



TESSENDERLO GROUP POLICY

Policy Title	Date	December 14, 2022
CSR (CORPORATE SOCIAL RESPONSIBILITY) POLICY		

Target audience	All employees and subsidiaries of Tessenderlo Group.
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Subject & purpose	This policy outlines how we conduct our CSR (Corporate Social Responsibility) or ESG (Environmental, Social, and Governance)
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Scope	
Business Unit/Department/Site/Plant	All in scope
Out of scope	None
Joint Ventures (relevance and specifics)	This policy is applicable to Joint Ventures where Tessenderlo Group has a controlling stake

Terminology	
Expression	Definition
CSR	Corporate Social Responsibility
BU	Business Unit
HQ	Headquarters
SPOC	Single Point of Contact
Q-calls	Quarterly calls for updates on company, financial and CSR info
L-levels	Leadership levels
SVP	Senior Vice President
LTI	Long Term Incentive or Lost Time Incident
LMS	Learning Management System
ESG	Environmental Social Governance
TG	Tessenderlo Group
GRI	General Reporting Initiative
SDG	Sustainable Development Goals of the United Nations
UNGC	United Nations Global Compact
NA	Not Applicable
H&S	Health & Safety
JV	Joint Ventures
STI	Short Term Incentive
E-Level	Expert Levels
HFM	Oracle Hyperion Financial Management System



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1 Introduction

This policy takes the CSR strategy as a basis, which is described in point 2: CSR General Strategy. The strategy, in turn, is derived from the CSR materiality matrix of our company, which outlines the materiality topics; in other words, the topics where we have an impact, and which we monitor today, as shown in the materiality figure, as well as the tabulated results of the topics shown in section 2. As such, the reader gets a compact, clear, and concise picture of what we as Tessenderlo Group do and focus on today, as well as what we plan to work on for the future. With regard to governance in general, but also specific to CSR, it is important to CSR or ESG that we also elaborate on the governance specifically under point 2. Sustainability or CSR is a process that is under continuous development and therefore, this policy will be updated on a regular basis.

2 CSR General Strategy

Tessenderlo Group is driven by a bold and inspiring vision: we want to ensure that life on our planet will thrive by helping to create a world that makes the most of its resources. This vision entails growing more food than ever before with the least possible input, using water as intelligently as possible and creating value from bio-residuals.

We aim to understand what is happening in the world today to determine how we can build the business of tomorrow. To achieve this objective, we realize that we need to consider to do things differently.

Behind everything we do lies a simple philosophy: Every Molecule Counts. This short but striking slogan defines our unique attitude towards sustainability, innovation and people. It encompasses the power of an idea or action, however small, to change the world.

Tessenderlo Group strives to find more sustainable solutions to existing problems. We aim to minimize our ecological footprint and to maximize the contribution of our products in the transition to a more circular and green economy. We offer various products and environmentally friendly solutions, in which we typically reclaim and transform by-products from our own or other industries.

Tessenderlo Group and its subsidiaries strive to embrace and comply with its moral, ethical, and legal responsibilities, in conducting its CSR policy. We take our social responsibility very seriously and aim at reducing our impact on the natural environment.

We also link our ambitions to the SDGs (Sustainable Development Goals of the United Nations). We are focusing on the most relevant SDGs related to the activities of our group.

