



CODE OF CONDUCT VOGTEN GROUP MAASTRICHT

Introduction

- The Vogten Group, located in Maastricht, operates a Steel Service Center, specialized in pickling, decoiling, slitting and cutting/bending of and trading in steel. The group includes Vogten Staal B.V. and Rapid Steel Service B.V. The group employs 115 people. The management attaches great importance to running the company in a responsible, ethical and respectful manner. This code of conduct explains what we mean by this. We expect our employees and our suppliers to act responsibly and respectfully, which we will also ensure where possible.
- This code of conduct can be seen as a guideline, not as an all-encompassing document that covers every possible situation.

Working Conditions

- We do everything possible to create a safe working environment (which of course includes machine safety), provide adequate protective equipment and continuously monitor this.
- We do not tolerate any form of discrimination or intimidation and expect respectful behavior from our employees so that a safe working environment is provided not only in a physical sense but also in a mental sense.
- We respect the legal rules for the right of freedom of association and the right to collective bargaining.
- We ensure that our employees can contact a confidential counselor who can speak to the employees independently of the management.
- We have a reporting procedure and therefore call on our employees to express themselves freely, without any fear of reprisals in any form.
- We have a zero tolerance policy against alcohol and drugs in the workplace, as well as against theft or fraud.



- We ensure a fair remuneration policy, will reward equal work equally and offer adequate training and development opportunities.
- We carefully comply with labor laws, including but not limited to minimum wage requirements and working hours.

Human rights

- We respect human rights, regardless of whether these are enshrined in national regulations or international treaties, for example, but not limited to, not tolerating child labor, forced labor, modern slavery, racial discrimination or any other form of discrimination, respecting women's rights, freedom of association, religion, expression, etc..

Act ethically

- We operate the business on the basis of ethical conduct and will not in any way seek to gain advantage from unfair competition, bribery or blackmail.
- We have an adequate anti-corruption policy.
- We ensure that there is no conflict of interest.
- We ensure that we do not become involved in any way in money laundering, terrorism or any other form of crime.
- We carefully comply with embargoes or sanctions.

Environment

- We comply with all environmental regulations and test this on a regular basis.
- We operate our business with respect for our immediate environment, neighbors and local residents.
- We use natural raw materials and energy as efficiently as possible.
- We aim to reduce our CO2 emissions wherever possible.



Government

- We will strictly comply with all government regulations, national and local.
- We will not start any activities before a necessary permit has been obtained.
- We reject tax avoidance and will ensure correct tax payment in order to contribute to society.
- We use respectful behavior towards government institutions and will strive for maximum transparency.
- We will not offer gifts to government officials.

Privacy

- We strictly comply with applicable privacy protection laws when collecting, processing, storing, etc. personal data, whether this concerns employees, customers or any other business party.

Business relations

- We strive to do business with suppliers and service providers who also set themselves adequate standards in the areas described in this code of conduct.
- We will do business fairly with our suppliers and service providers and make our business decisions dependent on objective criteria (such as price and quality) and will not in any way engage in illegal or unethical practices, which we in turn also expect from all our business relations expect.

Financial integrity

- We ensure correct, accurate and complete administration.
- We correctly comply with tax legislation.
- We have a transparent attitude towards our accountant.
- We will not include incorrect, incomplete or misleading information on our financial data carriers.



- We ensure adequate protection of all our assets and IT systems.
- To the extent we are required to disclose financial information, we will do so in a timely and complete manner.

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Management Vogten Group

D.H.M. Vogten

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