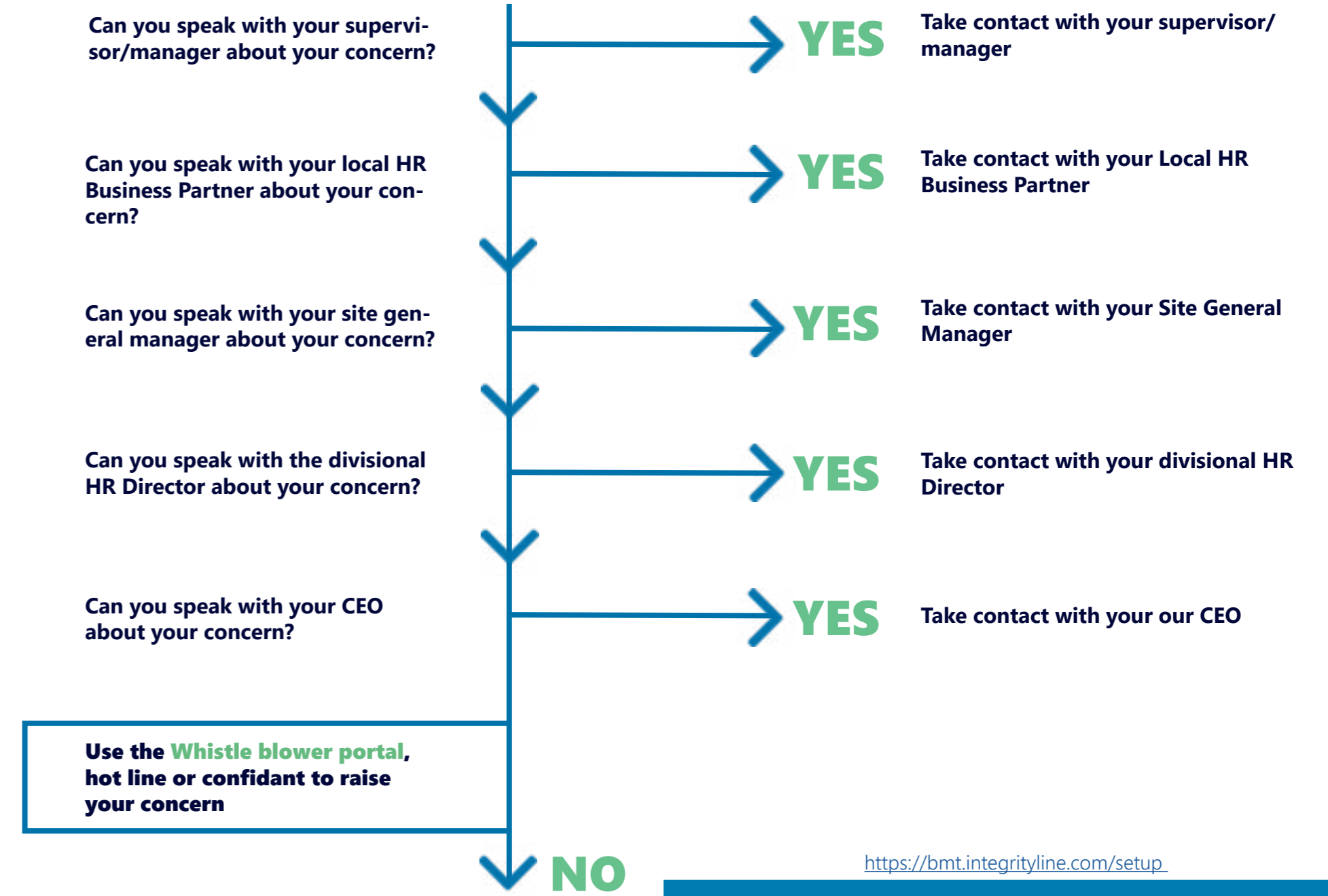
# Reporting and Investigating Suspected Violations of the Code

Speak Up! BMT Integrity Line. BMT encourages employees to make reports of suspected instances of sch improper conduct. If you believe that someone associated with BMT may violate or has violated this Code, applicable laws or regulations, or BMT policies, we want you to bring your concerns to your supervisor or manager.

BMT encourages you to always bring your concerns to your immediate supervisor or manager. However, if you are not comfortable reporting a concern to your immediate supervisor or manager, or you believe your supervisor or manager has not adequately addressed the issue, you should escalate it via normal company protocol:

## Note

In a few jurisdictions, we may not be able to accept anonymous reports due to legal restrictions. If there are limitations that exist in your location, our Integrity Line will handle your compliant in compliance with the requirements of local laws.





# Investigations

A magnifying glass with a black handle and a silver rim, positioned on the left side of the slide, partially overlapping the white text box.

Every incident report made in good faith will be handled promptly, discreetly, and professionally, and BMT will strive to maintain the confidential nature of your submission.

You do not need to collect evidence or investigate the matter, but we may ask you for further details so that we can investigate your concern. This process is set forth in more detail in the Company's Whistleblower Policy: <https://bmt.integrityline.com/setup>.

