

HUMAN RIGHTS, LABOR RIGHTS, HEALTH, SAFETY, AND WELL-BEING POLICY

May 2026



1. PURPOSE, SCOPE, AND AMBITION

PURPOSE

BME is committed to being a reliable and responsible partner for all its stakeholders, conducting its activities with respect for human rights, labor rights, integrity, and safety. As a signatory to the United Nations Global Compact (UNGC), BME supports its Ten Principles, including the commitment to respect internationally proclaimed human rights and to ensure it is not complicit in human rights abuses. Through regular dialogue with employees, suppliers, customers, and the communities we operate in, we integrate expectations and concerns into our Policy priorities and implementation. This Human Rights, Labor Rights, Health, Safety and Well-Being Policy (“Policy”) provides the framework within which BME manages risks, takes preventive measures, and reports transparently on the objectives set in these domains. It aims to:

- Protect human and labor rights across all BME activities,
- Guarantee safe, healthy, and respectful working conditions,
- Prevent and address psychosocial and physical risks in the workplace,
- Promote an inclusive environment free from discrimination and harassment.

This Policy supports BME's sustainability strategy and our responsibility as a respectful employer that places human dignity, well-being, and safety at the center of its operations.

SCOPE

This Policy applies to all BME operating companies and covers all employees, agency workers, temporary staff and contractors acting on behalf of BME. We also expect our suppliers, business partners and other parties within our value chain to act in accordance with the principles set out in this Policy and in our Supplier Code of Conduct. We are all responsible to follow these principles and integrating them in all activities and processes to live the BME values of Dare, Care, Do It, Be Real & Win Together. We emphasize in particular the value Care, which represents building lasting relationships, respect and care for people, communities, and the environment.

AMBITION

BME approaches human rights not merely as a compliance obligation, but as a foundation for responsible business conduct and long-term trust with our stakeholders. We recognize that human rights, labor rights, health and well-being stewardship is both a strategic opportunity to secure a great and safe place to work and to achieve good business results. Our ambition is to become the employer of choice in the building sector. We are committed to continuous, practical improvement. We hold ourselves to clear standards: every person working for or with BME should be safe, treated with dignity, and fairly compensated. Every supplier we work with should meet baseline human rights expectations, and those that fall short should be supported to improve or be replaced. We commit to being transparent about where we stand, honest about where we fall short, and consistent in our efforts to do better.

2. BME COMMITMENTS

The right to health and safety is an integral part of our human rights Policy. This Policy applies to all BME's operations and entities. As we operate in seven different countries, each with specific national legislation, every operating company has their own procedures in their local language on top.

HEALTH AND SAFETY

BME affirms that health, safety and well-being are integral to quality business operations and not merely a legal obligation. We pursue a risk-driven people strategy and continuous improvement in occupational health, safety, and well-being across all operations. To achieve this, BME:

- conducts systematic risk assessments of physical and psychosocial hazards,
- implements preventive measures based on the findings of those assessments,
- registers, investigates and analyses incidents and near-misses,
- monitors health and safety performance through defined indicators,
- provides a Health & Safety Compass program to guide employees in working safely and maintaining their health,
- cultivates a culture of safety feedback by maintaining consultation channels through which employees can raise concerns relating to health, safety, and well-being.

CHILD LABOR, FORCED LABOR, AND HUMAN TRAFFICKING

BME respects internationally recognized human rights and fundamental labor rights, including the principles established in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. We conduct appropriate risk-based due diligence to identify, prevent, and, where necessary, address potential negative impacts. To safeguard these rights BME:

- maintains a strict prohibition on child labor, forced labor and any form of human trafficking, both within its own operations and across its supply chain,
- employs workers only on the basis of voluntary and lawful agreements, ensuring that no identity documents are withheld and no form of coercion or undue pressure is applied,
- complies with all applicable laws regarding minimum age of employment,
- expects suppliers and business partners to uphold the same standards and to demonstrate active risk management where necessary,
- takes any signals or reports of potential risks seriously and is committed to investigating and addressing them.

DIVERSITY, EQUITY AND INCLUSION

BME is committed to equal treatment and to a workplace free from harassment, intimidation and inappropriate behavior. BME:

- guarantees equal treatment and support freedom of expression for all employees regardless of gender, transgender identity or other expressions, age, culture, nationality, ethnicity,

- social group, physical abilities, disabilities, hidden disabilities, political and religious beliefs, sexual orientation, marital status, or any other characteristic protected by applicable law,
- maintains zero tolerance for bullying, harassment, intimidation, or any form of violence in the workplace,
 - promotes diversity and inclusion in recruitment, development, evaluation, promotion, and remuneration,
 - provides accessible reporting channels for concerns relating to discrimination or inappropriate behavior,
 - guarantees protection against retaliation for anyone who raises a concern in good faith,
 - handles all reports carefully, objectively, and with appropriate confidentiality,
 - supports initiatives and gives trainings to raise awareness and to foster an inclusive culture.

