

STANDARD OF CONDUCT

Alewijnse companies and their employees will conduct their business in accordance with the Core Values and the Business Principles referenced below.

It is the responsibility of every Alewijnse employee individually and each Group company collectively to live up to our Core Values and Business Principles.

Alewijnse expects its business partners to adhere to Core Values and Business Principles consistent with its own. See the Supplier Code of Conduct to learn more in detail about the obligation

Alewijnse adheres to the following Business Principles:

1 OBEYING THE LAW

Alewijnse companies, Business Partners and their employees must obey the laws and regulations of the countries in which they operate.

2 COMMUNITY AT LARGE

Alewijnse will conduct its activities in a socially responsible manner, respecting its employees and other stakeholders. Alewijnse will give proper regard to health, safety and the environment. Alewijnse companies are encouraged to support the community in which they operate and offer their employees the opportunity to play an active role in society while respecting their responsibilities towards Alewijnse.

3 EMPLOYEES – WORK ENVIRONMENT – HEALTH AND SAFETY

Alewijnse is committed to; providing an attractive working environment for its employees, promotes equal opportunities for employees, will not tolerate harassment of any kind, provides safe and healthy working conditions in order to prevent harm to the health of all employees and other stakeholders.

Alewijnse therefore requires its employees to comply with health and safety regulations, will not make use of any form of forced, compulsory and/or child labor, recognizes the right for employees to establish or join an employee organization of their choice (including trade unions), as well as the right to be represented by such organization.

Alewijnse employees are expected to apply high ethical standards.

4 COMMUNICATION

Alewijnse will assure open and clear communication between employees and management on all aspects of the working environment. All communication should take place in a fair manner respecting the integrity of Alewijnse companies and their employees.

5 BUSINESS INTEGRITY

Alewijnse will not allow bribery and/or any other forms of unethical business practice in its companies or by its employees. No employee may receive, make, offer, promise or authorize any payment or gift which is, or may be construed as being a bribe.

The group companies of Alewijnse and their employees ensure that integrity risks for entering into and maintaining a business relationship with partners such as customers, suppliers and agents are identified and managed and that agreements are made with partners concerning the fulfilment of the Core Values and Business Principles. Alewijnse companies and their employees will make sure not to cooperate, be it directly or indirectly, in money laundering, fraud and/or financing of terrorism. All business transactions and payments shall be accurately and completely recorded in accordance with Alewijnse's accounting principles, and local laws and may be subject to audit. Alewijnse companies and their employees must comply with export and import controls in the countries where Alewijnse conducts business, and (economic and humanitarian) sanctions that may apply to their business activities.

6 COMPETITION

Alewijnse supports the principles of free enterprise and fair competition. Alewijnse does not tolerate violation of competition laws. Alewijnse companies and their employees will conduct their operations in accordance with the principles of fair competition and all applicable competition laws.

7 CONFLICTS OF INTEREST

Employees should avoid conflicts of interests between their private dealings and their responsibilities towards Alewijnse. Prior approval by management is required for the fulfilment of private functions that may interfere adversely with the interests of a Alewijnse company. Alewijnse Group companies do not participate in, or support political parties. Alewijnse Group companies do not make any payments or donations to political parties or their institutions, agencies or representatives. Alewijnse does not facilitate political donations by employee action committees.

8 SAFEGUARDING INFORMATION AND ASSETS

Alewijnse recognizes and respects the importance of protecting personal data.

Alewijnse has developed valuable intellectual property rights, including patents, trademarks, copyrighted works, and trade secrets (e.g. confidential technical or business information), which employees have a responsibility to protect. The transfer thereof is subject to the prior management approval. Therefore, unless otherwise directed, employees should not disseminate privileged Alewijnse information beyond limits established in the normal course of fulfilling their job role/ description. Releasing such information outside this scope will require prior approval from the employee's relevant manager.

COMPLIANCE & REPORTING

Alewijnse expects that all employees, including temporary employees, subcontractors, volunteers and trainees comply with this Code of Conduct.

Employees are also expected to discuss questions concerning the Code of Conduct and dilemmas in the workplace with each other and their supervisors. Infringement of the Code of Conduct is specifically prohibited. Alewijnse understands that where work is done, mistakes can be made. We learn from mistakes and they give us the opportunity to improve things. Conscious infringement of the Code of Conduct, however, such as fraud, bribery or conflicts of interest may lead to the appropriate sanctions. Alewijnse expects employees to report infringements of this Code of Conduct directly to their supervisors and to the Group Compliance Officer.

SUPPLIER CODE OF CONDUCT

The Supplier Code of Conduct of Alewijnse sets forth minimum workplace standards and business practices, consistent with the Alewijnse company values, that are expected of any supplier that does business with Alewijnse.

Suppliers are understood to be: person(s) or organization(s) that does business with Alewijnse for the delivery of products or services. It includes all Suppliers affiliates and subsidiaries.

Alewijnse recommends that Suppliers implement the standards of this Supplier Code of Conduct to their own business partners, which includes (sub-)suppliers, subcontractors, agents, joint venture partners or any other associated partner.

Furthermore, Alewijnse expects that Suppliers ensure that adequate and relevant training is provided to all their employees in a language that the employee understands.

Any reference in this Supplier Code of Conduct to employees shall include representatives, officers, directors or any other person working on behalf of, or at the premises of, the Suppliers.