## **Our Investigation Process**

- Assign investigation team: Individuals with the right knowledge, objectivity and discretion.
- Conduct investigation: Determine facts through interviews and/or document reviews.
- Corrective action: Recommend corrective actions to appropriate managers for implementation (if necessary).
- Feedback: Provide general feedback to the person who raised the concern (if appropriate).

# Disciplinary actions

A wooden gavel with a dark handle and a light-colored head, positioned on the right side of the slide, partially overlapping the white text box.

Violations of laws, regulations, this Code, or our policies and procedures can have severe consequences for you and for BMT.

If we determine as a result of our investigation that any employee has violated applicable laws, regulations, this Code, or our policies and procedures, or is found to have authorized, directed, covered-up, or in any way participated in such violations, they will be subject to disciplinary action, which may include dismissal or termination, and civil and/or criminal liability.

# Prohibition against retaliation

We support and encourage our employees to report concerns. We will not tolerate retaliation against you or any person who raises an ethics or compliance concern in good-faith and through proper channels. Individuals who raise concerns or who help us resolve reported matters will be protected against retaliation. If you believe you or anyone else has been retaliated against for speaking up or raising a concern, you should submit a separate report. However, anyone who is found to have misused the Whistleblower platform to spread falsehoods, threaten others, or damage another's reputation will be subject to disciplinary action.



**2** ●

**We strive to  
follow the law**





We should always comply with the laws and regulations of each of the countries where we do business, and always strive to conduct business honestly, fairly and transparently.

When travelling or working internationally, it is important to become familiar with other countries' laws, regulations, and commercial practices, and to comply with them, avoiding not only actual misconduct but also the appearance of impropriety.

When working with existing or potential government customers, it is critical that we abide by the various laws, regulations and procedures that apply to government contract work.

BMT Aerospace often works on US Government Contracts, and is required to comply with procurement regulations (commonly referred to as the FAR or DFARS for military programs) which are flowed down to BMT Aerospace by their customers – often large defense contractors. These regulations impose numerous legal and regulatory obligations on BMT Aerospace, and it is critical that BMT Aerospace comply with these regulations whenever it accepts such a contract or provides products to the US Government.

Whenever BMT is precluded from doing something directly, you may not try to circumvent that prohibition by assisting or facilitating a third party to engage in that same conduct on behalf of BMT.

Violations of law can result in a loss of export licenses, suspension and debarment, as well as civil or criminal penalties, for BMT and/or its officers, directors, and/or you, and should be avoided whenever possible.

If you have any questions about a government contract or subcontract, international law, or regulation, contact your manager or the Legal Department before taking any action.



**3.**

**We comply with  
international laws  
and regulations**



# Improper payments, gratuities, gifts, and hospitality

BMT complies with applicable governing laws that prohibit the offering, receipt or soliciting of gratuities, gifts and kickbacks in order to receive favorable treatment, and has adopted an Anti-Corruption Compliance Policy, a copy of which can be found [here](#).

## Improper payments (anti-bribery and anti-corruption)

a) BMT does not tolerate any form of corruption (including bribes, kickbacks or other improper payments), regardless of local practice or perceived customs. They harm not only our company and its reputation, but also the communities where we do business.

b) We do not tolerate corrupt practices in our business anywhere in the world. We are committed to complying with anti-corruption laws wherever we do business. Examples of laws that prohibit a company from providing, attempting to provide or offering to provide a bribe, kickback or favorable treatment from government officials (The term "government official" can also include the employees of State-Owned Enterprises, other state-controlled entities. ) for the purpose of obtaining any sort of unfair advantage from a customer or supplier include the Belgium Public Bribery Law, the UN Convention Against Corruption, Foreign Corrupt Practices Act (FCPA) in the United States, and the UK Bribery Act in England. These laws typically impose severe civil and criminal penalties for both the company and the individuals(s) involved in such activity.

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## Gratuities, gifts and hospitality expenses

Offering and accepting business gifts, favors, and entertainment (includes events that both you and your guests attend, such as meals, sporting events, or concerts) is a customary business courtesy. Doing so can promote goodwill and enhance business relationships. BMT allows for the exchange of gifts of nominal value as long as the exchange does not violate the laws or regulations of the applicable government in which you are operating, or the policies of another organization, or other commercial entity. Gifts, favors and entertainment should never affect, or appear to affect, your impartial business decision-making. Nor should these things be offered or received in exchange for preferential treatment in any business dealing.

Always avoid gifts, favors or entertainment that could appear to be bribes, raise questions about conflicts of interest, or damage our reputation.

Records of any gifts, entertainment, and hospitality expenses should be recorded in accordance with local procedures, and should in all instances identify the attendee's or recipient's name, title, organization, business purpose, and date.

