

Code of Conduct

Arcus Holding BV, and related entities, prioritizes safety & environment and good employment practices. We have implemented a socially responsible marketing policy and are convinced that our desire to excel in these areas contributes to establishing long term relationships. We aim to excel in delivering optimal customer value and interact with our stakeholders in an honest and transparent manner.

Safety & the environment:

Health and safety are top priorities. To ensure the safety of staff and other stakeholders, both internal and external, safe working methods are in place at the various sites. Shipments are packed properly, tools are secured and inspected annually and users undergo appropriate training. We comply with national environmental legislation and discharge permits. We work to achieve energy efficiency and minimize harmful discharge, emissions and waste production in a lifecycle perspective. We work ambitiously, through continuous improvement, for a healthy work environment and safe and secure conduct according to internationally recognized health and safety management principles, practices and applicable law.

Gifts, Hospitality and Improper payments:

Employees or representatives or anyone closely related to them, will not accept financial advantages, kickbacks or gifts (except for promotional items of minimum value). Hospitality such as social events, meals or entertainment may be offered if there is a clear business reason. Travel, accommodation and other expenses for the individual representing Arcus will always be paid by Arcus. We will not, in order to obtain or retain business or any advantage in the conduct of business, offer, promise or give any improper advantage to a public official (or a third party) to make the official act or refrain from acting in relation to the performance of her/his official duties. This applies regardless whether the advantage is offered directly or through an intermediary.

Child and forced Labor:

We do not focus only on material quality and organization, but also on socially responsible business practices. We refuse to use child or forced labor and are fully aware of our social role.

Employment Practices:

We treat our employees equally and fairly. We respect human rights and pursue a zero tolerance policy with regard to discrimination, sexual harassment and bullying. We guarantee equal opportunities and equal treatment, irrespective of ethnic origin, gender, skin colour, disability, nationality, world view, religion, sexual orientation or social origin. This also applies to political opinions, providing these are based on democratic principles and tolerance towards those who think differently.

Secrecy and data protection

Confidential information refers to all information that is not freely accessible. This information amounts to a corporate asset, and so any unauthorised forwarding may damage the interests of Arcus or of third parties acting on our behalf. In the same way as we treat non-public data confidentially, we respect and protect confidential information from third parties. We commit ourselves to handling all personal data responsibly, with due care and in line with valid data

protection provisions. Direct or indirect use of confidential business information during and after the end of an employment relationship for personal advantage, for the benefit of third parties or to the detriment of Arcus is prohibited

Law and ethics

We comply with all applicable laws and regulations in the countries we run our operations and undertake to comply with fair, ethical and transparent business practices. We do not purchase any materials or services that do not conform to national or international laws and conventions.

Whistleblower system

Arcus gives its employees the right to approach the responsible executive, the Compliance Officer, the HR department, either openly or anonymously, personally, electronically, in writing or on the telephone.

Arcus has appointed Joyce Wigmans as Compliance Officer (telephone number: +31 (0)78 6483662; e-mail: Joyce.Wigmans@arcus.nl).