

# Code of Conduct for employees of Van Loon Group

## 1. Introduction

Van Loon Group is a family business. The focus on the customer, the long-term vision and the 'Improve every day' mentality can be felt everywhere: this is in our DNA. Our core values reflect what we stand for, how we treat each other and what drives us.

Within Van Loon Group, integrity, reliability and correct ethical behaviour are guiding principles. This Code of Conduct offers our employees clear principles for this. The Code of Conduct applies to all employees within Van Loon Group, and it applies to both business-related actions as well as the behaviour of individual employees while working for Van Loon Group.

## 2. Interaction with our employees

### 2.1. Interaction with each other

We treat each other fairly and respectfully. We commit to equal treatment and create a respectful work environment for all employees. We do not tolerate discrimination whereby a person or group of persons are less eligible on the basis of their ancestry, union membership, ethnicity, race, religion, age, sex (including pregnancy), sexual orientation, gender identity, marital status, veteran status, HIV status, mental or physical capability, etc., and this list is not exhaustive. Van Loon Group has a zero-tolerance policy when it comes to sexual harassment, bullying, and unwanted or aggressive behaviour

### 2.2. A safe and healthy working environment

Van Loon Group provides its employees with a safe and healthy workplace in accordance with international standards and national laws.

### 2.3. Laws and internal guidelines

Van Loon Group conforms to all laws and regulations applicable to the company, and expects its employees to support this, and to comply with these laws and regulations as well. Employees also adhere to internal guidelines.

### 2.4. Handling of company property

Employees should treat company property of Van Loon Group with care. This includes assets, money, cash equivalents, equity interests, financial data, trade secrets and confidential information. Assets and resources of Van Loon Group, and opportunities for the company should be used to pursue the goals of Van Loon Group and not for personal gain.

### 2.5. Confidential information and protection of personal data

Employees of Van Loon Group must ensure that confidential information is kept secure and protected. Confidential information is information that is exclusive to Van Loon Group and gives or may give the company a competitive advantage. Employees must not share confidential information with third parties during or after termination of their employment without the express written consent of their manager.

We protect the privacy and security of the personal data of our employees, suppliers, customers and other business associates.

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Personal data may only be used for legitimate business purposes and in accordance with legal regulations (GDPR or similar). Employees who have questions about the protection of personal data, or suspect a personal data breach should contact their immediate manager or HR.

**2.6. Alcohol and drugs**

The use of alcohol and/or drugs on the premises, in the office, or in the workplace is not permitted. Employees will not be allowed access to and/or will be removed from their work station if they are under the influence of alcohol and/or drugs.

**2.7. Whistle-blower policy**

Every employee should report a violation of this Code of Conduct or any other event, fact or circumstance that could either harm Van Loon Group's reputation, working conditions or work environment, to their manager, confidant or product integrity officer. The alternative is reporting the situation to the external reporting hotline.

Management has given the designated confidant or product integrity officer the authority and obligation to investigate each complaint in the manner they deem wise. If desired, the privacy of the employee involved should be protected in the process. If the report is not made anonymously, the reporter should not suffer any disadvantages as a result of making the report.

The confidant, product integrity officer and management reserve the right to take action as they deem appropriate based on the results of the investigation.

**3. Dealing with customers, suppliers and other business partners**

**3.1. Customers**

We contribute to the success of our customers by creating tasty and responsible meat products, meat substitutes and meals that consumers enjoy. We keep to agreements we make and communicate with our customers in a clear and transparent way.

**3.2. Suppliers and other business partners**

We are demanding and honest with our suppliers and business partners. We clearly define the deliverable, thus avoiding misunderstandings and ambiguities. We stick to agreements and expect the same of our suppliers. We deal with our suppliers and business partners honestly and as partners, treating them with the respect befitting a good business relationship.

We verify that the agreed-upon service is being provided, and communicate facts in a constructive and focused manner. We have endorsed and are committed to the Supply Chain Initiative 'Principles of Good Practice for Vertical Relationships in the Food Supply Chain'.

**3.3. Competition**

A level playing field is essential for entrepreneurialism. Unfair competition must be avoided. It is therefore important that our employees comply with Dutch and European competition laws in their work. Unauthorised price fixing, restriction of the supply of goods or services, bid rigging, market sharing, or abuse of imbalances of power must be avoided at all times.

**3.4. Gifts, gratuities and hospitality**

Employees of Van Loon Group may not offer or accept any gifts, gratuities or entertainment without the express written permission of their manager, unless they represent a small value (less than 50 euros). In the event that accepting a gift or

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gratuity may interfere with the business relationship, the employee should discuss this with their manager, and obtain written approval.

**3.5. Conflict of interest**

Van Loon Group expects its employees to avoid conflicts of interest between their personal interests and the interests of the company. Working at Van Loon Group means doing so in the best interest of Van Loon Group. In particular, it is prohibited to carry out business transactions between the company and suppliers and/or customers in which the employee or any of their family members has a financial or managerial interest, unless expressly agreed with and approved by local or senior management. Any possible case or suspicion of conflict of interest should be reported to the immediate manager of the employee in question. When in doubt, the employee should consult with their immediate supervisor.

**3.6. Bribery and corruption**

Van Loon Group competes fairly based on its products and services. Business transactions must be conducted in a fair manner and on a basis of trust, without bribery or corruption. In the case of bribery, the aim of the bribe is to get the person being bribed to do something, or fail to do something that would benefit the briber. In the case of corruption, a person abuses their position for personal or business gain, such as through embezzlement or extortion. Any form of bribery or corruption is unacceptable to Van Loon Group.

Van Loon Group strives for the highest degree of transparency and accountability company-wide. Transactions must be recorded accurately, completely and in a timely manner, in accordance with Van Loon Group's accounting policies. No unregistered funds or assets may be established or maintained.

Should an employee encounter, or suspect bribery or corruption, it is their duty to report it to their supervisor. Should this not be possible, they can make use of the Whistle-blower Policy.

**3.7. Sustainability**

As a company, Van Loon Group is part of society. And in this capacity, we also feel co-responsible for, and are engaged with the world of tomorrow. We therefore strive to produce our products as responsibly as possible, and so actively implement Corporate Social Responsibility. Van Loon Group expects all of its employees to be committed to this.

**4. Compliance: adherence to the Code of Conduct**

This Code applies to all employees of Van Loon Group and its subsidiaries or affiliates. The Executive Board and the Managing Directors of the operating companies should ensure that the Code of Conduct is adhered to and communicated to all employees. The general principles of this Code are the basis. For some of these principles, compliance is covered through specific policies and procedures. Compliance with the Code is monitored regularly. Findings and recommendations are reported to management. The Code of Conduct is periodically reviewed and revised as necessary.

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Signed by Van Loon Group

Signed by operating company

Name: Robert van Ballegooijen

Name: \_\_\_\_\_

Position: CEO Van Loon Group

Position: \_\_\_\_\_

Date: 01-10-2022

Date: \_\_\_\_\_



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