**Business gifts, favors and entertainment are generally acceptable if they meet all of the following criteria:**

- ✓ they are not requested or solicited
  - ✓ are nominal in value if given by a business partner for which you have purchasing or relationship management duties
  - ✓ are otherwise modest in value and not lavish
  - ✓ are infrequently given or received
  - ✓ are not cash or cash equivalents
  - ✓ hosted in a setting that is appropriate for business
  - ✓ do not create an obligation on the recipient
  - ✓ are not likely to inappropriately influence their business decision
  - ✓ would not reflect negatively on our company if disclosed to the public
-

## Reporting Kickbacks or Bribes.

If you find yourself in a situation where you believe you have been offered a kickback or bribe, or where you believe that an employee of BMT, a government official, or a customer may be indicating a desire to receive one, you should refuse the offer, and/or immediately report the incident to your direct manager, or to any of the individuals listed in above in Section I.D or through BMT's Whistleblower Platform at: <https://www.bmt.integrityline.com>

## No facilitation payments

BMT does not authorize facilitation payments, i.e. small payments to government officials to expedite or secure a non-discretionary routine governmental action, even if only ministerial or clerical duties. For example, you may not make a small payment or gift to a customs clerk – even if such facilitation payments are commonly paid in the local country - to avoid holding up our goods from clearing customs or obtaining a permit to operate.



# Antitrust, Sales Practices

1) Antitrust and competition laws prohibit agreements that eliminate or discourage competition. BMT is committed to fair and competitive sales practices, and we aim to outperform our competitors fairly and honestly, and to uphold all applicable antitrust laws.

2) Do not engage in practices that would unfairly limit trade or exclude competitors from the marketplace. You are not allowed to communicate formally or informally with competitors to fix or control prices, structure or manipulate bids to direct a contract to a certain competitor or reseller (bid-rigging), allocate markets or customers, boycott customers or suppliers, or limit the sale of products.

3) Use caution when attending trade association meetings, sharing information, or benchmarking.

4) You must report any attempts to circumvent these prohibitions – whether by a BMT employee or a third party.



# Trade Compliance (Exports, Imports and Sanctions)



**1.** We are a global company doing business around the world and committed to complying with applicable laws that govern international trade, and regulate the movement of products, technology, software and technical information across national borders.

**2.** Export Controls. The United States and many other countries, including the European Union member states where BMT operates, maintain laws that govern the export of goods, technology, and **services**(<sup>(\*)</sup>). Export laws are often complicated and change frequently, sometimes on a daily basis. For that reason, and to provide guidance, BMT has adopted an Export Control Policy, which can be found here, and many BMT companies have procedures in place that allow you to comply

with applicable local and international trade rules.

**3.** Often, the export of goods, technology, or services requires a license, as well as the payment of duties and taxes, and the filing of documentation before they can be exported. Therefore, it is important that prior to exporting(<sup>(\*\*)</sup>) or re-exporting goods, technology, or services, you first determine whether such activity is subject to any of these export control laws, and in particular whether it requires an export license from a government agency.

**4.** Restricted Countries and Parties. The United States and many other countries, including the EU member countries, also maintain laws that restrict BMT's dealings with certain countries, entities, and individuals

referred to as "Restricted Countries" or "Restricted Persons". You should never engage directly or indirectly in business with "Restricted Persons" or "Restricted Countries", or with citizens of "Restricted Countries" without first contacting the Legal Department. The list of sanctioned countries and restrictions is subject to frequent change.

**5.** Third Party Screening. Prior to entering into relationships with new customers, suppliers, and third parties, BMT requires that such parties are screened through "Visual Compliance," a third-party database, to confirm that we are not doing business with Restricted Parties.

**6.** Violating trade control laws and regulations can result in

serious penalties, including fines, revocation of exporting privileges, delayed shipments or loss of import and export privileges, and bad publicity for BMT, or even imprisonment for implicated employees. For questions on this section, consult the Legal Department.

(<sup>(\*)</sup>) THIS MEANS YOU SHOULD:

- Know and follow the trade restrictions that apply where you do business. These can be complex, as rules vary by location and may change in response to world events.
- Investigate export license requirements before exporting a product or sharing technical information or software across national borders.
- Support and apply our due diligence processes for third parties and business partners, as we may be prohibited from dealing with parties that are subject to sanctions.
- Notify the Legal and Compliance Department if you receive any requests from customers, suppliers or others to participate in a boycott against individuals,

companies or countries.

If you have questions, get support from your Legal & Compliance Department.

