



The Executive Committee of Anthony Veder Group N.V. and its affiliated companies (the 'company') has adopted this Code of Business Conduct (the 'code') for everyone working at or with Anthony Veder.

What we expect from our supply chain partners:

Compliance with this Code of Business Conduct. Compliance with laws, rules and regulations in the countries where the stakeholders operate. We also expect our stakeholders to have management systems in place which ensure compliance with applicable laws and regulations.

### **Commitment to customers**

We aim to do business in a consistent and transparent way with all our stakeholders. Customers place a great deal of trust in us handling their shipping requirements, logistical processes or travel requirements. Our performance, professionalism and reputation for integrity and fair dealing is vitally important in winning and retaining this trust.

### **Commitment to employees**

Our employees contribute to the success of the company through their hard work, ideas, productivity and enthusiasm. The company acknowledges these efforts and reciprocates by providing a safe and clean working environment, fair reward, benefits plans, interesting and challenging work. Central to our commitment is that we also enable our employees the opportunity to develop their skills continuously by providing a challenging job and educational opportunities, transparent communication while encouraging a healthy work-life balance.

### **Commitment to shareholders**

The company is committed to achieving a sustainable long-term return on equity.

### **Corporate accountability**

The company will conduct its operations in accordance with internationally accepted principles of good corporate governance. The company will provide timely, regular, reliable and accurate information on our activities, structure, financial situation and performance to all stakeholders. We do this by meeting the aspirations of our clients through quality products and services, but also by operating in a social responsible manner. Our aim is a business that has a long-term viable future, contributing to a world that has achieved a sustainable balance between the needs of the economy, society and the environment.

### **Corporate Social Responsibility**

The company is committed to conducting its business in a social responsible and sustainable manner. We recognize that our actions have an impact on our stakeholders, the environment, and society as a whole. Therefore, we adhere to the following principles of Corporate Social Responsibility (CSR): Ethical Conduct and Integrity, Respect for Human Rights, Labour Rights, Environmental Stewardship, Supplier Relationships, Transparency and Accountability, Safety and Health, and Continuous Improvement.

#### *Ethical Conduct and Integrity*

The company, its employees, suppliers, and business partners alike must endeavour to deal honestly, ethically, and fairly with the company's colleagues, customers, (other) suppliers and competitors. No employee or supplier should take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair dealing practice, such as bribery or corruption. Honest conduct is considered to be conduct that is free from fraud or deception. Ethical conduct is considered to be conduct conforming to accepted professional standards of conduct.

Within the company, we have a reporting procedure relating to suspected irregularities. This procedure allows employees to report and thus counteract irregularities. We expect the various parties within our supply chain to also encourage their employees to report suspected irregularities through a procedure established for such reports.

#### *Respect for Human Rights*

The company, its employees and its suppliers and business partners respect and support internationally recognized human rights as set out in the Universal Declaration of Human Rights. The company, its employees, its supply chain and business partners seek to eliminate violations of human rights such as - though not limited to modern slavery, forced labour, and child labour; and thus desires that no children below the age of 16 are employed nor forced to perform labour throughout its supply chain. The company, its employees, its supply chain, and business partners will use their best efforts to ensure that business activities do not contribute to human rights violations and they ensure that people are treated with dignity and respect.

#### *Labour Rights*

Labour rights are an important component of human rights and are crucial for the relationship between employer and employee. We recognize the importance of fair compensation, and therefore, everyone involved within the supply chain should receive fair remuneration.

#### *Safety and Health*

Safety is our number one priority. The company's motto is "everybody home safe," and that is why it strives to be able to provide a safe and healthy work environment every day. Throughout the supply chain, we also expect our business partners to be committed to the health and safety of their employees.

#### *Environmental Stewardship*

The company, its employees, its supply chain, and its business partners are committed to minimizing environmental impact and will work on sustainable initiatives throughout its operations. The company strives to conserve resources, reduce waste, and mitigate pollution. The company will comply with applicable environmental laws and regulations and seek to continuously improve its environmental performance.