EMPLOYMENT CONDITIONS

BME wants to be the employer of choice in its sector, ensuring fair and responsible employment conditions to all employees. This bold commitment takes time and open communication between management and employees. BME is committed to full compliance with applicable labor legislation and sectoral collective agreements in every country of operation.

- **Working hours:** We prioritize a healthy work-life balance as vital to employee well-being and as such a high priority. This includes the right to family-related leave, in full compliance with all applicable local legislation.
- **Fair remuneration:** We provide appropriate rewards to drive engagement and well-being. Across our seven Western European markets, we ensure adequate wages and are actively working towards full alignment with the principle of equal pay for equal work.
- **Equal treatment:** Leave, absence, and illness arrangements are applied consistently and without disadvantage. We acknowledge that our employees are fully supported by the social protection programs in their countries inherent to our Western European operations.
- **Annual employee engagement survey:** An employee engagement survey is executed annually to gain insights into employee morale and satisfaction, which is used as a tool for continuous improvement of our organization.

SOCIAL DIALOGUE

We respect the right of our employees to freely associate and bargain collectively in accordance with applicable legislation. BME maintains an open dialogue with employee representatives and involves employees in decisions that materially affect their working conditions.

CAREER DEVELOPMENT AND TRAINING

BME supports employees in their professional growth by means of structured training relevant to their role and responsibilities through:

- annual evaluation and development discussions in which competencies, performance, and ambitions are discussed,
- opportunities for additional training, task expansion, and internal mobility,
- strengthening critical skills that contribute to organizational continuity.



PRIVACY AND RESPONSIBLE USE OF DATA

BME recognizes that employees, customers and other stakeholders have a fundamental right to privacy and to the security of their personal data. In processing personal data, we comply with applicable international, European and national regulations, including the General Data Protection Regulation (GDPR). BME:

- protects personal data according to the principles of lawfulness, proportionality, and confidentiality,
- maintains appropriate measures for data management, access control, and information security to prevent unauthorized access, loss or misuse,
- expects all employees to use BME's IT and communication resources responsibly and professionally,
- acts transparently regarding the purposes of data collection, applicable retention periods, and the rights of data subjects.

VALUE CHAIN AND RESPONSIBLE BUSINESS

BME has chosen to integrate its commitments towards workers in the value chain into this Policy, rather than maintaining a separate Policy. This reflects our view that human rights obligations towards own employees and value chain workers are inseparable in practice.

BME pursues responsible procurement and supply chain management as a core expression of its human rights commitments. We recognize that our most material human rights risks lie upstream, in raw material extraction, logistics subcontracting and the use of seasonal or migrant labor, and we manage these risks actively. BME:

- communicates its expectations regarding human rights, labor rights, safety, integrity, and ethics clearly and systematically to all suppliers through our [Supplier Code of Conduct](#),
- selects suppliers based on objective and responsible criteria, taking human rights and labor standards into account alongside commercial considerations,
- applies risk-based due diligence that prioritizes suppliers and sourcing regions with the highest severity and likelihood of adverse impact, based on third-party ESG ratings, country risk assessments, industry benchmarks and spend analysis,
- monitors and evaluates suppliers through data, audits, or evidence,
- requests corrective action plans where concerns are identified and terminates cooperation in cases of persistent or severe non-compliance.

Our responsible procurement actions are further described in our [Procurement Policy](#).

LOCAL COMMUNITIES

As a distributor focused on warehousing and logistics within established industrial zones, BME regularly executes a Dual Materiality Assessment (DMA), which is a strategic process inside-out and outside-in used by organizations to identify which sustainability matters (Environmental, Social, and Governance) are most important to their business. The DMA has determined that BME's operations do not generate material impacts on local communities. While we acknowledge localized factors such as noise and traffic, our reliance on optimized logistics planning and compliance with environmental permits ensures that we maintain a stable social license to operate without triggering significant negative impacts. However, BME commits to:

- impact management: operational focus on noise reduction and traffic optimization to minimize emissions,
- engagement: open dialogue through standard business practices and a corporate whistleblower hotline for grievance reporting,
- local value: commitment to regional economic support through local employment and professional site management.

PRODUCT SAFETY AND CUSTOMER INFORMATION

As a partner to the construction industry, BME recognizes its responsibility to ensure that the products it supplies are safe, compliant, and accompanied by accurate information. Reliable products and transparent communication are fundamental to the trust our customers place in us, by:

- ensuring that products in their portfolio comply with all applicable safety, quality, and regulatory standards,
- providing customers with accurate technical documentation, product information, and instructions to support safe and correct usage,
- taking customer complaints and product safety notifications seriously, handling them carefully and promptly through established quality and customer service processes.

