

ANNEX - CODE OF CONDUCT | PREVENTION OF FRAUD

FURTHER EXPLANATION

Fraud is a deception that is deliberately practiced to secure unfair or unlawful gain and include deceit, concealment, skimming, forgery or alteration of (electronic) documents. Fraud may be committed by one person or by two or more (collusion) and may involve internal and/or external parties such as suppliers or customers. Aalberts Industries maintains a zero tolerance approach for its companies, employees and business partners with regard to fraud.

Managers are responsible for ensuring they have identified fraud risks, having appropriate controls in place, and tracking the effectiveness of controls on an on-going basis. Each manager must make him or herself familiar with the types of improprieties that might occur within his or her area of responsibility, and must orient their personnel to be alert to any indications of potential fraud. Employees that detect or suspect any fraud must immediately report the matter to their manager or to Aalberts Industries. In addition, Aalberts Industries may initiate random checks on its companies to verify compliance with this Code of Conduct.

EXAMPLES

Example 1: An employee is requiring a kick back in order for a certain supplier to be selected. This means that for each purchase, the employee receives 2% of the contracted purchase price from the supplier. This is considered to be theft because apparently the purchase price for Aalberts Industries could have been 2% lower than the contracted price. Such behaviour seriously harms Aalberts Industries and may result in instant dismissal of the employee concerned.

Example 2: An employee presents forged documents to Aalberts Industries in order to obtain financing for the purchase of material that he will sell for his own account. This is considered theft as well and may result in instant dismissal of the employee concerned.

Example 3: An employee reported illness to his manager but used this time to paint his house. Effectively, such situation results in painting at the expenses of Aalberts Industries and could therefore be considered fraud.

Q&A

Question 1: I suspect an employee of fraud and want to know what I must do?

Answer 1: Please report the situation directly to your manager. If you suspect fraud, do not discuss the matter with any of the individuals involved and do not attempt to investigate or determine facts on your own. Your manager will review the matter and take the appropriate steps.

Question 2: I suspect my manager to be involved in a fraud scheme and want to know what action to take.

Answer 2: Report the situation to Aalberts Industries. The matter will then be reviewed without prejudice and investigated.

Question 3: Will there be consequences for me if I misjudged the situation?

Answer 3: Aalberts Industries appreciates its employees being committed to the company's interests and willing to raise concerns regarding suspicious situations. The ability to investigate and remediate fraud successfully depends on prompt and confidential reporting. You will of course not be affected for creating awareness for fraudulent conduct where in hindsight your judgement proved to be incorrect. It is of course never allowed to impeach someone intentionally without a justifiable reason.