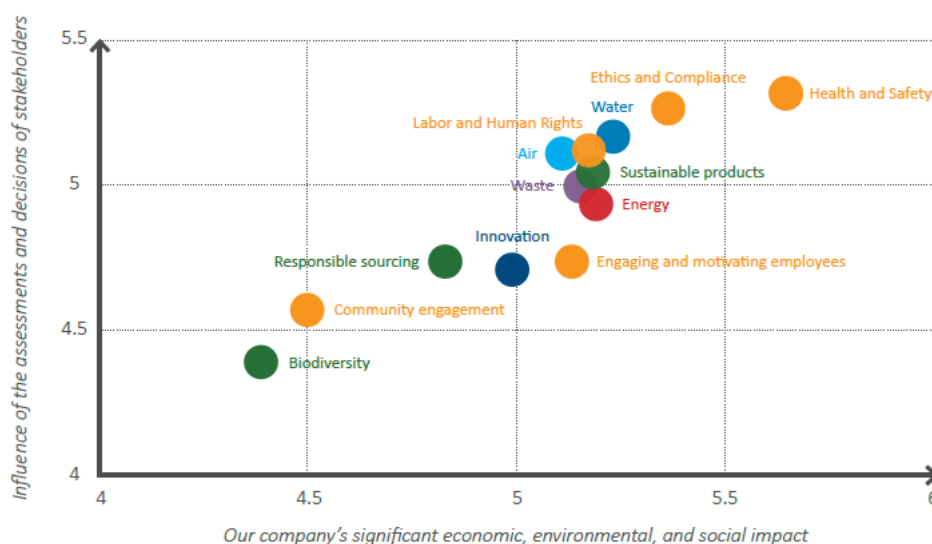




In order to implement and steer the topics of impact and importance to CSR at Tessenderlo Group, a double materiality matrix has been developed. It outlines on the X-axis what impact the company has on the different topics (dots) and on the Y-axis how stakeholders or their representatives judge this. The dots in orange refer to the social topics; the multicolored dots are more linked to environmental topics.

From the materiality matrix, for each topic, a selection of KPIs and targets is made in order to execute the CSR strategy. All employees have their role to play. Dynamic materiality is applied: at certain intervals, the materiality matrix will be updated to reflect the evolution of CSR in general and will be related to the development of CSR at Tessenderlo Group specifically.

Tessenderlo Group is also aligned with the principles of the UN Global Compact.



For an overview of how the materiality topics, with their current metrics and KPIs, are linked to the higher level goals of the United Nations and also our policies and management approaches at Tessenderlo Group that are aimed at reaching our targets, we refer you to our sustainability reports which are available at <https://www.tessenderlo.com/en/sustainability/sustainability-reports>.



material topic TG (see materiality matrix)	associated material aspect (GRI)	GRI (General Reporting Initiative)	SDG (UN Sustainable Development Goals)	TG related policies
Health & Safety	Lost Time Incident Frequency Ratio for all employees and contractors	403-2-9-10	3, 8	H&S policy
	Near misses frequency ratio		3,8	
	Workers representation in formal joint management-worker H&S committee	403-1, 102-41	3, 8	
	Group insurance percentage coverage	401-2, i, iii	3	
Labor & human rights	Diversity of governance bodies (gender % of E & L level and board)	405-1a	8, 10	Diversity and Inclusion policy
	Diversity of employees (per gender, age category and per region)	405-1b, 102-8	8, 10	Human and Labor Rights policy
	% of employees trained in Code of Conduct and Labor & Human rights	412-2b	8, 10	
	Equal opportunity-ratio of basic salary and remuneration of women to men at L level	405-2	8, 10	
	Equal opportunity-ratio of basic salary and remuneration of women to men at E level	405-2	8, 10	
	Operations in which the right to freedom of association and collective bargaining may be at risk	407-1	8	
	Employee Turnover per year	401-1, b	8, 10	
motivating employees	Average of hours of training per employee per year, excluding training on the job/machine	404-1	8, 10	Learning and Development policy
	Employees receiving regular signed performance and career development reviews expressed in % of E and L grades	404-3	8, 10	Group Talent Strategy policy
	Average years of seniority / Company Service	(401-1, b)	10	
	Retirement fund percentage coverage	401-2, v	8, 10	
ethics & compliance	% of employees of E and L level trained in Code of Conduct and Anti-bribery and Anti-corruption	205-2	4	Anti Bribery and -corruption policy Trade Anti-trust Competition policy Insider trading
	% of all employees trained in Code of conduct	205-2, 102-16-17, (410-1)	4	Code of Conduct policy
	% of targetted employees trained in IP and confidential information	(418-1)	4	Group IP policy
	% of te TKIno employees trained in Harrassement & discrimination in the workplace	(410-1)	4	Diversity and Inclusion policy
communities	Collaborations in which communities are involved	103 & 413-1	2, 10, 11	
	procurement training in CSR		4, 8, 11	Procurement Sustainability Policy
	Supplier CoC % suppliers signed		11, 12	Supplier Code of Conduct

