



General Code of Conduct

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1. General information

We, the management of Adley NV and Adley Nederland BV, undertake to comply with all applicable laws and regulations.

We undertake to comply with the following values and to implement them. Adley expects this of all employees, of all suppliers and of all partners.

With a view to successful implementation and compliance, this "General Code of Conduct" is communicated to all employees, to all suppliers and partners.

2. Respect for human rights

As an international company, Adley commits to respect human rights.

a) Equal opportunities and anti-discrimination measures

We are committed to having a non-discriminatory work environment and non-discriminatory dealings. We decisively confront unequal treatment of any kind (discrimination and prejudice); this applies for:

- gender,
- race,
- origin,
- affiliation,
- faith,
- political opinions,
- language,
- birth,
- assets,
- disability and
- any other characteristic which acts as a distinguishing feature.

b) Child labor and younger employees

Children need special protection. Under the UN Convention on the Rights of the Child, they also have a right to health, education, play and recreation time. We adhere to this convention, and we argue against child labor as matter of course. We expect this as well from all our customers, all our suppliers and all our partners.

We would only employ minors from the age of 16 years. We support the legal employment of young minors from the age of 16 years for training purposes, under training contracts. In this respect, we adhere to special employment provisions, such as the ban on working at night. Young employees are not engaged in any dangerous work, or work which damages their health.

c) Protection against forced or bonded labor and harassment

It is only the motivation to work of one's own free will, that brings inspiration to perform at the best level.

We commit to work that is purely performed at one's own free will. We do not tolerate forced labor and bonded labor. All our employees are free to decide whether to work at Adley or not. Our employees are also free to decide on the type and location of their private leisure activities.

Adley is not involved in, nor does it support, violence, physical or psychological punishment, humiliating or degrading treatment or threats.



3. Positive relationships

We strive for positive relationships with our employees, customers, and partners. All relationships have the goal of mutual benefit: a win-win situation, to enable a long-term relationship. We aim to factor in the interests and requirements of all parties and look for the best possible solution.

Only by working positively together we can create something great. We encourage and support each other to achieve mutual success.

4. Fair working conditions

Adley believes in fair wages and salaries, at least to the level of the statutory wage. Payment is made automatically and on time. The restriction of and dealing with the matter of overtime is legally and contractually regulated.

We comply with national legal regulations on working time restrictions. All employees have the right to regulated working hours and breaks.

Since we want to ensure that our employees are satisfied, we allow them to make suggestions and work together with them to make things better. Our employees are free to join a trade union of their choice.

5. Quality

We want to provide high-quality services, so we can have satisfied customers and stakeholders. The satisfaction of our customers and stakeholders, in the long term is our, final goal.

Adley therefore only works with first class suppliers and partners which have proven themselves in product quality and product consistency. Most suppliers and partners are in a contractual relationship with Adley for over 20 years and have proven their reliability as well as the ability to take corrective action when required.

Adley has established a quality management system to ensure that our customers receive goods and services on time, in full, within the agreed specification and with the correct paperwork. We perform quality-assurance measures for all relevant processes. We follow a complaint procedure with our suppliers and customers.

6. Protection of the environment

An intact environment is our greatest asset. Therefore, we treat it with care.

We must prevent the pollution of the air, of water and soil as far as possible. We also consider issues around noise protection, advocate the careful consumption of resources, and reduce energy consumption.

We ensure proper waste disposal and participate in recycling systems. However, waste prevention is the priority.

If possible, we choose the alternative which has the least negative impact on human health and the environment.



7. Occupational health and safety

Motivated and healthy employees are the engine of the company. Without them, we would not be efficient.

We are committed to the preservation and promotion of health by providing a healthy working environment. We evaluate potential hazards and take precautions. We train our employees on how to conduct our business safely and on how to proceed in the event of accidents.

We provide a clean, ergonomic, and safe working environment, fulfil all requirements of modern chemistry and of current safety regulations. We have an independent medical consultant who looks after the health and safety of our employees. We have a collective hospital insurance for all our employees.

Our occupational health and safety concept also includes a strict ban on alcohol and drugs at Adley.

8. Anti-corruption policy

Our business relations are carried out in an exclusively transparent manner and with integrity. We accept and adhere to national and international anti-bribery laws and prohibit any form of corruption, receipt or offering of bribes or deception. We expect this of ourselves as well as from our business partners and deal only with customers and third parties who adhere to these same principles.

Our employees are encouraged to avoid situations from which a potential conflict of interest may arise. This also applies to conflicts between personal interests or those of the spouse, close relatives, friends, or business partners.

Our employees may not discuss prices with their competitors nor discuss offers with them. They are also prohibited from providing competitors with any information on previous, current, or future prices. We do not participate in cartels.

9. Protection of information

We are committed to the concept of loyalty.

This applies to the handling of confidential information.

a) Confidential and proprietary information

Our staff must treat sensitive information, including confidential, personal and/or proprietary data, properly. Information may only be used for the purpose for which it is submitted, and not for other purposes (e.g., advertising, public relations, and the like), unless the owner of the information has given prior consent.

b) Information security

Our staff must protect confidential and proprietary information of others – including personal information from unauthorized access, damage, use, modification and/ or redistribution, through appropriate physical and electronic safety measures. It must be ensured that the information is not passed



on to third parties. As soon as protected information such as personal data is no longer needed, it must be deleted.

c) Intellectual property

We observe and follow all relevant laws on intellectual property rights, including protection against disclosure, as well as patents, copyrights, and trademarks.

Corporate property and third-party property are dealt with, with greatest care.

10. Continuous improvement

We always strive to improve. This also applies to adherence to our values.

Any person who becomes aware of a violation of the Adley values regarding how we treat customers, employees, suppliers, or any other person or organization, is required by Adley to report this violation to the latter. Anyone reporting a violation will not be discriminated against.

Adley shall look for a solution to improve compliance with the values. Adley does not seek relationships with organizations or individuals who do not comply with our values. As necessary, Adley will suspend such a relationship and look for alternatives.

11. Sustainable development

We subscribe to the Agenda for Sustainable Development adopted by all United Nations Member States in 2015. For each decision where we hesitate and have a choice, we will go back to the 17 Sustainable Development Goals (SDGs) and make the decision that best fits with achieving these goals.

By doing so Adley will make its contribution to improve health and education, reduce inequality, and spurs economic growth -all while tackling climate change and working to preserve our oceans and forests.

Johan BLONDEEL

Director

Adley NV – Adley Nederland BV

26 January 2022