



INTRODUCTION

De Rooy believes that operating in a socially responsible and ethical manner, in compliance with the laws of those countries in which we operate and in which all employees carry their responsibility is fundamental to our long-term success. This means, among other things, that we adopt fair employment practices, protect safety in the workplace, support and foster environmental consciousness and comply with applicable laws. This code of conduct embodies our core ethical values and is an instruction to all De Rooy locations and all its employees.

LAWFUL CONDUCT

Laws and regulations

Complying with applicable laws includes amongst others respecting minimum employment age, working conditions, working hours, driving time, as well as with regulations regarding speed limits, the dimensions, weight and load of trucks, compensation and benefits, as well as complying with applicable laws for the import and export of goods, services and information.

De Rooy is also committed to its responsibility for the safety and health of its employees, by complying to applicable law and regulation and enhancing employee safety and health through proper workplace design, operational controls, preventative maintenance and safe work procedures.

No discrimination of any kind is tolerated in the workplace ; we implore our employees to treat each other with dignity and respect; never discriminate on the basis of race, disability, colour, gender, gender identity or expression, sexual orientation, nationality, political affiliation , religion or belief, age, marital status or otherwise. This also translates to we do not tolerate unfair hiring practices, unfair pay disparities, and/or unfavourable treatment in promotion and professional development.

Child labor and modern slavery

Child labor is not allowed; it is therefore strictly forbidden to work at De Rooy under the minimum age and when this is found, the police will be called immediately.

At De Rooy we will never employ slave indentured or forced labour or engage in human trafficking. We will not engage or tolerate restrictions of movement, confiscate identity documents and/or passports, withhold wages or use recruitment fees that may lead to debt bondage. Employees are free to terminate their employment, within the legal required notice period.

Money laundering

We comply with applicable legal provisions against money laundering. De Rooy will not engage or get involved in activity involving of which may rise the appearance of money laundering.



BUSINESS ETHICS

Generally accepted social values and norms.

Our staff is aware that they represent De Rooy through their behavior, shaping its reputation externally and De Rooy's culture internally. All employees treat others as they expect to be treated themselves. The outcome is fair and respectful interaction with customers, suppliers and other external individuals, who have a business relationship with De Rooy.

It is essential that clients can continuously trust De Rooy. That is why De Rooy will adhere to generally accepted social values and standards and to compliance with applicable legal requirements when recruiting and carrying out assignments. The recruitment and execution of assignments must take place within a pure, businesslike relationship.

Fair competition

De Rooy upholds standards of fair business in accordance with applicable anti-trust or anti-competition laws and regulations. De Rooy avoids unfair competition or behavior that restricts or could restrict competition in an improper manner. This includes using only drivers with the correct driving license and complying with cabotage rules.

Fair competition in Business relation

It is not permitted to give or accept gifts, or to provide or receive free services or products to/from (potential) clients, relationships of (potential) clients or to third parties with whom business relationships are maintained, other than small gifts which are a token of appreciation and to the extent that the recipient is not or feels not obligated to do anything in return. Gifts that can be converted into money or equivalent to it are always unacceptable. Payments that may embarrass De Rooy are not permitted. The amount of the payment is not significant. In case of doubt, consultations are held with the immediate superior.

Anti-Corruption

De Rooy works against corruption in all its forms, including extortion and bribery.

Administration and invoice processing

The administration of a project must be accurate and transparent. Invoices are therefore drawn up in accordance with legal rules and business practice. Cash payments will never be accepted, unless payment is made in accordance with generally accepted controlling principles.

Counterfeit products

It is not permitted to buy or to accept any fake products or products that are produced by child labour.



AVOIDING CONFLICTS OF INTEREST

(Ancillary)functions

Political aspirations of or fulfillment of public or other positions, whether public or not, by De Rooy employees may not conflict with fundamental rights. If necessary, it must be made clear that opinions are not being expressed and positions are being taken on behalf of De Rooy.

Conflicts of interest

At De Rooy we do business in an open and transparent way avoiding conflicts of interest that could interfere with objective and professional decision making. If there is any suspicion of a conflict of interest, correct action will be taken, possibly by stopping projects.

DEALING WITH INFORMATION

Anti-trust

De Rooy expects its suppliers, subcontractors and service providers not to damage De Rooy's confidence in them. These business partners can expect the same from De Rooy. De Rooy will not use suppliers or anyone else to violate or circumvent applicable laws and regulations. De Rooy will not act contrary to what is generally accepted in society.

Written record

In doing business with business partners, objective and business considerations are made when assigning or collaborating; agreements must be fulfilled in writing.

Accountancy

Bookings we make and invoices made up will not be fake or obscure the true nature of a transaction. The accounting shall comply with generally accepted accounting principles and shall be structured in accordance with principles and applicable guidelines of the internal controlling function.

Selection and information

The selection of business partners is based on business grounds. Also, obtaining information about competitors, suppliers, service providers, and others is done only lawfully.

When carrying out works, De Rooy's business relations are expected to also comply with all applicable environmental and health & safety laws and regulations in all countries in which they operate but also to follow the De Rooy's sustainability and ethics values mindset. De Rooy informs its relations of these latter rules.

Information transfer – Disclosure of information

It is not permitted to make statements to third parties that may harm De Rooy's economic and (im) material interests.

The management of De Rooy makes its decision based on correct and accurate information. Information must be recorded in the correct manner. Financial and non-financial information shall be disclose in accordance with applicable regulations and prevailing industry practices.



We support statutory authorities in the execution of their duties. The relevant issues shall be discussed with government officials or authorised supervision and required information will be provided, where and when required.

