

Sustainable procurement policy

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I. Scope, purpose, ambition, and definition of key supplier

Lamifil nv conducts its activities as a reliable partner within the value chain. This policy sets out the framework through which Lamifil manages risks, takes preventive measures, and reports transparently on the objectives defined across these areas.

Scope

This policy applies to all of Lamifil's employees, managers, directors, and board members, as well as to suppliers and partners acting on behalf of Lamifil or generating impact within the value chain.

The policy applies to all phases of the procurement process: tender, selection, contracting, ordering, monitoring, evaluation, and termination of the relationship.

The policy is closely linked to the Code of Conduct for Suppliers, which must be endorsed by every key supplier.

Purpose

Lamifil aims to be a reliable and trustworthy partner for all its stakeholders. The company therefore engages in regular dialogue with them to understand expectations and identify concerns to integrate into policy implementation and prioritization. This requires everyone to behave responsibly, within an established framework of agreements, and to act and communicate transparently and fairly with all stakeholders.

The purpose of this policy is to ensure a transparent, ethical, and sustainable procurement approach that:

- + Safeguards business continuity
- + Manages risks in the value chain
- + Supports Lamifil's ESG objectives
- + Complies with all relevant national and international laws and regulations, including environmental, social, and ethical standards and guidelines

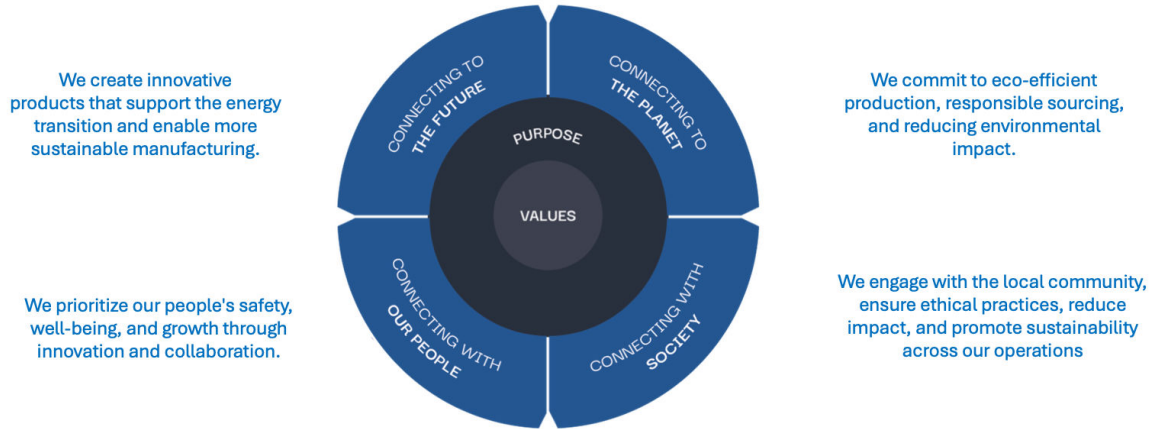
This policy supports Lamifil's sustainability strategy, reputation, and societal role as a reliable, ethical, and responsible company within the value chain.

Ambition

It is everyone's responsibility to safeguard the reputation and continuity of the business, and to act in accordance with the societal and legal obligations arising from applicable Flemish, Belgian, and European regulations – based on international guidelines.

Lamifil considers environmental, social, and governance (ESG) priorities not merely as an obligation, but as a strategic driver for innovation, resilience, and sustainable growth. By identifying risks and opportunities at an early stage, we can strengthen our operations, enhance our competitiveness, and help shape the sustainable transition of our sector.

Our ambition is built on four pillars:



We aim to be a reliable and responsible partner within the value chain. Lamifil commits to:

- + Embed sustainability and integrity in all procurement decisions
- + Actively engage suppliers in our ESG strategy
- + Promote circularity, safety, human rights, and innovation
- + Identify and manage supply chain risks at an early stage

Definition of key supplier

Within the procurement policy, key suppliers are defined as suppliers that – due to their impact on Lamifil's operations and strategy – require particular attention and monitoring.