#### *Supplier Relationships*

The company expects its supply chain and business partners to share its commitment to Corporate Social Responsibility (CSR). We select and work with suppliers who adhere to ethical business practices, respect labour and human rights, demonstrate environmentally responsible behaviour, and are committed to fighting bribery and corruption.

#### *Transparency and Accountability*

We maintain open and transparent communication with our stakeholders regarding our CSR initiatives, performance, and challenges. We regularly report on our progress, take responsibility for our actions, and address any concerns or complaints in a timely and appropriate manner.

#### *Continuous Improvement*

The company, its employees, its supply chain, and its business partners are committed to continuously improving their CSR performance. We set measurable goals, monitor our progress, and regularly review and update our policies and practices to align with evolving social and environmental expectations.

#### **Teamwork and trust**

We never compromise our overall integrity in the pursuit of local, external or individual interests, upholding our values and principles. We expect teamwork, integrity, trust, respect, and excellence from all stakeholders. We are open and loyal to each other and to outside partners. We trust our people, our partners and our clients, treating them with dignity and consideration they deserve, inspiring them to work as a team.

### **Employee initiative**

The company encourages its employees to take initiative by providing interesting and challenging work, defining clear goals by making its employees responsible for their actions and be open to employee suggestions.

### **Conflicts of interest**

A conflict of interest occurs when an employee's private interests interfere, or even appears to interfere, with the interests of the company. Whilst it is not possible to describe every situation in which a conflict of interest may arise, employees must never use or attempt to use their title and/or position with the company to obtain improper personal benefits. Any Employee who is aware of a conflict of interest, or is concerned that a conflict might develop, should discuss the matter with its manager or in case of involvement of the manager discuss this with the Human Resources department

### **Corporate opportunities**

Employees owe a duty to advance the legitimate interests of the company when the opportunities to do so arise. Employees may not take for themselves personally opportunities that are discovered through the use of corporate property, information title and/or position.

### **Protection and proper use of company assets**

The company's assets are only to be used for legitimate business purposes and only by authorized employees or their designees. This applies to tangible assets (such as office equipment, computer, phone, copy machines, use of internet, working hours etc.) and intangible assets (such as trade secrets, intellectual property and confidential information). Employees have a responsibility to protect the company's assets from theft and loss and to ensure their efficient use. Theft, carelessness and waste have a direct impact on the company's profitability. If an employee becomes aware of theft, waste or misuse of the company's assets, the employee should discuss the matter with its manager or in case of involvement of the manager, discuss this with the Human Resources department.

### **Compliance with laws, rules and regulations**

The company seeks to comply with all applicable laws, rules and regulations including its own policies and regulations. The company therefore encourages its employees and its supply chain to adhere to the standards and restrictions imposed by those laws, rules and regulations, including company policies and regulations. Any employee or supplier who is unsure whether a situation violates any applicable law, rule, regulation or company policy should discuss the matter with its manager. In case of involvement of the manager, this should be discussed with the Human Resources department.

### **Confidentiality and privacy**

Employees must protect the confidentiality of company information. Employees may have access to proprietary and confidential information concerning the company's business, customers and suppliers. Confidential information includes such items as non-public information concerning the company's business, financial results and prospects and potential corporate transactions. Employees are required to keep such information confidential during employment as well as thereafter, and not to use, disclose, or communicate that confidential information other than in the course of employment. The consequences to the company and the employee concerned can be severe where there is unauthorized disclosure of any non-public, privileged or proprietary information. To ensure the confidentiality of any personal information collected and to comply with applicable laws, any employee in possession of non-public, personal information about the company's clients, potential clients, or employees, must maintain the highest degree of confidentiality and must not disclose any personal information unless authorization is obtained.

### **Internal reporting**

Employees shall take all appropriate action to stop known misconduct by any fellow employee that violates this code. Employees shall report any known or suspected misconduct with its manager. In case of involvement of the manager, this should be reported to the Human Resources department. The company will not retaliate or allow retaliation for reports made in good faith.