Suppliers shall adhere to the following business principles:

1 OBEYING THE LAW

- 1.1** Suppliers' personnel and operations shall operate in full compliance with the laws of their respective countries and with all other applicable laws, rules, and regulations.
- 1.2** Suppliers will ensure that products, services and shipments for Alewijnse comply with all applicable international trade compliance laws, rules, and regulations.
- 1.3** Suppliers must comply with export and import controls applicable to their business activities and inform Alewijnse of any export and import control that may apply to their products and services as provided to Alewijnse.

2 COMMUNITY AT LARGE

Suppliers will conduct their activities in a socially responsible manner, respecting their employees and other stakeholders. Suppliers will give proper regard to health, safety and the environment in accordance with the applicable laws, rules and regulations.

3 HEALTH & SAFETY

Alewijnse is committed to safeguarding the health and safety of its employees and to protecting the environment.

- 3.1** While Suppliers are on-site at a Alewijnse location, or any third party location on behalf of Alewijnse, Suppliers shall comply with Alewijnse's safety policy and any site-specific requirements. 3.2 Suppliers shall ensure a safe working environment and minimize physical and chemical hazards through proper design, engineering and administrative controls, preventative maintenance and safe work procedures as well as ongoing safety training.
- 3.3** Suppliers shall provide employees with appropriate global and personal protective equipment where hazards cannot be adequately controlled by other means.
- 3.4** Suppliers shall minimize the impact of emergency situations through the implementation of emergency plans and response procedures.

4 ENVIRONMENT

At Alewijnse, environmental considerations are an integral part of business practices and the production of world-class products. Suppliers shall comply with all applicable environmental laws and regulations.

- 4.1** Suppliers shall maintain all required environmental permits and registrations and follow the operational and reporting requirements of such permits.
- 4.2** Suppliers shall comply with regulated substance specifications and with any applicable laws and regulations prohibiting or restricting the use or handling of specific substances.

5 LABOUR

Suppliers shall protect the rights of employees and treat them with dignity and respect.

- 5.1** Suppliers shall provide an attractive working environment and equal opportunities for their employees.
- 5.2** Suppliers shall hire employees on the basis of their ability to do the job, not on the basis of their personal characteristics or beliefs. Suppliers shall also comply with all applicable child labor laws according to local regulations.
- 5.3** Suppliers shall set working hours, wages and over-time pay in compliance with all applicable laws. Employees shall be paid at least the minimum legal wage or a wage that meets local industry standards, whichever is higher.
- 5.4** Suppliers shall treat employees with dignity and respect and will not engage in or permit corporal punishment, threats of violence, or other forms of harassment whether based on gender, race, color, religion, ethnicity, age, sexual orientation, national origin, disability, or any other legally protected characteristic.
- 5.5** Suppliers will not make use of any form of forced or/and compulsory labor.
- 5.6** Suppliers recognize the right for employees, if applicable, to establish or join an employee organization of their choice, as well the right to be represented by such organizations.
- 5.7** Suppliers' employees are expected to apply high ethical standards.

6 ETHICS AND BUSINESS INTEGRITY

Suppliers shall commit to the standards of ethical conduct when dealing with their employees, suppliers and customers.

- 6.1** Suppliers shall comply with the standards of fair business, advertising, and competition. They shall prohibit and make sure not to cooperate, directly or indirectly, in money laundering, fraud, corruption, financing of terrorism or any illegitimate action by their employees.
- 6.2** Suppliers will not allow bribery and/or any other forms of unethical business practice in their companies or by their employees. No employee may receive, make, offer, promise or authorize any payment or gift which is, or may be construed as being, a bribe.
- 6.3** Suppliers shall accurately record their business activities, structure, financial situation, and performance in accordance with applicable laws and regulations as well as prevailing industry business practices.
- 6.4** Suppliers will respect their role in the global supply chain of Alewijnse. They will not take any actions that damage the present and future commercial position of Alewijnse.
- 6.5** Suppliers have to respect the interests of Alewijnse's customers and other Suppliers of Alewijnse. 6.6 Alewijnse recognizes that it is customary for some of its Suppliers, customers and other business associates to occasionally give small gifts or offer modest entertainment to those with whom they do business. It is important, however, that these gifts and entertainment events do not affect the Suppliers' or their employees' business judgment, or give the appearance that judgment may be affected.

7 COMPETITION

Suppliers will support the principles of free enterprise and fair competition. Suppliers do not tolerate violation of competition laws. Suppliers and their employees will conduct their operations in accordance with the principles of fair competition and all applicable competition laws.

8 CONFLICT OF INTEREST

Suppliers should avoid conflicts of interest between their dealings and their responsibility towards Alewijnse. Prior approval by Alewijnse is required for the fulfillment of (private) functions that may interfere adversely with the interests of a Alewijnse company.

9 SAFEGUARDING INFORMATION AND ASSETS

- 9.1** Suppliers shall respect and safeguard the personal data and assets of Alewijnse, including Alewijnse's intellectual property rights. Transfer of technology and know-how shall be carried out in a manner that protects intellectual property rights.
- 9.2** Suppliers shall not release privileged Alewijnse information beyond limits established in the normal course of fulfilling the Suppliers' role.

AUDITS VIOLATION VIOLATION OF THE SUPPLIER CODE OF CONDUCT

Suppliers shall promptly report to Alewijnse any known breach of this Suppliers Code of Conduct and implement a corrective action plan to cure the non-compliance within a specific time period.

Such a plan is to be furnished to Alewijnse in writing. Alewijnse may also request Suppliers to implement a corrective action plan if a breach of this Supplier Code of Conduct is brought to the attention of Alewijnse by other means or if allegations of the sort are published in the media.

If the Supplier fails to meet the corrective action plan commitment, Alewijnse may terminate the business relationship, including suspension of future orders.