

## ***Engagement and code of ethics***

### **1. Behaviour principles**

Krekelberg considers the principles listed below as fundamental:

**a. Compliance with laws and regulations**

*Krekelberg believes in the compliance with the law as a fundamental instrument for reaching company objectives, and for guaranteeing the “Additional value” of the business. Krekelberg will neither start, or continue, any relationship with anybody not willing to fall into line with this principle.*

**b. Behaviour integrity**

*Krekelberg is inspired by the principles of Social responsibility for protection of its clients, suppliers, and other third parties, which is why it spares no effort to guarantee the quality of its products and/or services and the transparency of its behaviour on the market.*

**c. Rejection of discrimination**

*Krekelberg avoids any discrimination based on race, origin, religion, age, disability, sex, civil status, sexual orientation or any other discrimination of any person.*

**d. Development of human resources**

*Krekelberg believes that human resources are its main capital, therefore it invests in staff training and ensures a healthy and safe workplace.*

**e. Professional behaviour**

*The Safety and Prevention Measures adopted by Krekelberg to ensure Safety and Health in the Workplace are primary obligations of Krekelberg collaborators, who actively take part in their application, management, maintenance and improvement. Being aware of the consequences for Krekelberg and their own colleagues if these sectors are handled badly, said collaborators fully accept their responsibilities for the company’s objectives.*

**f. Loyalty, Honesty, Integrity**

*Anybody working for Krekelberg must abide by the discretion obligation and cannot, for any reason, divulge facts, information or news about Krekelberg and its clients.*

**g. Solving conflicts of interest**

*While carrying out their jobs, the staff pursue the objectives and general interests of Krekelberg. They shall immediately inform their supervisors of situations and activities that could be conflicting to those of Krekelberg, and caused by staff or their relatives, and in any other case in which important reasons of appropriateness exist. The staff will respect the decisions made by Krekelberg on the matter.*

**h. Zero tolerance for harassment**

*Krekelberg guarantees a safe working environment, where staff are not victims of bullying or harassment, whether sexual or of any other nature. Bullying and harassment will not be tolerated. In reaction to any sign of harassment or abuse, the company will carry out the relevant investigations, taking the necessary measures to solve the problem.*

**i. Cruel or inhuman activity**

*Krekelberg prohibits, and asks all people and companies that work for it to prohibit physical abuse, physical disciplinary measures, threats of physical abuse, sexual or other types of harassment, verbal abuse or other forms of intimidations.*

**2. Standards of conduct**

**a. Relations with staff**

**i. Staff management**

*People are Krekelberg's main resource, which is why it pays special attention to the development of each single person, and to their professional growth on a purely merit basis.*

**ii. Staff training**

*Krekelberg attributes a primary and qualifying value to this aspect for its activity, and dedicates resources, suitable instruments and time to reaching behavioural objectives, with particular attention to Safety and Health in the workplace and the principles that inspire this Code of Ethics.*

**iii. Staff involvement and participation**

*Staff involvement while working is ensured; this involves moments of participation in discussions and exchange of information, both of which are functional for reaching the company's objectives.*

*Staff must participate in these moments with a spirit of collaboration and independence of judgement.*

**iv. Freedom of association and the right to bargain collectively**

*Krekelberg recognises that workers have the right, without distinction, to be part of a trade union or to create a trade union of their own choice and to bargain collectively.*

**v. Child labour**

*Krekelberg shall not employ child labour to perform its activity. "Child labour" is defined as work carried out by anybody under 18 years of age.*

**vi. Health and Safety at work**

*Krekelberg is committed to offering a working environment that protects the health and safety of its staff, considering this obligation as a productive investment, as well as a factor of growth and of additional value for Krekelberg.*

**vii. Hygiene**

*Krekelberg supplies to the staff, who operate for any company purpose, with a working environment that is as hygienic as possible for the type of product made in the company.*

**viii. Environment**

*Krekelberg shall comply with all legislation, regulations and applicable standards, paying particular attention to the continual updating of legal and other types of prescription, and to the prevention of any form of environmental risks connected with its activity.*

**b. Staff obligations**

i. Behaviour regarding safety at work

*Each employee must:*

- *Take care of his/her own health and safety.*
- *Use the protective equipment made available to him/her in an appropriate manner.*
- *Not remove or modify the safety equipment, signals or control devices without authorisation.*
- *Not carry out, of his/her own accord, unauthorised operations or movements that can compromise his/her own safety or that of other employees.*
- *Use the working tools, substances and dangerous preparations, means of transport and safety equipment correctly.*

ii. Use of company assets

*Each person must work diligently to protect the company assets, using responsible behaviours in line with the adopted operation procedures aimed at regulating asset use, precisely documenting how they are used.*

**c. Relations with clients**

*Krekelberg looks after the contracts and communication with its clients, being aware of the fact that clients are its reason for being. As such, correctness and transparency are essential not only in form but also in substance, ensuring that the communication is exhaustive, clear and well understood.*

**d. Relations with suppliers**

*Relations with supplier, including those regarding financial and consultancy contracts, are constantly monitored by Krekelberg according to the "Codes of Ethics".*

### **3. Implementations mechanisms of the code of ethics**

#### **a. Diffusion and communication**

*Krekelberg will diffuse the code of ethics using suitable means of communication and the company instruments, among which the company internet site ([www.krekelberg.nl](http://www.krekelberg.nl)), informative meetings and staff training. Everyone must have the code of ethics, be familiar with its contents and comply with what is written in it.*

#### **b. Reporting of problems or alleged violations**

*Anyone becoming aware of or is reasonably convinced of, the existence of a violation of this code, a specific law or of company procedures, must immediately inform their supervisor and the board.*

#### **c. Disciplinary measures resulting from violations**

*The provisions in this code are an integral part of the contractual obligations accepted by the staff, as well as those subjects having business relations with Krekelberg. Violating the principles and behaviours set out in the code of ethics compromises the relationship of trust between Krekelberg and the authors of the violation, whether managers, employees, consultants, collaborators, clients or suppliers.*

*Violations will be prosecuted by Krekelberg with suitable disciplinary measures.*

#### **d. Operating procedures and decision-making protocols**

*In order to prevent violation of laws in force and the code of ethics, Krekelberg will envisage the adoption of specific procedures by anybody who is part of the operation process, to identify the subjects responsible for decision-making, authorisation and operation processes: individual operations must be carried out during the different phases by different people, the duties of whom will be clearly defined and acknowledged by the organisation, in order to prevent unlimited or excessive powers being granted to individual subjects.*

### **4. Final provisions**

*This code of ethics is originally approved by the Krekelberg board on the 31-03-2017.*

*Any variation and/or integration made to this code of ethics must be approved by the board and quickly spread to its addressee using suitable methods.*