

# Van Aarsen Code of Conduct

June 2021

## Message from the Board

Van Aarsen is a unique company. Van Aarsen is a vital link in the feed chain. We highly value quality, safety and innovation. Our mission is to be a worldwide leading manufacturer and supplier of machines and installations for the production of animal, pet and fish feed, from concept to completion. Within our company we continuously strive for optimization. In order to continue to improve our performance in this rapidly changing world, Van Aarsen believes it is very important that we remain true to our core values. The following core values are the basis for the Code of Conduct:

- People
- Quality
- Environment
- Integrity

Our Code of Conduct includes both our core values and our most important policy principles. The Code of Conduct is a guideline for our management and staff to act appropriately within the company. The values, standards and behaviour guidelines of the Code of Conduct must be complied with at all times in order to remain a successful, trusted company and prevent incidents.

Excellent relations with all stakeholders are one of the keys to our success. At Van Aarsen we encourage our employees to contribute to the creation and maintenance of these excellent relationships. We therefore believe it is important that we communicate with all our stakeholders with integrity and respect.

This code of conduct does not explain specific situations, but highlights Van Aarsen's values, standards and behaviour. We trust our employees to act in accordance with the Code of Conduct by following the standards and guidelines for behaviour and encourage them to report a suspected violation of the Code of Conduct. In case you, as our highly valued stakeholder, have a question related to our Code of Conduct or you want to report a suspected violation, please feel free to contact us at [compliance@arsen.com](mailto:compliance@arsen.com).

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## Contents

|                                 |   |
|---------------------------------|---|
| Van Aarsen Code of Conduct..... | 1 |
| Message from the Board.....     | 1 |
| People.....                     | 3 |
| Quality.....                    | 3 |
| Environment.....                | 4 |
| Integrity.....                  | 4 |

## People

### DISCRIMINATION

We provide equal opportunities in employment to all employees. At Van Aarsen we are committed to:

- not practice any form of discrimination in hiring or employment practices on the grounds of race, colour, ethnic origin, religion, nationality, gender, sexual orientation, age, physical ability, health condition, political or social opinion, union membership, or marital status or any other basis prohibited by Dutch and/or EU law.
- create a workplace where teamwork is promoted and everyone feels valued and respected.

### HUMAN RIGHTS

At Van Aarsen we support the protection of human rights and strive to ensure that actions that conflict with these rights have no place within our operations or our supply chains, anywhere in the world. We are committed to:

- not engage in or benefit from any form of forced or involuntary labour.
- not engage in or benefit from any form of child labour.
- ensure that all workers receive at least the minimum wage required by law or applicable industry regulations.
- do not conduct business with suppliers, customers or other external parties acting in violation of international human rights.

### WORKING CONDITIONS

Every employee has the right to work in an environment that's free from violence or harassment. At Van Aarsen we also want to ensure that everyone returns home safely from work every day. To help us create a safe, healthy and comfortable work environment we:

- insist on a culture that requires all work is done safely.
- do not tolerate harassment, intimidation or physical force possibly to causing bodily harm.
- avoid the (mis)use of drugs, alcohol and other controlled substances that can threaten the safety, health and/or productivity of our employees.
- ensure that employment conditions, including vacation, working time, and leave periods, are consistent with mandatory standard laws or applicable industry regulations.
- invest in resources to assist employees who want to develop to their full potential.
- ensure a healthy and safe working environment, assessing risks and taking all necessary measures to eliminate or reduce them.

## Quality

Van Aarsen has adopted top quality as one of its uncompromising commitments. We are committed to meeting customers' expectations for high quality and regulatory compliant products. We have the following principles:

- we are fully committed to delivering products and services that satisfy all requirements of quality and operator safety. We comply with all health and safety laws in addition to our own safety requirements.
- we only deliver products that fulfil the applicable international standards
- to make sure we always provide safe and high-quality products, our employees should always apply effective processes to measure and record product and process performance and, where appropriate, take effective preventative steps or corrective action to assure great product quality.

## Environment

### RESPONSIBLE TOWARDS THE ENVIRONMENT

Van Aarsen attaches great importance to the environment. We contribute in various ways to the environment within our possibilities. We use the following guidelines:

- Van Aarsen aims to at least comply with the legal requirements and interests of other stakeholders.
- Van Aarsen strives to minimize the burden on the environment with its activities, production process and end products.
- Van Aarsen strives for continuous improvement in the field of impact on the environment and to ensure sustainable and efficient use of resources.
- within Van Aarsen, all employees bear responsibility for the environment. All incidents, almost incidents and possible points for improvement should be reported to the management.

### RESPONSIBLE TOWARDS SOCIETY

Like the environment, Van Aarsen also contributes to society in various ways. Van Aarsen:

- is a recognized learning company that offers opportunities for internships, traineeships and guided tours.
- supports various social activities.
- strives to build and maintain good relationships through open and honest communication to its stakeholders and its immediate surroundings.

## Integrity

### DATA PRIVACY

We respect the privacy of our employees' and business partners' personal data and collect and retain personal data only as required to operate efficiently and as permitted by law. At Van Aarsen we have the following principles regarding personal data collection:

- at Van Aarsen we protect personal data well, keep it up-to-date and destroy the data if it is no longer needed.
- access to personal data is restricted to those employees who have appropriate authorization and a legitimate business need.
- Van Aarsen handles personal information with care and only for valid business and contractual purposes.
- Van Aarsen always handles commercial and technical business-sensitive information from our suppliers and external parties with care and confidentiality.

