

## Code of Conduct

*VBE Group B.V. and MSA Group B.V. with all business units, is a logistics service provider with a good reputation. Maintaining and strengthening our good name is of great importance. As our business grows, however, complexity increases. Changes in society, legislation and international trade create additional challenges, which we must deal with properly and transparently. This code of conduct is an aid to that end.*

*This code of conduct provides practical guidelines for the ethical behavior we expect from all our colleagues. This code of conduct is based on our culture: **Dynamic, Open and Connected**. The code applies to all business units. Every employee, from high to low, is accountable for the behavior set out in this code, regardless of business unit, location or nature of work.*

*Michael de Rouw, CEO*

### You & our environment

#### *Accepting ancillary positions, gifts and invitations*

The acceptance of ancillary positions, gifts and invitations is subject to the condition that the interests of our company are not harmed. To avoid conflicts of interest, or the appearance of them, employees must seek prior approval from management for paid and unpaid ancillary activities with some business nature. HR has an advisory role.

Business gifts or invitations can be accepted as long as nothing is expected in return. Cash gifts are never accepted.

#### *Offering gifts and invitations*

Good relationships are important. Business gifts or invitations can be offered as long as nothing is expected in return. Forms of influence that could embarrass our relations must be avoided. In case of doubt, consult with management.

Our company is transparent about the choices made when sponsoring organizations and activities. We must always be able to justify our choices in this.

Relations must not be influenced in an inappropriate way and must never be asked to abuse their position. In some situations, it is not immediately possible to determine whether a bribe or an accepted payment has occurred. When such situations arise (abroad, for example), employees must present the situation to the management. Actions must always comply with national and international regulations.

#### *Social media*

The use of social media may (negatively) affect our company's reputation. This can also happen unconsciously and outside working hours. Employees are expected not to make statements that damage our good name.

### You & our market

#### *Competition*

Each business unit stands out in the market. Applicable competition law must always be respected in this respect. Activities that limit fair competition, such as price-fixing and market-sharing agreements, must not be undertaken.



### *Procurement*

Procurement involves dealing with contractors and suppliers in a businesslike and open manner. Suppliers must be treated fairly and the choices we make must be justifiable.

## You & our organization

### *Corporate assets*

Corporate assets include buildings, equipment, office equipment, ICT facilities, working hours and business knowledge. The starting point is that corporate assets are only used for work.

### *Confidential information*

Corporate information is one of the most important corporate assets. This corporate information concerns, for example, pricing information and privacy-sensitive information. Corporate information must be kept confidential. The same applies to information received in confidence from relations.

### *Administration*

All transactions and agreements made must be fully and clearly recorded in the records. The records must provide a complete and transparent picture. Internal and external reports, offers and invoicing must be complete and correct.

## You & your colleagues

### *Staff conduct*

Employees must treat one another respectfully regardless of origin, gender, religion or belief. Inappropriate behavior such as discrimination, bullying, harassment or violence will not be tolerated.

Inappropriate behavior from customers, contractors and suppliers towards colleagues will not be tolerated. BU managers are responsible for addressing the business relation on this.

### *Committed and responsible*

Employees are engaged and take responsibility. If something happens that does not seem right or raises questions, it is discussed. If doubts persist or employees are unable to resolve a matter themselves, management gets involved.

### *Open and honest culture*

The management is expected to encourage employees to act with integrity, setting a good example. They are expected to create a working climate in which dilemmas surrounding compliance with this code can be discussed. All employees have a responsibility to contribute to an open and honest corporate culture.

### *Compliance*

This code of conduct describes the minimum standards that apply to everyone, regardless of position within the organization. Violations of this code of conduct will lead to sanctions.

In case of doubt about compliance with this code of conduct, consultation with the management will take place. HR staff and the Compliance Committee are also available to everyone for consultation. They will handle all questions, signals and reports confidentially and carefully. When a colleague is aware of a violation of this code of conduct, it is his or her duty to raise it internally in an appropriate manner. The person reporting should never suffer any disadvantage from such a report.