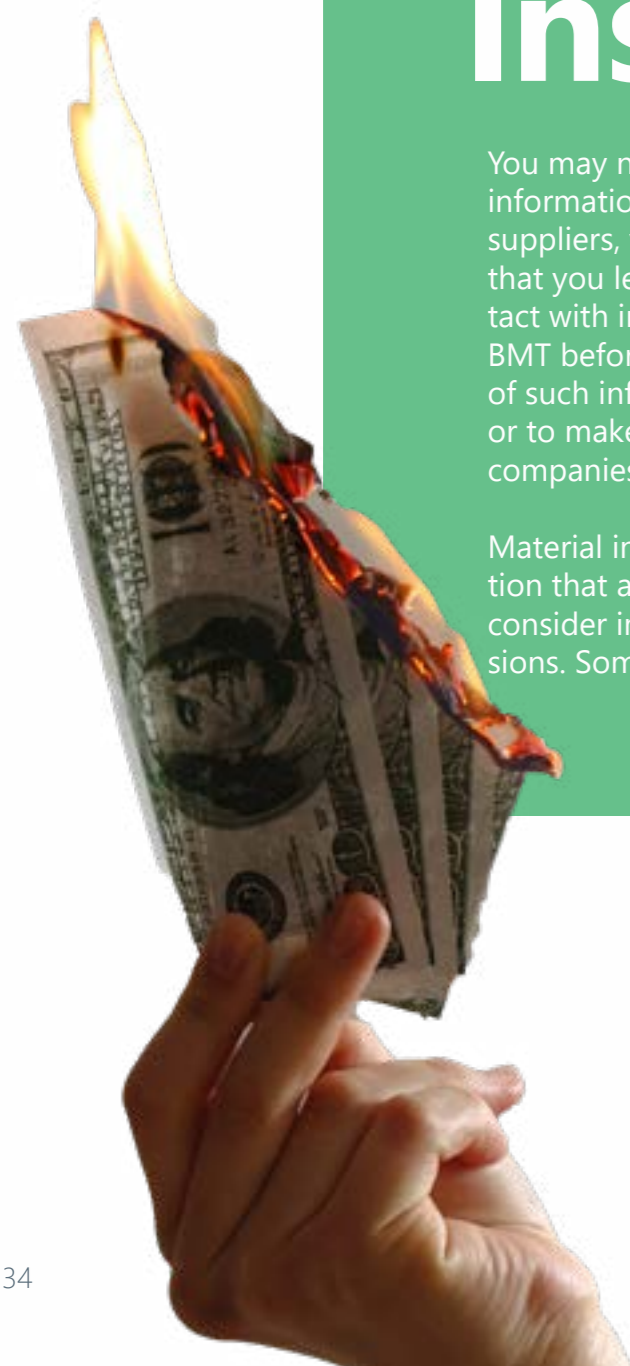
(<sup>(\*\*)</sup>) An "export" is defined as the transfer of goods, services, software, technical data, or technology to a foreign person, entity, or destination, regardless of whether that person is inside or outside the country of origin. Export activity is strictly regulated and may at times be prohibited, depending on the item being sent and its destination.

# Insider Trading

You may not use material non-public information about our customers, suppliers, vendors, or sub-contractors that you learn of or come into contact with in the course of your job at BMT before the general public knows of such information for personal gain or to make trades in publicly traded companies.

Material information is any information that a reasonable investor would consider important in making decisions. Some examples of "material

information" may include, but are not limited to: discussion of mergers and acquisitions, changes in management or executive structure of the company, awards or cancellations of contracts, and corporate financial information. When such information is not known to the public, it is considered "material nonpublic information". Until such material nonpublic information is well known by the public, you cannot use or disclose the information to third-parties.



# Trafficking of Persons

BMT is committed to respecting internationally recognized human rights. We comply with applicable employment laws and agreements on employment conditions including working and resting hours, and compensation and benefits.

Our Company has zero tolerance for human trafficking practices, the use

of child labor, or forced labor. We will not knowingly do business with any subcontractors, business partners, suppliers, or other third parties who violate this policy.

We respect employees' right to freedom of association and collective bargaining as well as any employee's choice to refrain from joining a union.





# Conflict minerals

Some of BMT's products may contain the essential minerals tin, tungsten, tantalum, and gold. While these minerals can be acquired in various parts of the world, many of them can be traced back to locations where human rights abuses are committed. In these countries, armed forces are often involved in the transportation of these minerals and the funding of the mineral extraction process — thus, the origin of the term "conflict minerals."

BMT takes efforts to ensure that the minerals we use in our products are not mined or transported from areas where war and conflict reign. We will not tolerate, profit from, or otherwise knowingly contribute to inhumane or degrading treatment related to or in connection with the procurement of these minerals.



# Government Investigations

Any time a Government Representative contacts BMT (either in writing, by telephone, or in person), be courteous, cooperative, and truthful with Government Representatives. Immediately contact the Site General Manager, who will involve BMT Corporate or the Legal Department as needed. This will ensure that we act appropriately while protecting BMT's legitimate interests.

**4.**

**Requests for  
Public Statements  
and Social Media**



# We Carefully Manage Requests for Public Statements

BMT is proud of its name and reputation. BMT's profile in domestic and international markets is greatly influenced by its ability to communicate consistently and professionally with external parties. To ensure accurate and complete information is conveyed to the public, to regulatory authorities, and to protect our Company's reputation, it's im-

portant for us to speak to the press, analysts, investors, and other outside parties with one cohesive voice. Therefore, we have designated individuals to serve as our official company spokespersons. Unless you are authorized to do so, do not make any public statements on behalf of BMT.

This means that you should not make any public statements, produce any document, or discuss any matters involving BMT or any BMT Group company without the prior written approval of the statement by the BMT Group General Counsel. Instead, you should refer all:

- ✓ requests for financial information to the BMT Group's Corporate CFO
- ✓ requests from the media to BMT Corporate Communications
- ✓ public requests for information and inquiries from government and regulatory agencies to the Legal Department
- ✓ inquiries related to a pending or threatened litigation or other legal matters to the Legal Department-minerals.

# We Use Social Media Responsibly

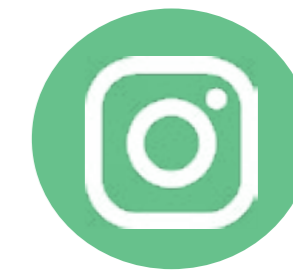
1. Corporate use of Social Media. BMT uses multiple social media platforms to help promote our business and engage with our customers. We designate experienced Company representatives to help develop and manage our social media activity, making sure we provide truthful, accurate information in a way that's consistent with our values. The Company's social media presence is managed by BMT's Corporate Communications Department.

