

Care for tomorrow



Vreugdenhil
Dairy Foods

Code of Conduct Vreugdenhil Dairy Foods



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Versie 4 (1-2024)

This document is intended for employees of Vreugdenhil Dairy Foods (VDF), third parties carrying out work on behalf of Vreugdenhil, or persons who are directly managed by Vreugdenhil employees.

Vreugdenhil operates in the global market for functional and nutritional powders. We are the preferred supplier in this market. Vreugdenhil is committed to doing business with integrity and honesty, based on the law and our standards and values. Vreugdenhil attaches great importance to a safe and healthy working environment, in which it is important that every employee feels safe and is treated with respect. What we consider important for good conduct is set out in this Code of Conduct (code). This document replaces our current Code of Conduct.

Health and safety

Health and safety are always paramount at Vreugdenhil. Nothing is more important than the safety of our people and our products. The company provides a safe and healthy working environment. Whether we are at our workplace, visiting websites, meeting customers or travelling, we must always follow the safety rules and procedures. Speak up if safety rules and procedures are not being followed. Make sure you know what to do if an emergency occurs at your workplace or at any place you visit. Report any accident, unsafe situation or near miss.

Human rights

We conduct business with respect for the fundamental dignity of people and their human rights. This is embedded in our policy and in the commitments we have made with regard to international standards. We expect you to adhere to our established human rights standards. We encourage you, our customers, suppliers and other business relations to report (anonymously) if you observe or suspect possible human rights issues. More information can be found in our document on human rights policy. See also our website:

<https://www.vreugdenhildairyfoods.com/conditions>

Respect and honesty

Honesty and respect are essential in our interactions and communications with each other. Expressions or actions that create an unsafe or hostile working environment and that can be considered offensive, (sexually) intimidating, malicious or insulting and/or aimed at excluding colleagues will not be tolerated.

Unwanted behaviour occurs directly or indirectly when: verbal, non-verbal or otherwise physical, digital, telephone or (digital) text, speech, image or video messages affect the personal integrity of another person.

Unwanted behaviour includes:

- Sexual harassment: any unwanted sexual advances in the form of requests for sexual favours or other verbal, non-verbal or physical behaviour with a sexual connotation, which has the purpose or effect of violating a person's dignity, in particular when a threatening, hostile, offensive, humiliating or hurtful situation is created.

- Physical sexual harassment ranges from grabbing someone or blocking their path to sexual assault and rape.
- Harassment: behaviour that has the purpose or effect of violating a person's dignity and creating a threatening, hostile, offensive, humiliating or offensive environment.
- Aggression and violence: aggression and violence can be broadly divided into three forms. 1) Verbal aggression (swearing, shouting or arguing very heatedly). 2) Physical aggression (kicking, pushing, hitting, spitting, biting, destroying property). 3) Psychological aggression (threatening, intimidating, blackmailing or humiliating someone verbally or in writing). The definition of aggression and violence also includes offences and crimes, as referred to in the Dutch Criminal Code (WvSR).
- Bullying: bullying is undesirable behaviour by one or more people directed at a person or group of people and can take many forms. From derogatory comments to open criticism and intimidation, from jokes to physical violence and from gossip to isolation and cyberbullying.
- Discrimination: making statements about, performing actions towards, making decisions about a person, or making distinctions based on religion, beliefs, family situation, political affiliation, race, gender, sexual orientation, marital status, skin colour, origin, nationality, (physical or mental) disability, age or any other personal characteristics.

Employees who believe that their workplace does not comply with the above principles are encouraged to raise this issue (anonymously, if possible) with their manager and/or the Human Resources department. Employees can consult the confidential advisor and confide in them in the event of undesirable behaviour, conflicts or suspected misconduct. More information can be found on My Vreugdenhil.

Environment

We believe it is our responsibility to actively reduce our impact on the environment. It is our ambition to grow our business with respect for people and the planet. We also focus on reducing waste through recycling and reuse. We expect you to contribute to these ambitions and encourage you to introduce, develop and improve sustainable initiatives in your daily work. We ask everyone to report situations or decisions that are contrary to our company's sustainability strategy and that worsen our impact on the environment.

Bribery

It is our principle never to accept, give, offer, promise or authorise bribes to anyone, anywhere or at any time. By bribery, we mean giving or receiving anything of value to or from a person, government officials or commercial parties, in order to obtain or retain business, influence decisions or secure an improper advantage in business operations. Be vigilant and always follow local laws and appropriate policies when providing anything of value, such as gifts, entertainment, hospitality and charitable donations. Gifts, whether offered or accepted, that have a value of more than £100 will not be accepted or offered unless approved by your manager.