A supplier may be classified as a key supplier based on one or more of the following criteria:

- + Volume of goods and services: suppliers that represent a significant share of Lamifil's total spend
- + Raw materials and ESG impact: suppliers of raw materials or components that have a significant impact on production continuity, or are subject to ESG criteria that are critical to the sustainability of Lamifil's operations
- + Single-source suppliers: suppliers that constitute the sole source for critical goods or services, where alternatives are not readily available
- + Capex investments: suppliers involved in major capital expenditure (Capex) projects with significant financial impact

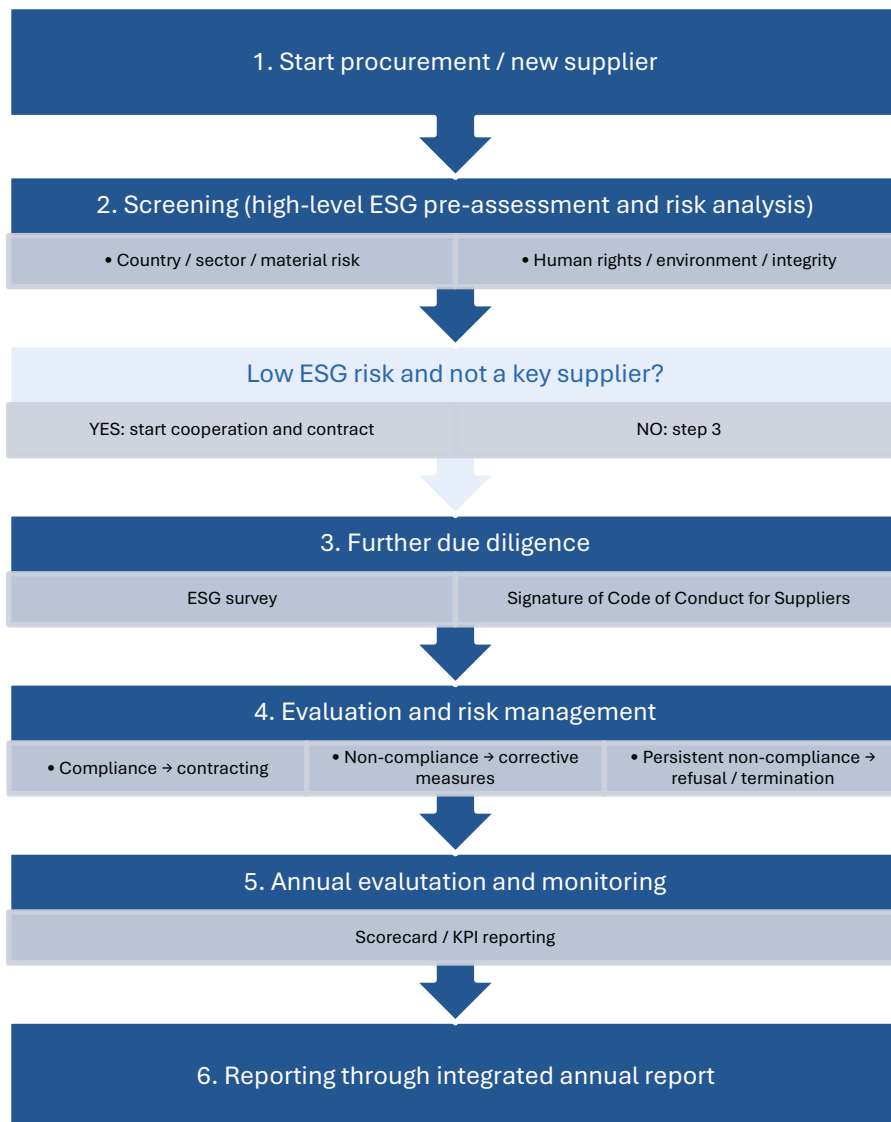
II. Commitments

Due diligence and risk management in the value chain

Lamifil applies a risk-based due diligence approach based on the OECD Guidelines for Multinational Enterprises. The company therefore:

- + Conducts risk assessments on key suppliers as well as at product level
- + Systematically assesses social, safety, human rights, and environmental risks in addition to commercial conditions and supply reliability

- + Requires compliance with the Code of Conduct for Suppliers, demonstrated through signature, self-assessments, certificates, or audits. This commitment must be renewed every five years, or upon each update of the Code of Conduct for Suppliers
- + Carries out periodic evaluations or audits on key suppliers with elevated risk to verify compliance
- + Supports suppliers in improving their ESG performance through knowledge sharing, training, and joint improvement projects, where possible and relevant
- + Defines actions in cases of non-compliance, including guidance, escalation, or termination



This due diligence process forms the foundation for risk-based supplier management.