2. Personal use of social media. Each of us has the ability to connect with everyone, everywhere throughout the world. We can communicate and share ideas with the touch of a button. We should always ensure that our use of personal wireless devices and the participation in online social networking show professional judgment, responsibility and consideration for others. Do not let it interfere with your work. Never imply that you have the authority to speak for BMT.

When using social media: - Clearly state that any opinions you express about our company are your own and do not reflect those of our company.

- Don't disclose confidential business information about our company or our customers, business partners or suppliers.

- Don't post anything that's confidential business information, discriminatory or would constitute a threat, intimidation, harassment or bullying



A close-up photograph of two hands shaking, symbolizing agreement or partnership. The hand on the left is wearing a black sleeve, and the hand on the right is wearing a red ribbed sleeve. The background is a solid blue color.

**5.**

**Honoring business obligations**

# Avoiding Personal and Organizational Conflicts of Interest

Sometimes our personal circumstances can inadvertently affect our objectivity in performing our duties and responsibilities to BMT. Even the perception of a conflict could negatively affect you and our company, causing severe reputational harm. You are expected to disclose any potential conflicts to ensure transparency and to

determine whether there is an actual conflict. Your disclosure of a potential conflict provides your management with information to clarify potential conflicts and resolve as appropriate. Due to the industries that some of our companies work in, certain employees may be required to complete an annual Conflict of

Interest Acknowledgement (notification will be sent to those employees via email), where they will be asked to disclose any conflict of interest. Generally, a potential conflict falls into one of several categories:

- ✔ Financial (e.g. holding a financial interest in a company that contracts with BMT)
- ✔ Professional (e.g., hiring a family member as an associate or a supplier of BMT)
- ✔ Personal (e.g., accepting employment or compensation that is inconsistent with BMT's interests)
- ✔ Misuse of property (e.g., using BMT property for your personal benefit)



# Maintaining Accurate Recordkeeping



## Business Records

We all make records of some kind, whether it's timekeeping records, expense reports, business records, or other financial statements, and we all have a responsibility to make sure that our Business Records are accurate.

a) BMT requires honest and accurate recording and reporting of information in order to make responsible business decisions. All of BMT's books, records, accounts and financial statements must be maintained in reasonable detail, must reflect all company transactions, and must conform to both applicable legal requirements and to the company's system of internal controls.

b) Communications that you generate or receive that are related to your job or BMT's business should be considered business records, including emails, phone calls and notes, expense reports, time sheets, memoranda, contracts, etc.

c) We must follow applicable records retention guidelines at all times. Business Records should only be destroyed in conformance with BMT's record retention policy. You are never permitted to destroy records in your possession or control that may be related to audits, government investigations, or pending, threatened or anticipated litigation.

## Financial Statements and Internal Controls

Integrity in financial reporting and public disclosure reinforces our reputation for honesty in the financial community. We have a system of internal controls designed to monitor the integrity of our business records and, in turn, our financial reporting.

To ensure accurate and honest financial reporting, you must record, classify, and summarize all transactions in accordance with BMT's Internal Control procedures, which comply with generally accepted accounting principles ("GAAP") and applicable laws and regulations.

You must never create, or encourage others to create, records that are intended to mislead or conceal improper activity. Such conduct violates Company policy and possibly the law.

Financial and accounting officers and personnel have a special duty to ensure the full, fair, accurate, timely, and understandable disclosure of BMT's financial results and condition. If you are unsure how to properly record a transaction, contact your Site General Manager, Division CFO, or HR Representative.

## Time charges and Expense

If you are a non-exempt (e.g., hourly) employee, you must charge your time and expenses consistently with Company accounting procedures. It is your responsibility to record your time carefully, promptly, and accurately. All employees, consultants, and contract labor personnel must properly record any expenses that are business related.

Anyone found to be mischarging time or expenses may be subject to disciplinary action up to and including termination of employment, and potentially subject to criminal liability.



# Safeguarding our relationships with our customers and suppliers

1

Relationships between BMT, its affiliates, its customers, and suppliers are founded on the principles of fairness, loyalty and mutual respect. Our business relationships are a key to our enduring success. We communicate honestly, respect information entrusted to us and stand behind our commitments. BMT shall not misrepresent material facts in order to gain a personal or business advantage.

2

Customers. You should make only commitments that BMT can keep. Think before you promise and do not over commit to something that BMT cannot deliver. If BMT is at risk of not being able to meet a commitment, work with the affected counterparty to find a solution and next steps. Coordinate with the internal business, contracts, and legal personnel to modify or terminate existing contracts as necessary. Never substitute material, change testing, or alter quality control requirements except in accordance with applicable customer procedures. Do not certify that something has been tested when it has not been. Accurately record all performance criteria required by the customer.

3

Suppliers, Sales Representatives and Consultants. You should select our suppliers, sales representatives and other consultants based on objective criteria such as price, quality, and prior performance. BMT requires competitive bids where appropriate, and you should fairly evaluate all proposals for work, and conduct due diligence, including Visual Compliance, on new suppliers and contractors.