### CONFIDENTIAL INFORMATION AND ICT

At Van Aarsen, we act in a reliable and professional manner when dealing with confidential information, our ICT infrastructure and other business assets. Confidential information is company information which is not made public and possibly of value.

We make sure that all confidential information is properly protected and kept from unauthorized use and distribution. This applies to confidential information of others (like customers and suppliers) as well as our own. We only reveal our company's confidential information to persons outside Van Aarsen for an allowed business purpose and then only when a proper (non-disclosure) agreement is in place. Even within our company, we only share confidential information with people who have a business 'need to know'. We use confidential information of others (including our customers) only if and as far as our company has a legal right to do so.

As regards ICT and business assets, we treat them carefully and professionally, and adhere to our 'e-behaviour code' which describes in detail how to deal with electronic communication means.

## **ANTI-FRAUD**

We believe in integrity and in behaving fairly and honestly in all circumstances. We do not accept any fraudulent behavior, which is behavior that is intended to deceive or mislead others. This includes theft, falsifying invoices or other documents (like putting wrong dates on a document), and helping dishonest transactions of any kind.

This means that we do not falsify documents, help illegal trade of any kind or deceive or mislead others. We also abstain from helping others in doing so. We make sure that our internal communications are correct, up to date and complete in order for higher management to take decisions based on all correct facts.

## **CONFLICTS OF INTEREST**

We strive to avoid conflict of interest situations where our personal interests could inappropriately influence our business judgment. A conflict of interest occurs when an employee is led to make an inappropriate decision in their own personal interest rather than in the Company's best interest only in carrying out their professional duties. To avoid this at Van Aarsen we:

- do not allow third parties and suppliers to influence or attempt to influence employees or their family members e.g. by providing them with gifts, favours, entertainment, personal benefits.
- our employees must immediately and fully inform their direct manager in case their decision-making on behalf of our company is in any manner influenced by personal relationships, by participation in external activities or a personal interest
- avoid even the appearance of a conflict of interest and ask prior written approval for any ancillary activities which may touch the business interests of Van Aarsen or compete for our employees' time
- have the policy that any gifts should not create any personal benefit or influence business decisions. Although gift-giving is a common and accepted practice in some situations, it can also be interpreted as a form of bribery and therefore any gifts should be considered carefully. Acceptance of a small gift or invitation for modest entertainment is permitted. A gift or entertainment offered meets the definition of small, modest, infrequent, given with the right intention and if it can be made public without any form of reluctance, shame or doubt. All gifts we receive are distributed randomly to the staff every year.

## **CORRUPTION**

At Van Aarsen we strongly disapprove of any form of corruption, internally and externally. Corruption may take various forms, including commission payments and royalties, consulting fees, marketing expenses, travel and entertainment expenses, rebates or discounts or free goods, paid or provided directly or through third parties. At Van Aarsen we conduct business honestly, without the use of any corrupt practices. To create a corruption free environment at Van Aarsen and within our supply chain we:

- maintain a zero-tolerance policy on corruption and notify our direct manager in case anything seems outside the normal course of business or we suspect corrupt behaviour.
- put pressure on eliminating corruption when it is found that it occurs within one of our supply chains. If the desired effect is not achieved, we terminate the relationship with the party concerned.

## **FAIR COMPETITION**

We believe in conducting business in a fair and competitive manner, thereby carefully complying with competition laws which are designed to ensure fair and effective competition. Within Van Aarsen it is therefore not permitted to agree with competitors on any commercial issue or to co-ordinate our company's behaviour with that of our competitors. Nor should a dominant market-share be abused.

This means that only legally allowed sources of competitive information may be used (e.g. received under a non-disclosure agreement, licensed materials or officially published). In addition, it is needless to say that employees are not allowed to discuss markets together with competitors or to divide them in any way.

## **INTERNATIONAL LAWS**

Van Aarsen complies with applicable laws and regulations in the countries where we conduct business.

### **BUSINESS OBLIGATIONS**

At Van Aarsen we are committed to strengthening business relations, based on trust. Fair communication, mutual respect and the fulfilment of promises are crucial for this. To optimize our business relationships, we:

- keep track of all transactions in our accounts accurately and fairly.
- are committed to doing business in a fair and transparent way.
- always keep our business promises and we share unexpected events in a proactive, timely and open manner.
- work together with our suppliers to insure they contribute to our integrity commitments set out in this Code of Conduct.

### **MONEY LAUNDERING AND TERRORISM**

At Van Aarsen we are dedicated to comply with national and international laws and regulations on money laundering and terrorist financing. We only do business with reputable business partners whose business activities are legal and whose revenues are derived from lawful sources.

### **EXPORT CONTROL**

Van Aarsen always complies with export control laws and respects export or trade sanctions or other prohibitions if applicable to our company. To achieve this at Van Aarsen we:

- perform checks on (potential) customers to be sure that we are not conducting business with entities or persons that appear on EU or OFAC sanctions lists which can negatively affect the company's image.
- make sure we have the correct authorization before we import and export goods.
- seek legal advice when we have doubts about import and export controls or sanctions.