

Van Gelder's integrity code:

This is us and this is
what we stand for

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Foreword by the Executive Board

Van Gelder operates on the basis of trust. By giving confidence to our colleagues and cooperation partners, we offer everyone the space to perform to the maximum, to develop further and to work pleasantly.

At the same time, we are acutely aware of the society with which we are inextricably linked. A society that takes a critical look at what we do as an infrastructure company and employer and how we do it. And that goes beyond the question: do we comply with current laws and regulations?

Acting with integrity is a precondition for the success of our company. Doing the right thing, especially when no one is looking, makes us a reliable partner and an attractive employer. Acting without integrity jeopardizes the continuity of the organization and puts Van Gelder's reputation at stake. It is therefore important that everyone who works for Van Gelder knows what Van Gelder stands for, acts accordingly and calls each other to account for not acting with integrity.

This integrity code has been drawn up with the greatest possible care. The code applies to everyone who works for Van Gelder*. We expect them to behave 'in the spirit' of this code. The code does not lend itself to behaviour 'to the letter'. Van Gelder has a number of regulations for this, such as the Code of Conduct. The integration code is intended as a guideline for the desired behavior and the conversation we have about it with each other. The manager plays a leading role in this. It is precisely they who must create an atmosphere in which colleagues can discuss their concerns or doubts, without worrying about possible consequences.

Management of the Van Gelder Group

*see page 7

"Doing the right thing, especially when no one is looking, makes us to a reliable partner and an attractive employer."

***Who does the code apply to?**

Van Gelder's integrity code applies to everyone who works for Van Gelder Group, Van Gelder Kabel-, Leiding- en Montagewerken, Aannemingsmaatschappij Van Gelder, Van Gelder Rail, Van Gelder Telecom, Van Gelder Verkeerstechniek, Van Gelder Leidingbouw, Asfaltproductie Midden-Nederland, Van den Heuvel Lightrail, Klever Boor- en Perstechniek, Multiline, Opleidingscentrum Gelderpoort, SAB Electro, Stam & Co, TM Techniek, Trinitas Infra, Van Voskuilen, Vermeulen or Van Roon works, whether or not employed.

Ask yourself...

The code does not provide an answer to every situation. If you are unsure about how to act, you can ask yourself the following questions:

- Do I understand the risks and can I oversee their consequences?
- Is it legal?
- Am I willing to accept the consequences of my action?
- If this becomes known, will it reflect positively on me and Van Gelder?
- Can I explain it at home?

Is the answer to any of these questions 'no'?

Then first consult with your direct supervisor or the HR department.

Dealing with partners

Van Gelder stands for honest cooperation. We work together in a businesslike manner and only with reliable partners who act with integrity. Van Gelder's interests always come first.

What does that mean for us?

We calculate and pay fair prices and are objective and clear about the choices we make. We strive to select our suppliers based on generally accepted market principles. Do you have a personal interest in a decision to be made? Or do you feel pressured to make a certain decision? Then report this to your manager or to the HR department. Discuss together what is best for you.

Only accept a gift if you do not damage the interests or good name of Van Gelder or jeopardize your independent position. There should never be anything in return for a gift. Be aware of when you accept a gift. So never just before a negotiation, tender, contract signing or discussion about additional or less work.

We never accept money or gifts that are more expensive than €50. If you receive an invitation from a relation to an activity/event or if you want to invite a relation to an activity/event yourself, please ask permission from the management.

Dealing with competition

Van Gelder stands for fair competition. We deliver value, keep our promises and ask a fair price for what we perform. We always comply with competition law.

What does that mean for us?

We do not cooperate in matters that restrict fair competition. We do not make price agreements with competitors. We also do not share sensitive information. By this we mean This includes information about tenders in which we do or do not participate, technical developments, our order book or purchase rates. Do you have to share sensitive information in the context of your work? Discuss this with your manager first.

Only collect information about competitors from public sources.

**"Before you know it,
you have told
something in such
an informal
conversation that
you later think: I
shouldn't have done
that."**

Dealing with customers

Our clients, whether they are a government agency, company or private individual, must be able to rely on us to treat their interests with care. We adhere to our agreements and legal rules regarding safety and integrity. After all, we are all the calling card of the organization.

