



Code of Conduct

In this document Royal Vaassen (meaning all employees and/or entities acting under its name) describes its rules of conduct; the ethical principles that form the basis for the business conduct of all companies of the group and all its employees. In its efforts to achieve quality in every respect, Royal Vaassen focuses not only on its business commitments but also on its responsibilities towards the community at large.

Royal Vaassen wishes to be clear about its strategy and the direction it follows in implementing it, but also about its standards and values. Due to the increasing importance society attributes to these business standards and values, they have been made more explicit and stringent, Royal Vaassen regards it as important to summarise its rules of business conduct in a way that is clear, easy to understand and as concise as possible. That is the purpose of this memorandum.

The rules of conduct have been defined as clearly as possible, so that the responsibility for their observation can be shared by each individual Royal Vaassen employee. Nonetheless, situations will undoubtedly arise within the dynamics of everyday business for which the rules described here do not give the appropriate answer, or in which they leave room for interpretation.

In these situations, two things should be borne in mind:

- If for whatever reason the literal observation of the rules does not offer a solution, the spirit of the rules and the interests of the company should be the primary considerations in the choice of the action to be taken *“Common sense prevails”*.
- If there is any doubt about how to act or behave, first discuss the relevant issues with colleagues from higher Royal Vaassen management

In this way, Royal Vaassen - in the interests of customers, shareholders, suppliers and employees - will remain, as it is now, a company that always acts with care and integrity.

1. Respect the law

- If these laws clash (at home and abroad) or if they are at odds with the Royal Vaassen Rules of Conduct or Values, seek higher management counsel.
- Provide for adequate legal advice.
- Do not interpret or circumvent any clear and undisputed law.

2. Take care of safety and health

- Of customer personnel, of Royal Vaassen personnel and of the public as exposed to Royal Vaassen products, services and manufacturing.
- Observe adequate safety procedures and health care rules at all times.
- Steer away from toxic and dangerous materials and processes, test products and constructions before releasing them.
- Provide for sound insurance of Royal Vaassen personnel and for customers, consumers or public liability claims.





3. Human Rights

- No distinction is made in appointments, remuneration or other matters on the basis of gender, orientation, race or religion.
- There is no (modern) slavery or child labor, nor does Royal Vaassen accept any violations in the field of (modern) slavery or child labor whatsoever.
- There are decent working conditions, so that employees have access to drinks, a place to have lunch, decent toilets, etc.
- There are confidential counselors inside and outside Royal Vaassen, who can also be approached with reports of a more confidential nature. The names are published on the homepage of the intranet. In addition, we have a separate whistleblower scheme for reports of abuses internally or externally.
- We have respect for each other. This means that any form of intimidation or abuse of power (mental, physical, sexual) is experienced as unacceptable.

4. Protect the environment

- Do not add to air, water or earth pollution beyond the limits of what is unavoidable and allowed by any measures which are within your area of competence.
- Be aware of, and communicate to customers and users of Royal Vaassen products and equipment, potential dangers to the environment caused by irresponsible use of such.
- Observe local environmental standards or internationally accepted standards, whichever are higher.

5. Apply sound business practices

- Do not solicit or suggest, seek or offer, accept or pay any form of bribe, material or in any other way.
- Make sure all of Royal Vaassen's disbursements, direct or indirect, now or later, concerning a customer's order, benefit that customer only, and no one else, except legitimate intermediaries.
- Keep records, and report such, of all expenditures made in view of securing an order.
- For those who extend contracts on Royal Vaassen's behalf, for buying, procuring, or products being made or constructed, the same rules hold in reverse.
- Make sure that your joint venture partners, subcontractors, agents and representatives maintain the same rules of conduct.

6. Deal responsibly with governments

- Observe all laws, rules and regulations put out by a legitimate body of government, recognised by the international community of nations.
- Do not get the company involved in local politics, financially or otherwise.

7. Choose respectable business partners

- This holds for principals, customers, suppliers, subcontractors, agents, representatives and joint venture partners.
- "Respectable" meaning: Healthy financial track record, sound business practices, management with a clean legal record, and a code of ethics not differing substantially from Royal Vaassen's.
- Check credentials of any new substantial business partner.
- Put all major contracts, agreements, and understandings in writing so that continuity can be guaranteed.
- If and when a business partner willingly violates the law or a substantial rule of conduct, as observed by Royal Vaassen and its key customers, freeze the relationship and seek higher management counsel as to termination.





8. Observe responsible labour policies

- Do not discriminate remuneration by sex, race or religious denomination for positions of equal importance.

8. Serve vital community interests

- Pay local taxes in good time.
- Cultivate a friendly and helpful relationship with the local community.
- Support local initiatives, such as community chests, charity drives, sport and culture events, with your reasonable means as a local employer.
- Stay out of local politics.
- Observe strict safety, health and environment protection rules in your local plant.

10. Maintain full accountability

- Maintain sound and updated records - administrative, financial, operational and businesswise.
- Write down all vital procedures governing your administration, operations and business transactions, and always keep a copy of this set of procedures available.
- Give free access and full support to CPA's and others if necessary, both for regular reporting and spot audits.
- If fiscal reporting differs from internal (corporate) reporting, maintain a clear record of the nature, size, time span and causes of such differences.
- If reported costs and expenditures for any given client or order differ from actually disbursed costs and expenditures, a clear record should be kept of the nature, size, time span and causes of such differences.
- Of that which cannot be officially reported in writing, for instance in case of political turbulence, calamity or liability, inform responsible higher management in a full and open way.
- Always maintain open lines of communication with the Royal Vaassen network, and with your customers.