Conflicts of interest

We each have a responsibility to make decisions in the best interests of our company, without being influenced by personal considerations. It is important to avoid situations in which a conflict could arise between the company and your personal interests. Even the appearance of such a conflict must be avoided. If a conflict of interest could exist or appear to exist, be transparent and discuss this with your colleagues, manager or confidential advisor.

Business relationships

We believe it is important to work with customers, suppliers and other business partners who share our values and commitment to responsible business practices. We expect our customers and other business partners to act with integrity and fairness, comply with local laws and behave in a manner consistent with this code. In addition, suppliers are expected to comply with our supplier code. We encourage you to report any suspicions or doubts you may have about misconduct by our business partners.

We encourage our customers, suppliers and other business partners to report any possible violations of local law and this code.

Use of company resources

Wherever we work and whatever our role, we are entrusted with numerous company resources. These include laptops, IT systems, mobile phones, tools and inventory. We are all required to use them carefully and professionally for their intended business use.

Fraud

Fraud can cause significant damage to our company's reputation, with the potential for a considerable financial impact. To protect the interests of all stakeholders, it is essential that we are alert to fraudulent behaviour. Fraud covers a very wide range of activities. Examples of fraud include falsification of documents, misappropriation of company assets, theft and deliberate misapplication of internal rules. Inaccurate information can mislead or deceive both internal and external stakeholders, which can have serious consequences for our company. We all have a duty to ensure that our financial data and public reporting accurately reflect our transactions and activities. We expect you to be alert to fraud and to report any suspicions to your manager or the confidential advisor. See also our whistleblower policy, which can be found on MijnVreugdenhil.

Privacy and data protection

We respect and protect the privacy of all individuals. We make every effort to comply with all relevant privacy requirements of the countries in which we operate. It is therefore important that we all ensure that we treat personal data with care and use it only for legitimate business purposes, in accordance with local legislation and our own privacy rules. If you are involved in the development or sale of products, you must be aware of our intellectual property rights and protect them, and respect the intellectual property rights of third parties. In our daily work, we also handle all kinds of confidential information. Examples include budget and audit reports, company recipes, business plans, strategies, innovations, agreements and financial statements. It is essential that we respect and protect our company's confidential information and only share

and use it to the extent permitted. This also applies to confidential information belonging to others.

Responsible communication

To protect our company's reputation, we must ensure that we always communicate in the right way, in the right place, at the right time and to the right target group. When communicating externally, or requesting a speaking confirmation on behalf of our company, we expect you to follow our internal policy and act as a Vreugdenhil ambassador. External online and offline communications about our company must be coordinated with the communications department. Remember that any online communication, including social media, that refers to our products and/or our company can affect our company's reputation. When using social media, both inside and outside of work, do so responsibly, always using common sense and professional judgement.

Your responsibilities

We expect you to always act in accordance with the law, our code and the underlying policy. Whenever laws, regulations or agreements are more restrictive, they take precedence. We expect everyone to promote a culture of openness, in which we all feel comfortable asking questions, raising dilemmas and expressing concerns about the interpretation of this code. Those in management positions have greater responsibilities: you play an essential role in maintaining our reputation and operating licence. You are expected to set a good example and create a transparent and open environment in which concerns can be raised without fear of retaliation.

The code and policy cannot cover every possible situation. If you are unsure about what to do, ask yourself the following questions:

- Do you think it is right to do it?
- Is it legal and consistent with our values and our code?
- Does it reflect well on our company?
- Would I still accept full responsibility for this decision if I read about it in the media?

If the answer to any of these questions is no, or if you are unsure, stop and seek advice.

Discuss the issue with your manager or the confidential advisor. See our website:

<https://www.vreugdenhildairyfoods.com/contact>

Disciplinary measures

A violation of the law, our code or policies can have serious consequences for our company and the individuals involved. The same applies to turning a blind eye to such a violation. As an individual, you can be held liable and get fined. In addition, our company can be held liable and get fined. A violation can also lead to disciplinary measures, including dismissal. The sanctions policy applies in this regard. It is never permitted to use a third party or any other means to circumvent this code.

Questions

For questions and support, please contact your manager or the confidential advisor, or use the 'report your concerns' feature on our website.

See <https://www.vreugdenhildairyfoods.com/contact>