Protection of (confidential) information

Information is safeguarded and appropriate steps are taken to protect its confidentiality, integrity, and availability in line with its classification. To do so best practices for cybersecurity are followed, including monitoring processes, to protect information from breaches, cyber-attacks, or cyber-incidents, including training of employees on cyber security.

Intellectual property

Employees must keep all intellectual property secure and not access, copy, or disclose to anyone without proper authority. Employees must not misuse confidential information or intellectual property, and must maintain the integrity and security of any De Rooy document or information for which they are responsible.

Data privacy

Appropriate measures are put in place to respect privacy, to protect personal data against loss and unauthorized access or use, and to comply with relevant applicable privacy and information security laws and regulations.

This also means the information of digital tachographs is solely used for legitimate purposes, and always in a way that respects the right to privacy of drivers.

WORKING CONDITIONS

Social norms and values

Within the generally accepted social norms and values, every De Rooy employee retains the right to act according to his or her own values and norms. Within De Rooy - also within the generally accepted social norms and values - the following specific values apply: decisive, tailor-made, innovative, responsible and flexible. De Rooy employees are obliged to comply with the statutory regulations and to adhere to generally accepted social norms, values and privacy.

Training

In order to enhance the level of the workers professional skill and / or to build awareness on safety topics, De Rooy offers a training program, at no charge for the employees.

Safety, Health, environment

At De Rooy we undertake to ensure a good and safe working environment and layout of the workplace, among other things by complying with all legal requirements, in order to preserve the health of employees and drivers, safeguard third parties and prevent accidents, and workrelated illnesses. Therefore employees will observe all applicable safety, health and environmental regulations and rules when carrying out their work activities. To help establish a process enabling the continuous reduction of work-related health hazards and improvement of occupational health, safety and fire safety, employees are implored to eliminate unsafe situations and report them immediately.



Working and living conditions

Employees and drivers are provided with (clean) toilet facilities and free drinking water – taking account of national laws and regulations or standards. All facilities for the consumption and preparation of food as well as for food storage are hygienic. Provided dormitories for drivers and garage workers are clean, safe and provide sufficient space.

Aggression and violence

Aggression and violence are not tolerated at De Rooy. In the event of a threat or physical violence will be reported to the police. Any damage is recovered from the perpetrator.

Alcohol and drugs

Using or being under the influence of alcohol or (non-medically prescribed) drugs or other substances that can effect driving ability , is not permitted at De Rooy.

Emergencies

To be prepared in case of emergency at De Rooy there is an emergency response organization. Employees should acquaint themselves with the Emergency plan and -routes and help by keeping escape routes and emergency exits always clear of obstacles. In the event of an emergency, all persons present must follow the instructions of the police, the fire brigade and/or the company emergency worker (s).

Justice

De Rooy employees are assessed on their performance and their proven qualities. De Rooy expressly rejects discrimination on any ground as mentioned before. Physical, verbal or sexual harassment will not be tolerated, specially, but not limited to, offensive behavior, physical or sexual harassment, or intimidation.

Freedom of association

All employees are freely allowed to join associations, and bargain collectively, in accordance with local law. Also Employees are able and are encouraged to openly communicate and share ideas and concerns with management regarding working conditions and management practices. Both without fear of interference discrimination, intimidation, harassment or retaliation.

Disciplinary practices

De Rooy treats all personnel with dignity and respect and shall not engage in or tolerate the use of corporal punishment, mental or physical coercion or verbal abuse of personnel.

ENVIRONMENT

Environmental care

De Rooy wants to contribute to the responsible development of the built environment. A good environmental care policy is integrated into day-to-day business operations. De Rooy employees are expected not to perform any actions that conflict with this objective.



Active approach to environmental challenges.

Subsequently to the daily environmental care, De Rooy is looking forward to ecological challenges with due care and foresight and sets out to improve the impact on the environment and the health of employees and keep at a minimum in all activities. To monitor the environmental performance of services, targets and environmental key performance indicators are set. Focus points are to minimize energy consumption and air emissions that pose a risk to the environment and health, including greenhouse gas emissions, with the goal to establish net zero greenhouse gas (GHG) emission operations and supply chains by 2050 at the latest.

Resource efficient products and processes

The efficient use of energy, water and raw materials, the use of renewable resources, like solar panels, and the minimization of damage to the environment and health are all taken into consideration in the development, raw material extraction, product service life and recycling stages as well as in other activities.

Waste and recycling

At the Rooy we monitor, track and treat liquid and solid waste generated by its operations, industrial processes and sanitation facilities and foster opportunities for improvement to reduce waste like the use of more sustainable resources, re-using resources and recycling.

Responsible Sourcing of Minerals and materials

De Rooy is aware of the OECD Due Diligence Guidelines for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, but doesn't utilize the referred Conflict Minerals.

REPORTING INCIDENTS

Reporting obligation

Every De Rooy employee who has a well-founded suspicion or becomes aware of actions that violate generally accepted social or ethical norms and values is encouraged to immediately report this to his/her immediate superior. It is our aim to create an environment where employees can safely raise (suspected) business misconducts or incidents within the De Rooy organization and to deal with them appropriately, before escalating, so that appropriate measures can be taken in good time.

Grievance mechanism and Whistleblowing policy

In case this isn't handled satisfactory, there is the possibility for a formal route, to be used as a last resort escalation, with the Grievance Mechanism.

Such report can also be done anonymously, through the De Rooy whistle blower policy. This policy is also the escalation path for serious regulatory violations by De Rooy or it's relations, in which case an external investigative office (in Netherlands Huis van de Klokkenuiders) can be involved.

Board of Management De Rooy