# Ensuring High Quality Products and Services

Quality is the cornerstone of our brand. It is our job, every day, to produce high-quality parts and components for our customers. Our reputation for excellence is in part derived from providing these high-quality products and services. In fact, our business, reputation and success depend on our commitment to quality and regulatory compliance. The quality of our products and services is our ultimate measure of success.

To achieve the highest standards of safety for our customers, we must focus on quality all the time. Similarly, we firmly hold our suppliers accountable for assuring the quality of the goods and services they provide us.

Our expectation is that you will speak up whenever you become aware of a concern regarding BMT's products or services. You should bring product integrity concerns to the attention of your supervisor for further analysis and investigation. If you feel that your concern is not being addressed through this established process, you can submit your concern via BMT's Whistleblower Platform: <https://www.bmt.integrityline.com>



**6.**

**Safeguarding  
intellectual  
property,  
confidential  
information &  
company assets**

# Safeguarding intellectual property

We respect and protect intellectual property, whether it belongs to us or to our customers or suppliers.

a. BMT Intellectual Property. Intellectual property is one of BMT's most valuable assets. This includes inventions, patent applications, patents, trade secrets, ideas, know-how, and manufacturing processes, as well as trademarks, copyrights, and software (collectively referred to as "IP"). BMT owns all inventions, discoveries, ideas, and trade secrets created by you on the job and/ or produced using Company resources.

2. Third Party Intellectual Property. Each of us must also has a duty to safeguard and protect the IP of our third-party business partners. We should not disclose it to anyone, whether inside or outside BMT, without permission and then only to someone who has a business need to know. This means we must be cautious to never reproduce or use such property, software, or other technology except as permitted by an applicable license agreement and in compliance with applicable laws.

Confidential Information includes all non-public information that might be of use to competitors or harmful to BMT, its customers, or suppliers if disclosed. Confidential or proprietary information\* can be in any medium or format and can be generated by BMT or third parties.

We must also ensure that we never use, obtain, accept, or receive any information to which BMT is not clearly and legitimately entitled. As a general rule, if similar information about BMT is confidential, then we should assume that information about a third party is also confidential and treat it accordingly. If you are uncertain about the confidential status of information or whether the information was obtained properly, contact your manager, the Legal Department, or the Global Compliance office. For example, if a BMT employee is offered information about a third party such as a supplier, customer, or potential customer from an improper source, the employee should not accept or use that information.

\* financial results and personal data, investment strategies and opportunities, business plans and forecasts, employees' files, new products or services and strategic initiative, inventions, know-how or Trade Secrets, plant access codes, passwords to business devices, accounts.

# Safeguarding confidential information

You must protect and use information that you learn about customers, suppliers and business associates and partners in accordance with local laws and regulations regarding data privacy. BMT is part of an international company, with many employees located in the European Union and subject to the GDPR. We will comply with applicable data protection laws in every country in which we operate, as they apply to our employees, customers, and suppliers.

Any personal information we hold or collected will be: (i) used lawfully, fairly and in a transparent way; (ii) collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes; (iii) relevant to the purposes we have told you about and limited only to those purposes; (iv) accurate and kept up to date; (v) kept only as long as necessary for the purposes we have told you about; and (vi) kept securely.

If you have any questions or concerns about the personal data that we have on you, please feel free to reach out to Human Resources.

# Safeguarding personal data and data privacy

# Safeguarding corporate and customer assets

**You may not appropriate or divert BMT's or its customers' resources for your own personal benefit.**

1. Company Resources Defined. Company resources include but are not limited to: telephones, electronic mail and text or other social media for the Company, Internet access, voice mail, faxes, computers, hardware and software, equipment, machinery, and vehicles.

2. Intended use of Company Resources. BMT's and its customers' assets are intended to be used for BMT's business. You must use and maintain BMT's assets and its customers' property with the utmost care, guarding against waste and abuse. Protect Company resources within your control or supervision from loss, theft, or misuse, and use available means to protect these assets at all times and guard against waste and abuse. BMT's or its customers' property may not be removed from BMT's premises without management's written permission. The unauthorized removal of material, equipment, or supplies belonging to BMT is treated as theft. Similarly, the submission of a fraudulent expense report or use of a corporate credit card for personal use is viewed as a misappropriation and will be grounds for discipline.

# Promoting the Proper Use of Technology

**Computers and electronic information are essential tools that support our business. You always need to ensure that we use technology with our values in mind.**

- You may not use these technologies in connection with any illegal activities; post religious or political messages; communicate inappropriate, sexually explicit, or offensive statements that would be a violation of BMT's Discrimination and Harassment policy; conduct business for another company; or send unauthorized solicitations. As a rule, do not use BMT technology in any manner that could embarrass you or harm BMT's reputation.

- You should compose email, instant messages, and text messages with the same care you take in composing any other Company document. Electronic messages, both personal and business, are lasting and recoverable written records and can easily be copied and forwarded worldwide without your knowledge or consent. Never use these resources to send anything inappropriate. If you wouldn't say it in person, don't say it over email or IM.