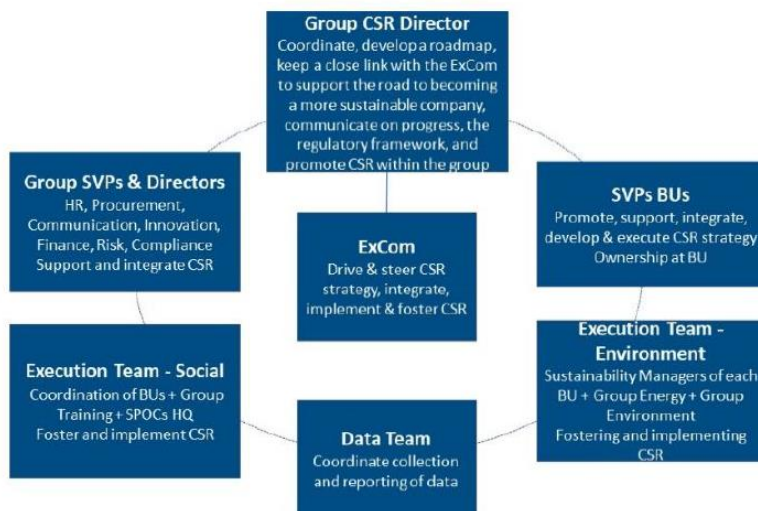
material topic TG (see materiality matrix)	associated material aspect (GRI)	associated material aspect (GRI)	GRI	SDG	Policy	
Environment	Energy	Total energy consumption within the organisation, in joules or multiples, and per business segment	302-1 e	12, 13, 14, 15	Corporate Social Responsibility policy	
		Energy intensity	Total energy intensity ratio for the organisation, and per business segment			302-3 a
	Organisation-specific metric (the denominator) to calculate the ratio		302-3 b			
	Types of energy included in the intensity ratio		302-3 c			
	The ratio uses energy consumption within the organisation, outside of it, or both		302-3 d			
	Water withdrawal	Total water withdrawal from all sources	surface water	303-3 a.i		6, 9, 11, 12, 13, 14, 15
			ground water	303-3 a.ii		
			3rd party water including city water	303-3 a.v		
			Information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions	303-3 d		
	Water intensity	Water intensity	NA			
Organisation-specific metric (the denominator) to calculate the ratio		NA				

In order to fulfill these responsibilities, Tessengerlo Group will ensure that the appropriate level of resources is made available, together with the continuous improvement of our CSR performance.



3 CSR Governance

Tessengerlo Group has the following governance structure in order to implement, drive, and steer the CSR strategy and policies and integrate and coordinate between group functions and the different business units (BUs) for social as well as environmental topics. CSR is promoted, supported, and validated at the highest level of the company: the ExCom and the Board.



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Separate monthly CSR-ESG meetings are set between the Group CSR Director and the ExCom, as well as the Execution Team Environment. These are supplemented with many one-on-one meetings. Regular separate meetings are set with the Group CSR Director and the Execution Team Social, the Compliance Team, and the various Group (S)VP functions (HR, Communication, Finance, Legal, etc.), as well as the Data Team.

Tessengerlo Group also plans to steer and monitor the KPI results, compared to targets. In order to drive CSR, the targets are linked to the LTIs (Long Term Incentives) for the SVPs and the BU Management Teams, and also STIs (Short Term Incentives) for our E-level and L-level population. Our data mining for the KPIs is done at BU level with the Execution Teams of Environment and Social in cooperation with the Data Team. Our environmental data are integrated and secured on the HFM system, which is our global financial reporting platform. Our data are increasingly being populated and integrated in our global reporting platforms.

Reporting of environmental CSR KPIs and targets is performed on a quarterly basis and communicated via regular calls by the ExCom. Yearly results of the KPIs are also to be found in the annual report.

Both internal and external communication is key in CSR in order to send the right message regarding what we do and what we aim to do, and to get all our employees on board on our CSR-ESG journey. Regular meetings are taking place between the Group CSR Director and the Communication Team in order to plan and execute CSR communication via the website, InSider (our intranet), e-zines, presentations, and CSR reports.





To achieve the goals set out in this policy, several tools and actions are either current, in development, or planned.

The CSR progression is also scored yearly by an external assessor, Ecovadis, which is one of the world’s most trusted business sustainability rating companies. It scores more than 85,000 companies in more than 200 different industries. Ecovadis scores us on Environment, Labor & Human Rights, Ethics, and Procurement. Detailed feedback allows us to better monitor and manage our progression and to focus on and improve our path going forward.

