

## Introduction

This Code of Conduct describes how bv Vormenfabriek Tilburg takes responsibility for its actions. It is an ethical and legal framework for our day-to-day work, so that we can better deal with difficult situations when it comes to human rights, working conditions and fair practices.

We trust that everyone uses their common sense and puts themselves and bv Vormenfabriek Tilburg in a positive light with their actions. Together we must safeguard this reputation. We are all responsible for complying with the Code.

The Code does not contain detailed regulations for every situation we may encounter, but it does provide guidelines for conducting ourselves correctly every day.

## Our values

### **Innovation**

We are creative and we like to solve problems in new ways. We have very talented employees, beautiful products, an unbiased approach towards suppliers and customers, each with complex and unique challenges.

### **Integrity**

We keep our promises and only promise things that we can deliver. In everything we do we are friendly, accessible and practical.

### **Teamwork**

We know exactly what our customers, suppliers, colleagues and the community expect from us. We work together to achieve great results.

### **Customisation**

We fully cooperate with our customers and suppliers to meet their unique requirements.

### **Quality**

We are known and recognised as an international supplier of high-quality products and services.

### **Strength**

We want to exceed our financial performance, but also the expectations of our customers, our colleagues and other stakeholders. We give our employees the opportunity to develop themselves and we hire new employees with skills that add value. Together with our customers and agents we aspire to grow worldwide.

### **Vision**

We think about the future, so that we can respond to changes. We are working hard on shaping our future.

## Code of Conduct

Note: with "we", "our" and "us", reference is made to bv Vormenfabriek Tilburg. "You" and "your" refers to the employee or other readers of the code.

This Code of Conduct (or Code) translates our corporate values into general rules of conduct. These are applicable to all business activities. The code applies to all employees and third parties acting on behalf of bv Vormenfabriek Tilburg.

### **1. Discrimination**

1.1. We have an anti-discrimination policy in the broadest sense of the word. This includes, but is not limited to nationality, religion, age, gender, physical limitations, sexual inclination, marital status, political preference when hiring employees, compensation policy, access to training, promotions and termination of an employment contract.

### **2. Freedom of employment**

2.1. Employees have freedom of employment in which there is no compulsory, forced or non-voluntary employment relationship. We act in accordance with the laws and regulations under Dutch law. Employees are therefore free to leave our company, taking into account the applicable notice periods.

### **3. Child labour**

3.1. We are against the abuse of children for labour. We will contribute and participate in any programs that are against child labour. Young adults under the age of 18 are not allowed to work night shifts and will not be placed in dangerous situations.

### **4. Employees**

#### **4.1. Respect, equal treatment and health & safety**

We are candid and honest to our employees about everything that has to do with your employment, workplace and professional development. We are against hard or inhuman treatment as well as against the abuse based on sexual or physical activities, mutual respect is the basis on which we work. We do not discriminate you or applicants on the basis of properties protected by the Law. We also do not tolerate discrimination by our employees. We will protect you from risks to your physical, mental and social well-being, and uncontrolled health and safety risks at work. Adequate solutions are taken to prevent accidents in work related situations. We comply to standards in terms of workplace support. Knowledge and development are based on periodic training based on health and safety, continuously developed for existing and new staff members. Furthermore we also will protect our customers, the public and the environment when they use our products and services.

#### **4.2. Salary and working hours**

On commencement of employment all employees receive, on predetermined times, a salary commensurate with their position which at least meets the legal requirements or the collective labour agreement structure. Financial disciplinary measures are not supported by us, except those permitted by law, but are always taken in consultation with the employee. Working weeks, working hours and the associated agreements are followed up based on the legal frameworks and agreements which are laid down in the collective labour agreement.

#### 4.3. Dealing with unions

We believe that employees should feel free to join a union or to form a union to safeguard their rights. This is also supported by the organisation. Union representatives are treated openly and constructively, so that their work can be done to the best of their ability.

#### 4.4. Employee privacy

We collect personal information from our employees so that we are able to execute processes and procedures as effectively as possible. We observe the applicable data protection laws and regulations. Only authorised persons can use this data on a need-to-know basis. Only with your permission, we disclose personal information to third parties. An exception is if we are required by law to do so. Do you as an employee have access to personal data of other employees? Then you have to do everything to ensure that this information is not published or read without authorisation, which is a violation to the right of privacy of employees, legislation or company policy. Please check HR policy and other policies about protecting personal data if you are looking for more information regarding this topic.

