

## The Code of Conduct for Customers, Suppliers & Volburg

**Background:** Much has changed since Volburg was founded 1996. Our product portfolio has consistently grown and we have continually expanded our collaboration with our partners: new customers have joined us and we have expanded our business to the Europe.

Over the years we have become an important link between suppliers and customers.

For this reason, we feel equally committed to both partners in the supply chain.

We value partnerships that have evolved over many years just as much as new ones and we want to achieve milestones together.

A supplier's performance and adherence to high business standards is an important and integral part of the value chain for Volburg. We promote and expect the application of high legal, ethical, environmental and employee-related standards within our own business and among our suppliers.

### I. Customer and Supplier Relations

{CONCLUSION of  
CONTRACTS}

As the interface between customer and supplier, we need to enter into agreements with both sides in order to ensure a course of business.

This is to protect our business partners, and of course ourselves too. For this reason we endeavour, right from the start, to equip our business processes with clear rules of play, so that those processes can take place without problems.

{CONFIDENTIAL OR  
PROTECTED CUSTOMER  
AND SUPPLIER  
INFORMATION}

In the day-to-day work you often receive and give out confidential or protected information. This information should be given only where both parties have signed a confidentiality agreement.

Under no circumstances, except as necessary for the normal course of business, may any employee divulge such information to any third party or use such confidential or proprietary information for their personal advantage.

Suppliers shall not share or exchange any price, costs or other competitive information or undertaking of any collusive conduct with any other third party to Volburg with respect to any proposed, pending or current Volburg procurement.

## II. Society

- {ABIDING by the LAW} • The applicable laws and regulations shall be observed.
- {PROHIBITION of Corruption and BRIBERY} • The supplier undertakes not to encourage, tolerance or get involved in any way whatsoever in any form of corruption or bribery.
- {WAGES and WORKING HOURS} • Wages, including overtime and special services, shall be guaranteed according to the level of applicable laws and provisions;  
• The maximum number of working hours laid down in the applicable national laws shall be adhered to.
- {HUMAN DIGNITY} • We respect and protect the personal dignity of every individual.  
• We do not tolerate discrimination against or harassment of our staff and staff of Suppliers.  
• The Supplier shall promote cooperation, individual responsibility and acceptance of diversity among its employees. The Supplier and its employees shall not engage in discrimination based on race, colour, age, gender, sexual orientation, ethnicity, disability, place of origin, ancestry, source of income, pregnancy, religion, political affiliation, union membership, family status or marital status in hiring and employment practices such as promotions, rewards, and access to training.
- {Child labour} • Any form of child labour is prohibited We reject the use of child labour -either by ourselves or by our suppliers.
- {Forced labour} • The Supplier shall not use any forced, bonded or indentured labour or involuntary prison labour. All work shall be voluntary, and workers shall be free to leave upon reasonable notice.
- {Employee Treatment, Harassment and Abuse} • The Supplier's employees shall be treated with respect and dignity and Supplier's disciplinary policies and procedures shall be clearly defined and communicated to employees before application. There shall be no harsh and inhumane treatment, including any physical, sexual, psychological, verbal harassment or abuse, or corporal punishment; nor is there to be the threat of any such treatment.
- {Freedom of Association and Collective Bargaining} • The Supplier shall work directly with employees to find solutions to any outstanding legal and employment issues while at all times respecting worker rights to obtain representation, join labour unions, and/or bargain collectively. Workers shall be able to communicate openly with management regarding working conditions without fear of reprisal, intimidation or harassment.
- {Human trafficking} • Human trafficking has to be condemned.  
Violations of human rights are both a cause and a consequence of trafficking in persons. Accordingly, it is essential to place the protection of all human rights at the center of any measures taken to prevent and end trafficking.

### III. Employees

{TOLERANCE,  
FAIRNESS and EQUEL  
OPPORTUNITIES}

We value each of our employees equally. We do not discriminate by race, ethnic origin, gender, religion or political views, or by disability, age or sexual identity. We do not tolerate that any of our employees should be disadvantaged for any of the above reasons, and we expect proper, friendly and fair dealings with colleagues, employees and with our business partners.

{DATA PROTECTION,  
CONFIDENTIALITY  
AND PROTECTION OF  
OTHERS' RIGHTS}

Personal data may be collected, processed and used only as necessary for the stated, clear, and authorised purpose.  
Company documents must be protected from access by unauthorised parties.

{HEALTH & SAFETY  
AT WORK, HEALTH &  
FIRE SAFETY}

- It is our obligation to avoid endangering people and the environment, to keep the influence on the environment low, and not to waste resources. Processes, business premises and operating materials must comply with the applicable statutory and internal specifications for health and safety at work, as well as health safety, fire safety and environmental protection in the scope of our legal certifications.
- The supplier undertakes to take responsibility for the health and safety of his employees;
- To control hazards through organizational measures and take the best possible precautionary measures against accidents and occupational diseases;
- To offer training on the topic of occupational safety;
- To set up and use occupational safety management.

### IV. Environment protection

{Environment protection}

- The supplier is obliged to act in accordance with the applicable statutory and international standards regarding environmental protection;
- To minimize environmental pollution and make continuous improvements in environmental protection;
- To set up and use an environmental management system according to ISO 14001 or equivalent;
- Suppliers should make practical efforts to minimize the use of energy, water and raw materials. Where possible, these should be renewable or sustainably sourced

**V. Supply chain**

- Suppliers will only use subcontractors or other third parties who will comply with all applicable laws and regulations and who adhere to the same (minimum) standards set forth in this guide;
- Suppliers must comply with all applicable trade control laws and regulations in the import, export, re-export or transfer of goods, services (including software and technology). All invoices and any customs or similar documentation submitted to Volburg in connection with transactions involving Volburg must accurately describe the goods and services provided and the price thereof.

**Monitoring:**

VOLBURG expects that suppliers will actively audit and monitor their day-to-day management process to ensure compliance with this Supplier Code of Conduct.

MD

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