Besides the assurance of Ecovadis, we will also be statutory audited according to the requirements of the new CSRD (Corporate Sustainability Reporting Directive). Internal assurance will also be provided via CSR assessments to the BUs, on the level of the BU SVPs, by Internal Audit during their meetings and visits. This will be aligned with the UNGC approach, in which we also participate.

4 Social topics

4.1 Health & safety

Tessengerlo Group and its subsidiaries embrace their legal, ethical, and moral responsibilities, in protecting the health & safety (H&S) of employees, contractors, customers, and the communities in which we operate. We will ~~always~~ strive to conduct our business to the highest practicable standards. Reference is also made to our Health & Safety policy.

Tessengerlo Group’s Safety and Health Policy is integrated into group processes, operations, and systems. The protection of employees, customers, suppliers, visitors, and neighbors against unacceptable risks overrides economic considerations and may not be compromised. In the event of any doubts, the overriding principle of precaution must apply.

Accidents and life-threatening situations will be thoroughly investigated in order to determine and implement the improvement actions required to prevent any repeat event. All employees are expected to report all such events to local management so that the appropriate procedures can be followed.

Health and Safety			
ASSOCIATED MATERIAL ASPECT (GRI)	Lost Time Incident (LTI) frequency rate* (all employees and contractors)	Workers representation in formal joint management-worker H&S committee	Group insurance percentage coverage (employees that are covered by a Group Insurance Program (Europe)/ Life Assurance coverage (elsewhere))
GRI	403-2-9-10	403-4	401-2, i, iii
SDG	3, 8		3

Monthly reporting and historical statistics are gathered and reported. The LTI (Lost Time Incident) frequency rate data are also part of the CSR reporting, together with the severity frequency rate (new), the total safety performance index (new), workers representation in H&S Committees, and Group Insurance coverage. Quarterly calls and many meetings at several levels of the company incorporate this reporting to stimulate awareness throughout the entire Tessenderlo Group. Also, incentives for E-levels and L-levels are linked to this parameter.



4.2 Ethics & compliance

Tessengerlo Group requires honesty and integrity from all its employees in the application of the Code of Conduct and in all aspects of their business and expects the same of all their partners. Tessengerlo Group adheres to generally accepted international standards for business practices, which form the basis for its activities and relations worldwide.

All employees and subsidiaries of Tessengerlo Group worldwide are required to comply with the Tessengerlo Group Code of Conduct. The overarching Code of Conduct refers to policies on the specific items: dealing with business ethics, health and safety, employee conduct, and compliance with regulations (conflicts of interest, bribery & corruption, insider training, competition compliance, disclosure of business transactions, business gifts & entertainment, non-disclosure, company property, non-solicitation, confidentiality, and violations of the Code of Conduct). A list of policies is mentioned at the end of this document. The Code of Conduct also describes the procedure in case of questions or violations (whistleblowing procedure).

The Code is available in 11 languages and each employee receives a copy of this Code of Conduct or a link to this Code of Conduct upon onboarding. It is a mandatory training session in our compliance training curriculum for each employee.

Anti-Bribery and Anti-Corruption are highlighted in a specific policy and training is organized on the subject. All companies belonging to Tessengerlo Group conduct their businesses in accordance with the highest ethical standards and all forms of bribery and corruption are prohibited. The Anti-Corruption and Anti-Bribery Policy prohibits bribery of government officials as well as private sector (commercial) bribery, including the offering, promising, authorizing, or providing anything of value to any customer, business partner, vendor, or other third party in order to induce or reward the improper performance of an activity connected to the business of the company.

Ethics and Compliance				
ASSOCIATED MATERIAL ASPECT (GRI)	Anti-corruption & anti-bribery policy as part of the antitrust training in % success ratio (people finished the training for 100%/people invited for the training)	Code of conduct training (measured over multi-year cycle) - % success ratio (people finished the training for 100%/total people invited for the training)	IP and confidential information training (measured over multi-year cycle) in % success ratio (people finished the training for 100%/total people invited for the training)	Training harassment & discrimination in the workplace (TKI) in % success ratio (people finished the training for 100%/total people invited for the training)
GRI	205-2	205-2, 102-16-17, (410-1)	418-1	410-1
SDG	4			

Training sessions on this subject as well as other compliance training sessions are part of an integrated LMS, where all E-levels and L-levels have direct access and where the status of the training sessions can be monitored and consulted. The targets for training sessions are set at a 95% success ratio.

