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# Code of Conduct

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# Code of Conduct

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## *Handbook of code of conduct and standards*

Since many years, Durme-Natie BV has built a respectable reputation as a reliable, credible and quality driven partner in handling goods. But the negligent and inappropriate actions of an employee, cooperating party or third party can damage our organization in an instant, both economically and morally. Our behaviour within the company is characterized by both responsibility and ethical principles. Clear guidelines for such behaviour are necessary to maintain, and preferably enhance, the value of our business. Corporate Social Responsibility is a must. The board of directors has developed these fundamental principles and rules so that executives can make the best decisions, always respecting the law and internal regulations and with an aim to protect the company's image, as well as the welfare of all employees, visitors, subcontractors and the general population.

Therefore, the management invites you, dear reader, to become acquainted with the contents of this policy and make it part of your daily behaviours and actions interrelated with our company. When in doubt or unclear about proper business conduct, you are to seek advice from a superior or the management team.

## **1 The principles of our code of business conduct**

We are committed to :

- Fair competition
- Sustainability - Exclusion of inappropriate environmental risks
- Non-discriminatory and respectful working conditions - Gender equality
- Transparent reporting
- Separation of business and personal interests

The code of conduct provides a baseline, but it does not cover every conceivable situation. The final decision for proper business conduct always lies with the senior management. Of course, legal standards and regulations apply at all times.

## **2 Possible implications**

Failure to comply with internal company guidelines and legal rules can have far-reaching consequences for the company, including:

- Exclusion/misapplication of contracts
- Termination of business relationships
- Damage compensation
- Administrative fines
- Harm to corporate image
- Criminal penalties

Individual employees who violate the principles imposed may also face serious consequences, such as:

- Sanctions under labor law, with possible dismissal
- Claims for damages/loss
- Fines or detention (in case of some legal violations)

The board of Durme-Natie has the right to deny third parties access to the premises, in case of non-compliance.

## 3 The principles elaborated

### 3.1 Fair competition

Antitrust laws safeguard the antitrust community in 3 ways:

- By prohibiting collusion between competitors and anti-competitive agreements between suppliers and customers;
- By prohibiting the abuse of a dominant market position;
- By supervising the acquisition and sale of companies and other business combinations (merger control).

Market information ought to be handled carefully. Revealing business information (e.g., rates, customer and supplier relationships, internally discussed calculations, strategies, capabilities or plans etc.) to competitors is prohibited.

Making unrealistic agreements with customers/suppliers must be avoided.

Legal support should be sought for divestment, acquisition or merger of businesses.

### 3.2 Sustainability

#### 3.2.1 Environmental protection

For us, environmental responsibility means reducing our ecological footprint. Durme-Natie makes its contribution, among other things, through the use of green energy (solar panels), CO<sub>2</sub> reduction (electric forklifts), and the efficient use of resources, fuel and energy. Therefore, the predefined measures must be maintained:

- Standing stationary with the engine running should be avoided as much as possible;
- Turn off lights when leaving the room last;
- Keep gates and doors closed if possible and certainly where there is no activity.

Ecological waste management is also highly valued in our company. The company's board counts on everyone's cooperation and monitors compliance with the prescriptions, as defined by the VLAREMA legislation:

- Wood, paper/cardboard, jute, pmd, foils, green and residual waste are separated;
- Discarded equipment and containers containing ozone-depleting substances are sorted and deposited with / collected by an authorized collector;
- Wastewater (in which no hazardous substances are present) is disposed of to public sewage system.

### 3.2.2 Safety, hygiene, risk engineering

Maintaining the health of our employees is in everyone's interest. Labor hygienic and safety regulations serve to prevent accidents. All employees are jointly responsible for occupational safety at the workplace.

This is manifested in:

- Careful use of appropriate equipment, PPE and potential sources of danger;
- Strict and continuous observance of all safety and hygiene rules in the workplace;
- Duty to report defective machinery, damaged equipment;
- Listing and dynamically analyzing workplace risks and taking necessary preventive measures;
- Awareness of potential hazards through repeated forms of training;
- Accompany and inform third parties of the corporate rules.

### 3.2.3 Corporate Social Responsibility

We are committed to defining and complying with the goals and provisions of OECD.

## 3.3 Equal and respectful working conditions - Gender equality

Everyone has the right to be protected against discrimination and harassment of any kind.

No one may be unfairly treated, disadvantaged, favored, harassed or excluded on the basis of race or ethnicity, color, nationality, religion, ideology, gender, age, physical characteristics or sexual orientation.

Durme-Natie expects its employees to be friendly, objective, fair and respectful in their dealings with colleagues and third parties, and to have a presentable appearance.

Violation of these standards will not be tolerated. All conflicts should be referred to a supervisor or the Grievance Committee, who, if necessary, will take the required action to address any misconduct and prevent its recurrence.

Durme-Natie encourages an inclusive work environment where people with diverse characteristics are welcome. A colorful variety of backgrounds and leagues stimulates out-of-the-box thinking, creative ideas and openness.

It is critical that leaders demonstrate courageous leadership, with accountability and responsibility. We strive to create an environment where employees can perform, innovate and develop.

## 3.4 Transparent reporting

An internal audit system ensures proper documentation of business processes/transactions and assurance that all information relevant for accounting and legal purposes is fully and accurately recorded.

For that reason:

- All possible means of communication (e-mail, letter, verbal) content should meet criteria such as politeness, accuracy, completeness, timeliness and prudence;
- Employees notify their supervisor immediately if there is any doubt about proper reporting;
- Records are complete, orderly and organized;
- Records are kept in accordance with internal regulations.

### 3.5 Separation of business and personal interests

All Durme-Natie employees must separate their own personal concerns from those of the company. Conflicts of interest must be avoided.

- A person's individual interests or relationships should not influence *personnel decisions*.
- *Business relationships with third parties* should be established on the basis of objective criteria (e.g., price, quality, reliability, the existence of a long-term and trouble-free business relationship). The execution of a contract or the continuation or termination of a business relationship with a third party must not be influenced by personal relationships and/or personal interests.
- *Use of Durme-Natie property* (e.g., equipment, goods, vehicles, office supplies, documents, files) may not be removed from company premises without the express consent of the manager. Nor may they be used for private purposes without approval.
- *Use of the internet and e-mail* according to our Internet and e-mail policy.
- *Working outside the company* must be reported by the employee of Durme-Natie to the management. This particularly applies to positions with companies that compete with Durme-Natie or are reasonably likely to do so.

## 4 In practice

### 4.1 Compliance with the rules

All Durme-Natie employees and third parties who enter our premises must comply with this Code of Conduct. It is designed to protect the company and employees as well as subcontractors and the general public.

Each is called upon to review his or her own behaviour by the standards set forth in the Code of Conduct.

One should keep in mind that there are specific laws, internal procedures and work instructions that further elaborate on the issues addressed in this Code of Conduct.

Ambiguities should be clarified. When in doubt, employees should refrain from any action that may be illegal. Seek advice from a supervisor.

Each supervisor must set an example in his or her area of responsibility and organize himself or herself to ensure compliance with this Code of Conduct and applicable laws and procedures.

### 4.2 Duty to report

Violations of this Code of Conduct should be immediately reported to the responsible Compliance Officer.

Durme-Natie guarantees that no employee or third party will suffer any harm as a result of having reported, in good faith, a possible violation of the policy. If the reporter is involved in the violation, the company will take into account whether or not the report averted prevention of further harm to Durme-Natie in determining any punitive action against the reporter.