What does that mean for us?

As tempting as it may be at times, we do not use information that we have obtained dishonestly. It is also not allowed to profit from confidential information (or to allow others to benefit from it).

Are you involved in, for example, a tender or a tender and do you get access to information during that process that you should not have? Then discuss the situation immediately with the managing director of Van Gelder Groep. The financial consequences of this can be very large and damage the continuity of Van Gelder.

It is not permitted to work outside working hours (and at your own expense and risk) for customers, clients, competitors or suppliers of Van Gelder. Ancillary activities, in whatever form, are reported to the management in advance . See also your employment contract for this.

Because we are all Van Gelder's calling card, during work but also on the way to work, we adhere to the applicable traffic rules.

Realize that civil servants and public clients must adhere to strict rules and are not allowed to accept gifts. So don't embarrass them with that.

Interaction with each other

Everyone who works at Van Gelder is entitled to a safe and pleasant working environment. We work together on the basis of mutual respect and trust. We encourage the personal development of colleagues.

What does that mean for us?

Treat a colleague as you would like to be treated. Are you aware of differences in taste, humor and origin. What one person thinks is an innocent joke, another may experience as hurtful or threatening. We do not accept transgressive behaviour such as bullying, discrimination, intimidation, exclusion and abuse of power.

Do you see or experience this kind of behavior in your work environment? Then talk to the person(s) involved . Can't figure it out together? Then inform your manager. Is there a personal, familial, or romantic relationship that negatively affects your work? Even then it is good to talk about this with your manager or the HR department.

Take responsibility for your own development and actively encourage others to develop further.

**"With every joke
about my skin
color, I think: let it
go.
Because if I say
something about it, it
will only get worse.
But it really makes me
feel shitty."**

Asset handling

We only use business assets such as money, equipment, construction and office materials, working time and knowledge for Van Gelder. We handle the assets we use with care.

What does this mean for us?

We do not use company assets privately. Do you still want to use a Van Gelder business asset in exceptional cases? This is only possible if it has been discussed in advance with your manager and he or she has given permission for it. We will report damage to a business asset that we have used privately with permission immediately and in accordance with the agreements we have made about this. Any costs arising from this are for the account of the user.

You can only buy business assets that Van Gelder no longer uses if you have had prior written permission from the general manager of Van Gelder. You will receive an invoice for this that you must pay in advance (never in cash).

We record all transactions and agreements made in the administration completely, correctly, on time and in an insightful manner. Costs of materials and equipment, hours spent and the like are only booked on the correct project and/or cost center. The administration provides a reliable picture of the state of affairs in the company. We do not tolerate fraud.

"I then think, taking a cubic meter of sand home, that should be possible. But where is the limit? At ten cubic meters? At a horse arena full? And how often is that allowed?"

Dealing with the environment

Sustainable entrepreneurship is one of Van Gelder's guiding principles. In everything we do, we strive for a good balance between the interests of the organization, people and the environment. It is not without reason that we are committed to a liveable, safe and more sustainable Netherlands.

What does this mean for us?

All colleagues contribute to achieving our sustainability ambitions. Can something be better or more sustainable? Above all, share your idea with the organization. We can only learn from that.

Has something gone wrong during the work that could endanger the environment or local residents? Then we will deal with it immediately according to the rules we have agreed with each other.

Reporting a violation

If you suspect or become aware of a violation of this Code of Integrity, it is your duty to address it appropriately. You can contact your manager, the management, the HR director, the Compliance Officer or Van Gelder's confidential advisors for this. Not discussing it can only make the situation worse.

Reporting to the Compliance Officer is mandatory when it comes to (possible) violations of the Competition Act, such as prohibited price fixing, violations of health and safety and environmental legislation and criminal offenses, such as theft, fraud, bribery and money laundering. We call all these things 'Abuses'.

Undesirable behaviour between people, such as discrimination, violence, intimidation, bullying, swearing and sexual harassment is called 'Treatment'. For this you can contact the internal or external confidential advisors of Van Gelder in confidence.

See the Reporting Procedure for Abuse and Treatment of Van Gelder. vangelder.com



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