#### 4.5. Conflict of interest

Personal considerations do not affect your business decisions. Avoid all activities that may conflict with your responsibilities and loyalty to the company. Employees, family members and other third parties should not take advantage of their position as a result of a conflict of interest.

#### 4.6. Insider trading

During your work for bv Vormenfabriek Tilburg you can come into contact with undisclosed information about bv Vormenfabriek Tilburg or its affiliates. You may absolutely not use this information for personal benefit or for third parties. If you do so, you are committing a violation of the law.

#### 4.7. Social Media

If you use Social Media, then deal with it professionally towards bv Vormenfabriek Tilburg. Make no comments which can offend or harm our organisation, business operations, employees, colleagues, competitors or customers.

### 5. Customers, competitors and third parties

#### 5.1. Data protection, information security and privacy

We protect confidentiality of information, but also of personal data, integrity and availability in accordance with applicable laws and regulations and contractual obligations. It is important that we protect this data from unlawful access. We may only use them for the purposes for which they were collected and / or additionally processed. Our protection measures apply to all actions we perform with personal data, in particular for receiving, collection, use, transmission, processing and storage of personal data.

#### 5.2. Company Information

All information about our organisation that is not known to the public is company information. This information includes our existing and future products, services or investigations, our business plans, commercial activities, expectations for the future, our sales and other financial information. This also applies to data on personnel, including organisational changes and our software. You may only disclose this information with the permission of the management. You have to follow organisational measures to protect this information.

### 5.3. Anti-bribery and corruption

Bribery or corruption occurs when someone receives, gives, promises something of value, approves, or offers to gain or maintain a commercial advantage. Also, when you encourage or reward inappropriate behaviour on the part of the recipient, you commit it yourself. In a business relationship, this is called bribery. In a business relationship with the government this is called corruption. We do not tolerate bribery or corruption under any circumstances.

### 5.4. Gifts and entertainment

We allow commercial promotional gifts and entertainment. They should be reasonable of nature, not frequent and not too expensive. E.g. a lunch, dinner, sports or cultural event, or gifts of reasonable value.

### 5.5. Money laundering

The hiding of funds originating from illegal activities is called money laundering. The appearance is created that these funds come from legitimate sources. We do not enable nor tolerate it. We are only allowed to make and receive payments through confirmed processes and channels. These payments must be properly registered.

## 6. Financial Integrity

### 6.1. Accounting and administration

Our organisation's records and accounts must accurately, completely and reliably reflect our transactions to a reasonable level of detail. Following our accounting and policy rules are a must.

We formally record all agreements with third parties in written contracts or equivalents. The contract or agreement must have a clear description containing the activities to be performed or to be provided.

### 6.2. Company Assets

Illegal and inappropriate use of our company assets is prohibited. It is critical that corporate assets are protected. This is especially true for intangible assets, such as customers and intellectual property. You are personally responsible for this.

## 7. Not sure if you are breaking the Code?

If you are unsure whether you are violating our Code with your behaviour or planned activities, ask yourself the following questions:

- \* Would you be happy if law enforcement, competition authorities or other third parties investigated your actions?
- \* Would you be comfortable if your actions were discussed online, on television or in a newspaper?
- \* Would you feel comfortable explaining your actions to your manager?
- \* Would your manager or colleagues be following the rules if they acted this way?
- \* Would you be comfortable if you had to tell your family about what you did?

If you answered any of these questions with "no," then you are probably breaking our Code. You better change your planned action.

Do you want to talk about whether certain behaviour is allowed? Would you like advice on applying our values and rules? Then ask your manager or HR employee for advice.

## 8. Responsibility

Our management has drawn up and approved this Code. You are responsible for complying with this Code. Management is responsible for periodically updating the Code and HR employees are responsible for bringing the Code to the attention of the employees.

## 9. Code violation

Violating the Code can result in disciplinary action. We always ask you to report misconduct immediately. The Code prohibits retaliation against anyone who reports problems or misconduct in good faith and who assumes the information is accurate.

To all our offers, agreements and contracts concerning deliveries and/or services the general conditions of sales and delivery for the Mechanical and Electrical Engineering Industry apply, by the Association FME-CWM on 19 October 1998 shelved at the district court in The Hague (no. 119/1998). A copy will be available on request. Any other conditions are herewith explicitly rejected by us.

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