Any concerns employees might have regarding the Code of Conduct in all its aspects, and also the other policies we have at Tessengerlo Group, can be raised either directly with the line manager, the local Senior Leader, or confidentially brought to the attention of the Compliance Officer by writing to: codeofconduct@tessengerlo.com. Tessengerlo Group has a Whistleblowing procedure, as part of the Code of Conduct, outlining this.





4.3 Labor & Human rights

Tessengerlo Group respects human rights, believes in sustainable business, and considers respect for human rights and the adherence to labor rights to be an integral component of our business conduct. Our Human Rights and Labor Rights Policy strengthens our adherence to the international human rights principles that are encompassed in the Universal Declaration of Human Rights, the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work, and the Ten Principles of the United Nations Global Compact.

In particular, we embrace the following principles:

- No forced labor and human trafficking
- No child labor
- Protecting and improving the safety, health, and general well-being of employees, customers, suppliers and neighbors (see point 3.1)
- No discrimination
- Working hours, wages, and benefits are competitive remuneration packages relative to the industry and the local labor market. Tessengerlo Group follows applicable wage, working hours, overtime, and benefits laws in the countries where we operate, or, in the absence of such laws, with international labor standards
- Tessengerlo Group will always do its utmost to prevent involuntary terminations
- Freedom of Association and Collective Bargaining. We respect our employees’ rights to join or form a labor union, seek representation, bargain collectively, in accordance with local laws and without fear of reprisal, intimidation, or harassment.

The Human Rights Declaration refers in articles 1 & 2 to Diversity & Inclusion and Equal Opportunity. All human beings are born free and equal in terms of dignity and rights. Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, color, gender, language, religion, political or other opinion, national or social origin, property, birth or other status.

The Tessengerlo Group Diversity & Inclusion policy outlines that inclusion is about ensuring people feel welcomed, which positively impacts our employee engagement and productivity. By valuing and leveraging these differences, Tessengerlo Group aims to foster innovation and growth.

In the context of labor and human rights we monitor the relevant KPIs in our CSR program.

Labor and Human Rights						
ASSOCIATED MATERIAL ASPECT (GRI)	Diversity of governance bodies (gender % of L level, E level and board)	Diversity of employees (per region, per gender, and per age category expressed in total numbers)	Equal opportunity-ratio of basic salary and remuneration of females to males at L level	Equal opportunity-ratio of basic salary and remuneration of males to females at E level	Operations in which the right to freedom of association and collective bargaining may be at risk	Employee turnover for 2020
GRI	405-1 a	405-1 b, 102-8 8	405-2 8	401-2, i, iii	407-1	401-1 b
SDG	8, 10	10		3	8, 10	8





4.4 Motivating Employees

We, as Tessenderlo Group, want to:

- Develop all of our people to make the best use of their talents,
- Create a company that makes a difference to our planet and our people,
- Live and work our 6 attitudes: Positive - Courageous - Curious - Decisive - Connected - Focused

Our leaders are crucial in this process and they must accept the quest to develop the talent of our people. We do this through empowering leadership, talent management, career planning, and a learning culture supported by our data management systems, where we can develop and monitor training curricula for the employees. Training sessions, training hours, and career development reviews going hand in hand with open, transparent, and signed performance reviews are KPIs that are monitored. The average years of seniority also reflect that our company has a lot of employees with long-term service. Also, additional legal benefits, such as retirement funds coverage are monitored in order to measure the CSR material topic under “Motivating Employees”. Besides the KPIs, targets are also set in order to drive the progress.

Motivating employees				
ASSOCIATED MATERIAL ASPECT (GRI)	Average of hours of training per employee per year, excluding training on the job/machine	Employees receiving regular signed performance and career development reviews expressed in % of E and L grades	Average years of seniority/ Company Service (Number of completed years of service by employees on our own payrolls)	Retirement fund percentage coverage (Percentage of own payroll employees who are provided with a company contribution to a supplemental retirement fund. Funding to a State provided pension through employer/employee social security contributions does not count)

4.5 Communities

Tessenderlo Group is a responsible member of society, in which we play an active role. Our objectives of sponsorship are to maintain good relations with the local communities where our plants’ operations are established, to maintain good citizenship; to enhance our relationships with educational institutions and demonstrate the group’s commitment to sustainability by supporting various sustainability initiatives that will contribute to it. We support activities that relate to our sustainability strategy in fields such as education, health, safety and the environment in the non-profit sector. These initiatives also support our business objectives and enhance the visibility of Tessenderlo Group and its affiliates. A sponsorship policy outlines our approach towards this topic.