Environment and circularity

Suppliers are encouraged to:

- + Reduce emissions and energy consumption
- + Seek circular solutions
- + Optimize the use of materials
- + Integrate environmental management principles in line with ISO 14001

Human rights and social standards

Suppliers are expected to:

- + Comply with the principles of the ILO, UNGP and OECD Guidelines
- + Not permit child labor or forced labor
- + Ensure fair working conditions
- + Safeguard health and safety
- + Provide access to reporting channels and protection for whistleblowers

Integrity and transparency

Lamifil does not tolerate bribery, conflicts of interest, or undue influence. The company therefore:

- + Ensures transparent decision-making
- + Evaluates and monitors suppliers from an ethical perspective
- + Terminates contracts in cases of fraud or breaches of integrity

Reporting mechanism / whistleblower system

In line with existing reporting policies and the EU Whistleblower Directive, Lamifil provides:

- + Clear and reliable reporting process for breaches of legislation, internal policies, integrity rules, or ethical standards
- + Possibilities to submit reports both internally and externally
- + Follow-up by an independently appointed reporting manager
- + Registration, analysis, and reporting of incidents in accordance with established procedures

The reporting mechanism is an essential component of sound governance and risk management. Lamifil uses Phronesys as its whistleblower platform.

Escalation processes

Lamifil applies a structured process for managing incidents. The company therefore:

- + Records, classifies (minor/major), and evaluates incidents based on their severity and recurrence
- + Requires suppliers to propose and implement corrective actions within a reasonable timeframe, in cases of non-compliance
- + Monitors and verifies the progress of corrective actions
- + Suspends or terminates the relationship in cases of serious or repeated violations, or where an adequate response is lacking
- + Documents decisions regarding escalation transparently; these are then assessed by the Sustainable Procurement Steering Group

High-risk materials and regions

Lamifil pays particular attention to raw materials and regions with an elevated risk of human rights violations or conflict financing. The company therefore:

- + Identifies materials that may originate from conflict-affected or high-risk areas
- + Requires suppliers of critical raw materials to provide transparency regarding origin and due diligence
- + Works towards traceability where this is proportionate and feasible

III. Implementation, monitoring, and reporting

Lamifil ensures the implementation of this policy through close cooperation between the Board of Directors, management, Sustainable Procurement Steering Group, and EHSQ & Sustainability Manager. The Board of Directors provides strategic direction; management ensures implementation; and the EHSQ & Sustainability Manager oversees operational execution.

In practice:

Ultimate responsibility and mandate

Lamifil assigns ultimate responsibility for this policy to management, which adopts the policy, makes strategic choices, and evaluates policy effectiveness at least annually.

The Board of Directors oversees the implementation of this policy and evaluates strategic progress annually.

Operational management

Lamifil appoints the Sustainable Procurement Steering Group under the leadership of the Finance Director, supported by the Procurement Manager and EHSQ & Sustainability Manager. The steering group:

- + Works with standardized supplier scorecards that systematically assess ESG criteria (environment, safety, labor rights, ethics) in addition to commercial performance (quality, delivery, price)
- + Conducts annual evaluations of key suppliers
- + Maintains traceable records of decisions and reports
- + Oversees the implementation of action plans based on KPIs
- + Reports periodically (at least quarterly) to management on progress, bottlenecks, and necessary policy adjustments
- + Advises on priorities, objectives, and resources required

Monitoring of risks, opportunities, and impacts

Lamifil conducts systematic risk and impact assessments through its risk management system and compliance monitoring process. These assessments evaluate both the impact of the organization's procurement decisions on suppliers, human rights and the environment in the value chain, and the financial and reputational risks of value chain-related issues on the business (double materiality).

Lamifil continuously monitors relevant developments, including legislation, stakeholder expectations, and operational changes.

Monitoring and evaluation

Lamifil conducts periodic internal evaluations of the progress and effectiveness of this policy.

Lamifil applies a structured process whereby evaluation findings lead to:

- + Adjustment of action plans and priorities
- + Reassessment of risks and opportunities
- + Revision of the policy itself, where necessary

Action plans and responsibilities

Lamifil develops domain-specific action plans with concrete objectives, indicators, responsibilities, and timelines.

Lamifil updates these action plans regularly, based on progress and changing circumstances.

Reporting and transparency

Lamifil reports internally to management and relevant decision-making bodies on policy implementation.

Lamifil reports externally through its annual integrated report in accordance with CSRD (ESRS standards) and other relevant frameworks, such as EcoVadis.

External assurance is performed on Lamifil's integrated reporting in accordance with legal requirements.

IV. Review

This policy is reviewed at least every three years to maintain alignment with changing regulations, international standards, stakeholder expectations, and evolving business needs.