

ANNEX - CODE OF CONDUCT | RESPONSIBLE WORK CONDUCT

FURTHER EXPLANATION

Company assets and funds

All property of Aalberts Industries may only be used for the intended business purposes. This includes but is not limited to:

- a. physical assets such as office equipment, plant facilities, tools, technical equipment, IT equipment and company cars;
- b. software, intellectual property rights and confidential information; and
- c. company funds, bank accounts and other company resources.

You must use company property only for the intended business purposes and guard it against misuse, loss or theft. Company funds may only be used for Aalberts Industries business purposes and may never be used for private purposes unless this has been approved by your manager. It is not permitted to combine business expenses such as lunches and travel trips with personal holidays with family members or friends without approval of your manager.

Use of IT and communication

Aalberts Industries' IT systems, software and all means of electronic communication, including the internet, shall be primarily used for business purposes and in the company's interest. The capacity for communications, antivirus software and licenses are implemented for business use and not for private use. Though some proportionate personal use of these systems may be inevitable, such use should be limited as much as possible and may never interfere with the intended business purposes. The IT systems may never be used in any way that can result in the storing or communicating of content that breaches applicable legislation, harassment of colleagues or third parties, or discrimination or other improper behaviour. Only if there are justifiable suspicions that you do not act in accordance with this Code of Conduct or applicable legislation, Aalberts Industries preserves the right to monitor your use of the IT systems and electronic communications in accordance with applicable laws.

Intellectual property

Aalberts Industries has developed or purchased licences for valuable intellectual property, including inventions, product names, software, engineering drawings, and confidential information for its business operation. You must strictly comply with the applicable intellectual property laws and licence conditions. Unauthorised use or disclosure of company intellectual property is forbidden and the intellectual property right of third parties must be fully respected.

EXAMPLES

Example 1: You are the coach of the soccer team of your child and urgently need to send a mailing to various sponsors for the next soccer tournament. It is not allowed to use the company e-mail service for this. Your company e-mail address contains the trade name of your company and interferes with the business purposes of this name. This can damage the image or reputation of Aalberts Industries. These mailings should be done with your private e-mail address outside office hours.

Example 2: An employee uses office supplies to provide his children with the necessary pens and pencils to do their homework. This is not allowed and is considered to be theft.

Example 3: An employee downloads illegal software that he prefers for enhancing his business presentation. This endangers the safety of Aalberts Industries IT- systems and breaches third party intellectual property rights.

Q&A

Question 1: You receive an e-mail, apparently from a colleague, containing all kinds of confidential information. The e-mail turned out not to be intended for you but for another person within the company. What should you do?

Answer 1: Please make sure to (permanently) remove this email to make sure that the confidential information cannot be misused by someone and notify your colleague.

Question 2: I sometimes take my Aalberts Industries' laptop or USB stick at home to be able to work during the evening. Of course, there might a possibility that my laptop could be stolen in case of a burglary?

Answer 2: Never leave the laptop or storage device unattended in your car or at public places. Ensure that the laptop or USB stick uses state of the art encryption and passwords to protect the company sensitive information. Ask your IT department for assistance before you store data on such devices. If the laptop has been stolen, report this immediately to your manager.

Question 3: You have to travel for a business meeting abroad with your complete management board. All managers decide to take the same flight to the final destination. Is this allowed?

Answer 3: To have the whole management board on one flight may be practical but should be avoided as much as possible. There is a (small) chance that something happens with the flight resulting in the loss of the complete management board. This is mostly a personal tragedy but also an avoidable business continuity issue.