4.6 Procurement

Looking from a social, ethical or environmental perspective, Procurement is a very important area in terms of sustainability. We look to our own impact for the material topics, but the impact from the supply chain is as important, or- even more important - in terms of emissions or impact on the environment. At Tessenderlo, we have a Group Procurement Sustainability Policy. The purpose of this policy is to solidify sustainability and CSR within Procurement and our suppliers’ communities.



In addition to our Group Procurement Sustainability Policy, we also have our Tessenderlo Group Supplier Code of Conduct listing for our suppliers the requirements with respect to business ethics, social, safety, health, and environmental performance, in line with Tessenderlo Group's guiding principles.

We expect all our suppliers, subcontractors, joint venture partners, and agents to comply with these requirements. The Supplier Code of Conduct is an integral part of the business contracts, and it is a prerequisite for business partners to be selected to do business with our group.

We are in contact with our supply base to have this document integrated and signed. On a regular basis, training on sustainability topics will be provided to the Procurement Community of the Group. Every training session will be registered on our Group LMS system and be available for new members, in the onboarding program, belonging to the target audience.

KPIs and targets for Procurement that are monitored are:

- KPI Supplier Code of Conduct: 2021: 75% - 2022: 77% - 2025: 80% of our annual spend suppliers must sign our Tessenderlo Group Supplier Code of Conduct or provide us with their own Supplier Code of Conduct. Responses will be registered in our ERP systems. In 2025, this target will be increased to 80%.
- KPI Sustainability Training sessions: the Procurement Community must achieve an attendance rate of a minimum 95% on the sustainability training sessions. This will be registered in LMS.
- KPI Ecovadis Procurement score: from the year 2023 onwards, our Tessenderlo Group sustainability procurement score must exceed the "World Sustainability Procurement" score that is published by Ecovadis in its yearly "Business Sustainability Risk and Performance Index year x" report.

5 Environmental topics

We refer here to the Tessenderlo Group and CSR strategy: behind everything we do lies a simple philosophy: Every Molecule Counts. This short but striking slogan defines our unique attitude towards sustainability and innovation. It encompasses the power of an idea or action, however small, to change the world.

Tessenderlo Group continually strives to find more sustainable solutions. We aim to minimize our ecological footprint and to maximize the contribution of our products in the transition to a more circular and green economy. We offer various products and environmentally friendly solutions, in which we typically reclaim and transform by-products from our own or other industries.

There are two approaches regarding environmental sustainability:

- 1) Reduce the impact of our own operations on the environment, related to climate change mitigation
- 2) Reduce the impact of the environment on our operations, related to climate change adaptation





1) Reducing the impact of our own operations on the environment (inside out view):

Going back to the subject of materiality we see that there is a whole cluster relating to sustainable products: energy, water, air, and by-products. “By-product” is our preferred terminology above “waste”, because we see these as value products in our “Every Molecule Counts” philosophy. Energy and water are tackled as the first topics at group level to report on in our step-by-step approach. Energy and CO2 relate to climate change mitigation and both energy and water are seen as very important environmental topics, where our company also has an impact. We work continuously on energy efficiency. Of course, next to these material topics, other parameters will follow such as monitoring of the upcycling of by-products and the use of recyclates in our strategy towards the circular economy.

At this point in time, we have 4 main approaches for environmental topics:

- Circularity (Every Molecule Counts)
- Optimization of conversion of raw materials (Every Molecule Counts)
- Optimization (energy and water)
- Reducing CFP (Carbon footprint)

Innovation is seen as an enabler of the environmental bubble on the materiality index. A continuous drive for better and more sustainable products is the motor of our innovative thinking (see the above picture). It is important that at the earliest stage of project ideation the principles of sustainability are taken into account. As such we prepare for “sustainability by design” and monitor this integrating CSR screening factors in our Stage-Gate process for innovation and CapEx projects. The CSR-related monitoring of the projects portfolio will also give a good picture of the sustainable products and projects pipeline and the future growth of sustainability at our company.