- You should not expect privacy when using corporate email or the Internet, or when accessing personal accounts using Company assets. BMT reserves the right to monitor email and Internet access to ensure they are used responsibly and professionally. BMT also reserves the right to block offensive, illegal, and non-business related sites, and to intercept the entire content of any messages or files transmitted or stored in its system. This includes information that has been deleted by users — just because a message has been deleted, it doesn't mean that it's not recoverable. Monitoring activities, when undertaken, will comply with all local laws and regulations.



**OMCO**<sup>®</sup>

7 ●

**Promoting a safe  
and ethical  
workplace**



# Workplace safety, no weapons & drug free workplace

## Safe Work Environment.

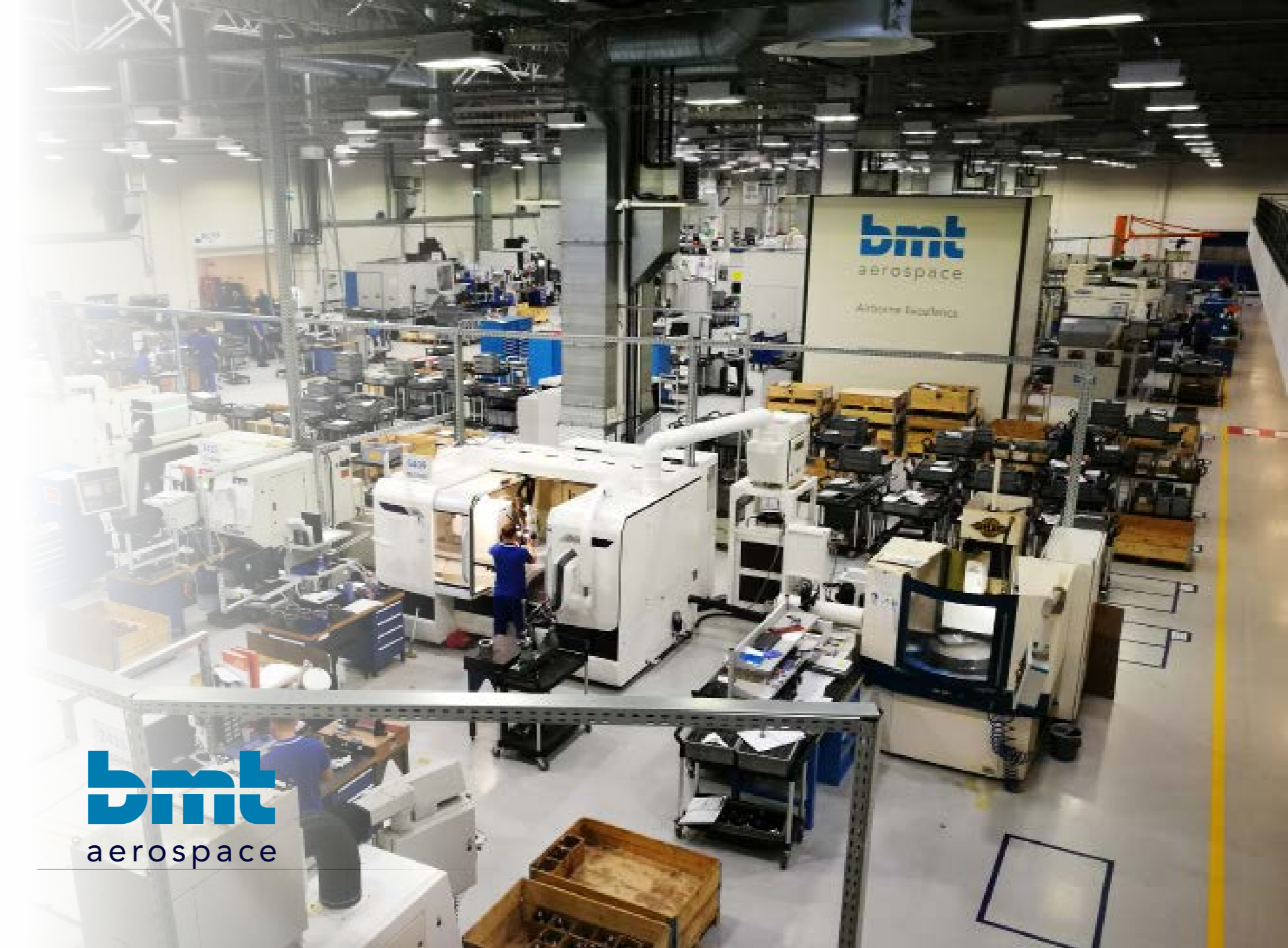
BMT is committed to providing a safe work environment for all of its employees in compliance with all federal, state and local laws and regulations governing workplace safety. All employees have a responsibility to make BMT a safe place to work by following all safety and health rules and to report to the appropriate leadership, any accidents, injuries, and unsafe equipment, practices or conditions.

## No workplace violence.

BMT does not tolerate violent behavior or threats of same at any workplace, whether committed by or against our employees. The following conduct is prohibited: making threatening remarks, causing physical injury to someone else, intentionally damaging someone else's property, or acting aggressively in a way that causes someone else to fear injury. Weapons are generally prohibited on Company premises or while at Company activities. Exceptions include weapons carried by law enforcement officers on official business or security personnel where allowed.