3. IMPLEMENTATION, MONITORING, AND REPORTING

ACCOUNTABILITY AND MANDATE

At BME, the accountability for the Human Rights, Labor Rights, Health, Safety and Well-being Policy lies with the Management Board and the Executive Management Team. The ultimate responsibility lies with the ESG Committee, which approves the Policy, defines its strategic direction and evaluates its effectiveness annually. The Management Board and Executive Management Team maintain oversight of Policy execution and review strategic progress on an annual basis.

OPERATIONAL GOVERNANCE

BME ensures implementation of this Policy through cooperation between the ESG Committee and the Group HR, Group Legal, Group Procurement and local operating company management. Each role is responsible for integrating the principles of this Policy into its relevant processes, decisions, and supplier relationships, which:

- oversees the implementation of action plans based on KPIs,
- reports periodically (at least quarterly) to management on progress, bottlenecks and required Policy adjustments,
- advises on priorities, objectives, and required resources.



RISK, OPPORTUNITY, AND IMPACT MONITORING

BME conducts systematic risk and impact assessments to identify, evaluate, and respond to human rights and labor rights risks across its operations and value chain. This process evaluates both BME's impact on people and the potential financial consequences for the business, in line with the principle of double materiality.

BME continuously monitors relevant developments, including changes in legislation, evolving stakeholder expectations, and sector-specific risk trends, to ensure that its risk picture remains current and that emerging issues are identified at an early stage.

MONITORING AND EVALUATION

BME conducts periodic internal evaluations to assess the progress and effectiveness of this Policy. Performance is monitored through a set of defined KPIs, reviewed at least annually by the Group ESG Director and reported to the Ethics & Compliance Committee.

Evaluation findings are used constructively. Where progress is insufficient or circumstances have changed, BME adjusts its action plans and priorities accordingly, reassesses relevant risks and opportunities, and updates the Policy itself where necessary. This cycle of review and improvement ensures that the Policy remains relevant, effective, and aligned with BME's obligations and stakeholder expectations over time.

ACTION PLANS AND RESPONSIBILITIES

BME establishes domain-specific action plans that set out concrete objectives, measurable indicators, clearly assigned responsibilities, and defined timelines. These action plans are reviewed and updated regularly to reflect progress and changing circumstances.

REPORTING AND TRANSPARENCY

BME reports internally to management and relevant decision-making bodies on Policy implementation. Externally, BME reports performance through its annual sustainability report, in accordance with the requirements of the Corporate Sustainability Reporting Directive (CSRD) and applicable European Sustainability Reporting Standards (ESRS), as well as through its EcoVadis assessment (one of the rating companies assessing supply chain-focused ESG risks and compliance). External assurance is conducted on sustainability reporting in line with applicable legal requirements.

POLICY REVIEW

This Policy is reviewed at least every three years, or sooner in the event of material changes to BME's operations, applicable legislation, or stakeholder expectations.

WHISTLEBLOWER

We strongly encourage any ethical or legal misconduct or violations of this Policy to be reported to the relevant BME and/or affiliated operating companies. BME has installed a BME Speak Up Hotline and an online anonymous reporting tool – supported 24/7.



Whistleblowers are invited to report the violations following BME's Whistleblower Policy.

Reports are managed in an incident management system, which is managed by BME Group Legal for assessment and further distribution – safeguarding confidentiality.

REMEDIATION

BME is committed to providing or facilitating appropriate remediation where it has caused or contributed to an adverse human rights impact. Where an impact is identified, BME will:

- assess the nature and severity of the harm and determine BME's relationship to it,
- engage with affected individuals or communities in a respectful and transparent manner,
- take proportionate corrective action and, where appropriate, support access to remedy through grievance mechanisms or third-party non-judicial processes.

BME will not obstruct access to remedy and is committed to participating in initiatives that improve access to remedy for affected parties.

4. DEFINITIONS

CBA	Collective Bargaining Agreement: a legally binding written contract between an employer (or a group of employers) and a labor union or employee representative group.
UNGPS	UN Guiding Principles on Business and Human Rights: Endorsed by the UN in 2011, these are the global standard for preventing and addressing the risk of adverse impacts on human rights linked to business activity.
OECD GUIDELINES FOR MULTINATIONAL ENTERPRISES	<p>These are far-reaching recommendations addressed by governments to multinational enterprises operating in or from adhering countries.</p> <p>Scope: They cover areas such as disclosure, human rights, employment relations, environment, anti-bribery, and taxation.</p> <p>Mechanism: Unlike the UNGPs, these have a unique grievance mechanism called National Contact Points (NCPs), where individuals or NGOs can file complaints against companies for non-compliance.</p>
DMA	Dual Materiality Assessment: a strategic process used by organizations to identify which sustainability matters (Environmental, Social, and Governance, or ESG) are most important to their business. DMA looks both from an impact materiality (inside-out), as from a financial materiality (outside-in)

5. DOCUMENT MANAGEMENT – INFORMATION SHEET

Owner	Group ESG Committee
Reviewer(s)	Group ESG Director
Approver(s)- accountable	Group CEO
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