Energy and water are monitored by KPIs. 3-year targets (2022-2024) are being set for both parameters as well as CO2. In order to reach these targets, many projects are planned or in the execution stage across the different BUs. These can be product-related or process-related. Operational Excellence programs also help in this context. Apart from the Tessenderlo Group environmental policy, as described under this paragraph, several BU environmental policies are current, such as Energy and Energy Efficiency Policies, e.g. for some of our plants we have Energie Beleidsovereenkomsten (Energy Policy Agreements); some other BUs have their own environmental policies and might be monitoring some more CSR-related KPIs and targets, but they are always integrated in the Tessenderlo Group CSR approach.

ASSOCIATED MATERIAL ASPECT (GRI)	Energy (MWh/y)	Energy intensity (MWh/t)			
	Total energy consumption within the organization, in MWh, and per operating segment	Total energy intensity ratio for the organization, and per operating segment	Organization-specific metric (the denominator) to calculate the ratio	Types of energy included in the intensity ratio	The ratio uses energy consumption within the organization, outside of it, or both
GRI	302-1 e	302-3 a	302-3 b	302-3 c	302-3 d
SDG	12, 13, 15				



ASSOCIATED MATERIAL ASPECT (GRI)	Water withdrawal (m ³ /y)				Information necessary to understand how the data have been compiled, such as any standards, methodologies, and assumptions used	Water intensity (m ³ /t)	
	Total water withdrawal from all sources	Water withdrawal by source				Water intensity	Organization-specific metric (the denominator) to calculate the ratio
		Surface water	Ground water	Third-party water including city water			
GRI	303 3 a	303 3 a i	303 3 a ii	303 3 a v	303 3 d	NA	NA
SDG	6, 9, 11, 12, 13, 15						

2) Reducing the impact of the environment on our operations (outside in view):

Climate change adaptation, which is seen as the process to adjust to the effects of climate change, is monitored with the support of our Axa Climate project, which gives us a clear view on our actual and future exposure related to climate change. We screen all our own sites, rented terminals, consignment stocks, tolling sites and our key business supply chains on natural hazards and the possible exposure to climate changes. Extreme weather events and droughts pose additional risks through damage to assets and/or adverse consequences on operations, supply chains and insurance costs. In the broader picture, we also refer to our Enterprise Risk Management Policy where CSR-ESG risk is also taken up in the screening and the plan.

List of referenced policies & documents:

- Tessengerlo Group Code of Conduct
- Whistleblowing Procedure, as part of the Code of Conduct
- Labor & Human Rights policy
- Diversity & Inclusion policy
- Health, Safety and Environment policy
- Learning & Development policy
- Anti-Bribery and Anti-Corruption policy
- Competition Compliance policies
- Insider Trading – Dealing Code
- Trade Compliance policies
- Enterprise Risk Management policy
- Tessengerlo Group Talent Strategy
- Procurement Sustainability policy
- Supplier Code of Conduct
- Data Privacy and Protection policy
- Sponsorship policy
- Stage and Gate Governance (innovation)
- Tessengerlo Group CSR report

Disclaimer

All statements in this policy other than statements of historical fact are, or may be deemed to be, forward-looking statements. By their very nature, forward-looking statements involve inherent risks and uncertainties. We caution you that a number of factors could cause actual results to differ materially from some statements. Readers should thus not place undue reliance on forward-looking statements.



Approval			
Name	Function	Date of issue	Version
Stefaan Haspeslagh	CFO & COO	1/1/2022	1.0
Stefaan Haspeslagh	CFO & COO	14/12/2022	2.0

Responsibilities		
Area	Name	Function
Validation of the policy	Stefaan Haspeslagh	ExCom
Implementation of policy (see governance)	Stefaan Haspeslagh SVP BUs & Greet Hombroux & CSR-related HQ functions & SPOCS environmental and social	ExCom & SVP BUs & Group CSR Director & CSR-related HQ functions & SPOCS environmental and social
Development and maintenance of policy	Greet Hombroux	Group CSR Director
Monitoring of compliance to policy	Charles Hubert	Group Internal Audit Director