## Drug Free Work Place.

You should not report to work, or perform your job while under the influence of alcohol, illegal drugs, or controlled substances, without a prescription. Their misuse can endanger you or someone else's safety, health and productivity, and possibly compromise the safety or quality of our products. You may not possess or distribute illegal or controlled substances during work hours, while on the Company's facilities or when carrying out Company business.





# Respect each other

1. Our global workforce allows us to compete in a global marketplace. The full value of each employee's contribution can be achieved when we appreciate and recognize the importance of our collective backgrounds, experiences and perspectives. This can be only be achieved if we respect each other's contributions.

It is BMT's policy to recruit, hire, train and promote employees based on qualifications without regard to race, color, religion, sex, sexual orientation, gender identity, veteran status, marital status, height, weight, national origin, age, handicap or arrest record or other protected category under applicable state and federal law.

2. BMT prohibits abusing the dignity of any employee, customer or work-related business contact through ethnic, racist, sexist, religious, or age-related comments, references or materials, or with respect to any employee's handicap (actual or perceived), height, weight, arrest record, veteran or marital status or other protected category under applicable state or federal law. Derogatory comments, slurs, statements, or derogatory or objectionable conduct in violation of this policy will result in disciplinary action up to and including immediate discharge, at the sole discretion of BMT.

3. Harassment may also occur when the behavior of one or more associates creates a hostile or offensive work environment for others. We value a work environment that is free from intimidation or harassment. Harassment can take many forms, such as sexual advances or inappropriate comments, jokes, language or gestures. Any form of harassment is unacceptable and must be reported immediately so corrective action can be taken.

4. Complaint Procedure. If you believe that you have been the subject of any illegal discrimination or harassment, including sexual harassment, or observe behavior in violation of this Code you should report the alleged act as soon as possible to ensure that we can take appropriate steps to investigate the matter. If possible, and appropriate, you should submit all complaints to your site HR Manager or site General Manager, or through BMT's Whistleblower portal:

<https://www.bmt.integrityline.com>.

# Respect the environment

In all jurisdictions where we do business, we comply with environmental protection laws and regulations, including recycling and waste disposal requirements. Our Company is also committed to helping the environment. Not only do we comply with applicable environmental statutes and regulations in all countries where we operate, we also strive to improve our environmental performance in all of our operations, promote sustainability in our business activities, and work to protect the environment of the communities in which we operate. For more detailed guidance for your role and location, consult the EHS supervisor at your local facility.

# 8.

## Personal and corporate political activity/charitable acts

### **A. Campaign finance laws.**

Campaign finance laws in the US and other countries restrict the ability of companies like AAM to support political candidates and causes. BMT employees, officers, and Board members may not commit BMT to contribute money, services, use of facilities, fundraising sponsorships or support a political candidate or cause without prior written approval of BMT's Group General Counsel.

### **B. Personal Activities.**

We encourage employees to make a difference on a personal level. We support your involvement in charitable and political activities on a volunteer basis, but in general, you must do so on your own time and at your own expense, making sure your activities are lawful and consistent with our policies. Unless you receive approval in advance, please do not use or donate company funds or assets to further your personal volunteer activities. You should seek legal advice before contributing anything to a charity that is affiliated with a Government official or owned, operated, or controlled by a government official or entity.

When engaging in personal political activities, it is important to make it clear that your political views and actions are your own, and not those of BMT, avoid any potential conflicts of interest; and pay for all personal political activities from your own funds. BMT will not reimburse employees for personal political contributions or other expenses related to political activities. If you plan to seek or accept a public office, you must disclose this to the Site General Manager or Human Resource.

# Final words



**Every BMT employee has a responsibility to maintain our reputation for high ethical standards. To meet this responsibility, we expect you to:**

Be professional, honest and ethical in everything you do on behalf of BMT

Be familiar with our Code, and comply with the laws and policies that pertain to BMT

Complete all required training in a timely manner and apply it to your job every day. Ask questions if you aren't sure about the right action

Report concerns about possible violations of laws, regulations, our Code and Policies

Cooperate fully and tell the whole truth when responding to an investigation or audit

Be accountable for your actions. Remember, violations of our Code, applicable laws or our company policies are grounds for corrective action, up to and including dismissal.

Our Code is not a contract. It does not convey any specific employment rights or guarantee employment for any specific period of time. It may be unilaterally changed from time to time so be sure to check back periodically.



BY CERTIFYING TO OUR CODE OF CONDUCT, YOU ARE ACKNOWLEDGING THAT:

I have read and understand BMT's Code of Conduct and Business Ethics

I have had the opportunity to ask questions regarding the contents of the Code of Conduct and Business Ethics and understand how the contents relate to my position with the company

I agree to ask questions of the appropriate resources when I am not sure about the right course of action

I agree to abide by the principles of BMT's Code of Conduct and Business Ethics

I agree that I will timely complete all required training

I understand my obligation to promptly report to the company any suspected violations of the Code of Conduct and Business Ethics

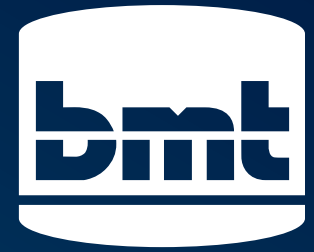
I agree to cooperate in any investigations of such possible violations

Acknowledge by:

Signature:

Name (Typed or printed)

Date



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