

Code of Conduct

for stakeholders of the Van der Knaap Group (VDKG)

Each of VDKG's stakeholders, such as suppliers, distributors, agents, resellers, joint venture partners, customers and strategic partners, is recognised as an important member of the worldwide team contributing to VDKG's success. Our aim is to develop relationships with stakeholders who share common corporate values with VDKG and conduct business in an ethically responsible manner.

VDKG supports the United Nations sustainable development goals and adheres to endorsed international standards in key areas, such as international human rights, business ethics and working conditions. VDKG expects its stakeholders to uphold similar standards and to require the same from their own stakeholders, especially those partners that conduct business for VDKG.

VDKG expects immediate notification from existing stakeholders of any suspicion or concern of breaches, or any other non-compliance with the standards set out in this document, allowing for joint verification of facts and remediation. This applies to both VDKG stakeholders and their subcontractors.

Failure to comply with this Code of Conduct for VDKG Stakeholders may result in discontinuance of business relationships with immediate termination rights.

1. Respect for people, human rights and appropriate working conditions

• Safe and healthy work environment

VDKG expects its stakeholders to offer their employees a safe and healthy workplace in keeping with international standards and national laws.

• Discrimination

VDKG takes the issue of discrimination very seriously. We demand that all employees in our joint ventures are treated with respect and dignity and that equal opportunities are offered based purely on merit, irrespective of race, skin colour, religion, gender, age, national origin, sexual orientation, civil status or disability. VDKG stakeholders must provide a fair working environment and comply with all applicable local laws concerning discrimination in hiring and employment practices. This includes equal pay for equal work and other initiatives aimed at preventing labour breaches or unwanted effects of those.

• Child or forced labour

VDKG will not use involuntary labour, bonded or forced labour, and does not accept anyone doing so on its behalf. Any use of child labour by stakeholders must comply with internationally recognised standards, such as the guidelines of UNICEF and the ILO, as well as local legislation.

• Freedom of association and collective bargaining

VDKG expects stakeholders to respect their employees' right to freedom of association. Their employees must have the right to collective bargaining in keeping with the applicable laws and regulations.

2. Protection of the environment

• Environmental impact

Stakeholders are encouraged to develop and implement an environmental policy and to operate in compliance with all applicable laws and regulations on environmental protection. VDKG encourages stakeholders to develop and use environmentally friendly technologies, products and services.

3. Ethics and business integrity

• Bribery and corruption

VDKG expects its stakeholders to uphold the highest standards of business ethics, to respect local laws and not to engage in any form of corruption, bribery, fraud, facilitation payments, kickbacks, illegal donations or extortion. VDKG regards facilitation payments as a form of corruption and has a zero-tolerance policy in respect of such payments.

• Money laundering

VDKG conducts business with a high degree of integrity and within the limits of laws and regulations. We will not allow our stakeholders to condone or support money laundering in any form and at any location on VDKG's behalf.

• Business gifts and hospitality

VDKG's main rule is that we prefer not to give or receive gifts. VDKG employees are not permitted to offer gifts, except promotional items without any commercial value. VDKG employees will not try to influence others or be influenced by others by offering or accepting gifts and/or hospitality.

• Fair competition

VDKG strictly prohibits anti-competitive agreements or practices, such as fixing prices, restricting the supply of goods or services, bid rigging and market sharing. We require our stakeholders to commit to free and fair competition and to comply with the relevant competition laws and regulations.

• Confidential information

VDKG makes every effort to protect confidential, sensitive and personal information. Stakeholders are expected to comply with all applicable laws and regulations on the protection, use and disclosure of VDKG-specific, confidential and personal information.

• Conflicts of interest

VDKG expects its employees and stakeholders to immediately disclose and address situations where there is an actual, potential or perceived conflict of interest, or even the appearance of a conflict of interest.

4. Misuse of products

In line with our commitment and strict adherence to the applicable legal and regulatory obligations, VDKG will not tolerate the misuse of its products for illegal purposes. Among other things, this involves the misuse of final products, semi-finished goods and raw materials for the production of illegal drugs and illegal explosives. In our resolve to reinforce our legal and regulatory frameworks, VDKG continuously makes its stakeholders aware of their obligation to use adequate monitoring systems within their logistics chains to ensure that misuse is prevented, or can be detected and remediated immediately.