

Van Gelder's Supplier Code of Conduct

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A. Objective

Van Gelder's ambition is to be a leading Dutch full-service infrastructure company, with a special role as a director of sustainable and future-proof public spaces. Not only in an operational sense, but also in our day-to-day activities. At Van Gelder we expect our employees to do business with honesty and integrity and we expect the same of our suppliers.

This Supplier Code of Conduct describes what we require from our suppliers with regard to compliance with laws, regulations and business conduct.

The requirements in this Code of Conduct apply to all business entities that cooperate with Van Gelder, being all companies or participations affiliated to Van Gelder Group, whether it concerns subcontracting, delivery or services; or cooperating in any other capacity. This Code of Conduct complements other pre-existing contracts with Van Gelder's suppliers. Nothing in this Code of Conduct is intended to replace any specific provisions in a specific contract; in the event of any inconsistency between this Code of Conduct and any other provision of a specific contract, the other provision will prevail.

B. Guiding Principles

Within Van Gelder, we work on the basis of four rules of thumb, so-called guiding principles. These form the basis of our daily actions, namely:

- 1) Conscious safe working
- 2) We act with integrity
- 3) We continue to learn and continue to develop ourselves
- 4) Our word is our bond

Van Gelder expects its suppliers to cooperate in applying these guiding principles in the business conduct between Van Gelder and the Supplier.

C. Code of Conduct

Clauses of this Code of Conduct:

1. PEOPLE AND WORK

1. The Supplier complies with labour legislation and respects the rights of its employees and hired staff in areas such as safe working conditions, working hours and salary.
2. The Supplier ensures safe and healthy workplaces for its own employees but also for any third parties present on that site.
3. The Supplier is aware of the need for social safety in the workplace and is actively committed to preventing bullying and discrimination, for example. Also when recruiting or appointing new employees.
4. The Supplier respects the freedom of expression of its employees and/or subordinates and encourages them to address any abuses relating to their working conditions.

5. The Supplier only employs employees with whom an employment contract has been concluded in a language understandable to the employee.

2 BUSINESS TRANSACTIONS

1. The Supplier is not involved in any corruption or bribery, nor does it tolerate such activities from its own business relations or third parties.
2. The Supplier will actively endeavour to comply with all legal obligations that apply to it based on, for example, the Dutch Competition Act.
3. The Supplier does not make illegal price-fixing agreements with third parties and does not make or accept proposals that could lead to an inappropriate advantage, e.g. bribes.
4. The Supplier does not share Van Gelder's (offer) sensitive information with third parties. Examples include information on tenders, technical developments, Van Gelder's order portfolio or purchasing rates.
5. The Supplier complies with all its obligations under applicable tax laws and regulations and can also demonstrate this if requested by Van Gelder.
6. As soon as the supplier intends to submit a bid for a tender, whether or not in combination and/or by a binding tender with Van Gelder, and one of the circumstances referred to in Article 2.86 and/or Article 2.87 of the Dutch Public Procurement Act 2012 applies or may apply to it, it will notify Van Gelder of this without delay - at least before the tender period closes.
7. In principle, the Supplier checks whether it complies with the Code of Conduct and whether any third party it engages complies with it. The Supplier will report any violations of the Code of Conduct in full to Van Gelder.
8. Van Gelder may investigate Supplier's compliance with the Code of Conduct and conduct audits if necessary. The Supplier will fully cooperate with such investigations and audits.
9. Van Gelder applies a 'Misconduct and interpersonal conduct reporting procedure' (appendix). It expects the Supplier to be familiar with this reporting procedure and to apply it if necessary. Application by the Supplier will in any case be required in case of suspected or identified illegal or criminal activity, which may potentially affect Van Gelder's business activities and/or reputation.
10. Van Gelder reserves the right to unilaterally amend the substance of the Code of Conduct.

3 ENVIRONMENT AND SUSTAINABILITY

1. The Supplier will comply with the environmental legislation applicable to its work and will take all necessary measures to prevent any environmental violations.
2. In the event that an environmental violation nevertheless occurs at the time of the performance of the work commissioned by Van Gelder, the supplier will immediately report this to Van Gelder and take all measures necessary to prevent further damage.

3. Like Van Gelder, the Supplier is actively engaged in the further sustainability of its Business Operations.
The Supplier is open to further sustainability suggestions from Van Gelder and if the Supplier sees any opportunities for Van Gelder they will inform it of them immediately.
4. The Supplier will comply with all promises made to Van Gelder under Corporate Social Responsibility and Procurement.

Appendix:

Van Gelder's Misconduct and interpersonal conduct reporting procedure, version 1, dated 01.10.2024