

Our ethics, our guidelines.

Code of Conduct

neelevat

Version 1.0

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Table of contents

| | |
|---|-------------------------------------|
| Introduction..... | 3 |
| Revision Table..... | 3 |
| Audit Table | 3 |
| <i>Purpose and scope</i> | <i>3</i> |
| <i>Values and principles</i> | <i>3</i> |
| Standards of Behavior in the Work Environment | 4 |
| <i>Equal opportunities and diversity.....</i> | <i>4</i> |
| <i>Health and safety</i> | <i>5</i> |
| <i>Respect and anti-bullying behaviour.....</i> | <i>5</i> |
| <i>Company property and resources</i> | <i>5</i> |
| Business integrity | 7 |
| <i>Anti-corruption and anti-bribery</i> | <i>7</i> |
| <i>Fair competitive behaviour.....</i> | <i>7</i> |
| <i>Conflicts of interest</i> | <i>7</i> |
| Protection of Business Data and Information | 7 |
| <i>Data protection and privacy</i> | <i>7</i> |
| <i>Information security and confidentiality.....</i> | <i>7</i> |
| Social responsibility..... | 7 |
| <i>Environmental responsibility.....</i> | <i>7</i> |
| <i>Human rights and labour standards.....</i> | <i>7</i> |
| Reporting Compliance..... | 7 |
| <i>Compliance with legislation and business rules</i> | <i>7</i> |
| <i>Incident and Violation Reporting Mechanism</i> | <i>8</i> |
| <i>Compliance training and support</i> | <i>8</i> |
| Conclusion | 8 |
| <i>Responsibility for compliance</i> | <i>8</i> |
| <i>Signature of the management</i> | <i>Error! Bookmark not defined.</i> |

Introduction

This Code of Conduct describes the principles and the way in which Neele-Vat works together with each other, partners, and customers. Neele-Vat focuses on the long term and considers ethical business operations to be of paramount importance. In this Code of Conduct, Neele-Vat describes how it implements governance and ethical business operations.

This Code of Conduct applies to all colleagues at Neele-Vat. The requirements for conduct and governance of our business partners are further elaborated in our Supplier Code of Conduct.

Revision Table

| Revision No: | Revision date: | Overhaul: | Who: |
|--------------|----------------|--|------|
| 0.1 | 02-12-2024 | Draft policy | |
| 0.2 | 02-01-2025 | Draft policy 0.2 review management | |
| 0.3 | 13-01-2025 | Final draft based on management review | |
| 0.4 | 31-01-2025 | Final draft based on final review Lars | |
| 1.0 | 05-02-2025 | Final version | |

Audit Table

| Audit date: | Hyperlink to form: |
|-------------|--------------------|
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Purpose and scope

The purpose of the Code of Conduct is to inform colleagues, partners and customers about the principles, assumptions, and behavioural requirements that Neele-Vat sets for ethical and ethical business operations and ethical behaviour.

This Code of Conduct is the property of the Board of Directors of Neele-Vat Logistics B.V. (Neele-Vat). The Management is responsible for ensuring that it is known and complied with. The Executive Board ensures that all aspects of the Code of Conduct are anchored in the organisation.

The Executive Board reassesses the Code of Conduct annually and where adjustments are necessary, they are only implemented after consultation with the Works Council.

Values and principles

As a family business, Neele-Vat strives to create a fun, good and safe working environment and working atmosphere and likes to do this together with all the people within the organization.

The existing corporate culture is strong and should be preserved. The culture is supported by the following core values:

Core Values

As an entrepreneurial family business

- We are flexible when needed and listen to our customers' wishes
- We seize opportunities as they arise
- To be successful, we promote entrepreneurship and individual initiative
- With short lines of communication, we make decisions quickly

With loyalty to customers and partners

- We support each other, our customers, and our suppliers
- If something doesn't work right away, we don't give up
- We are proud of our company
- We act with respect for our environment

We act openly and honestly

- We trust one another
- Problems are addressed openly and tackled together
- We support each other in seizing opportunities
- We talk with each other, not about each other

For solid results

- Our company is focused on the long term
- We aim for flawless execution of our services
- We invest today to benefit tomorrow
- We deliver solid results based on a strong financial foundation

Standards of Behaviour in the Work Environment

Equal opportunities and diversity

Neele-Vat refrains from discrimination regarding employment based on gender, race, religion, age, disability, sexual orientation, nationality, political opinion, or social or ethnic origin.

Transgressive behaviour, such as sexual harassment, discrimination and bullying, will not be tolerated. Everyone at Neele-Vat should feel safe. Neele-Vat really value this.

We promote a culture of open, honest, and respectful communication and encourage colleagues to talk to each other about what behaviour they experience as transgressive or undesirable. A colleague must be able to indicate which behaviour is not pleasant for him or her and where the personal boundaries lie. This provides clarity and helps the other person gain insight into the effect of his or her behaviour. We expect these limits to be respected and, where appropriate, to apologize.

If an employee finds it difficult to start the conversation, he or she can contact the confidential advisor, HR, or manager. We take every report of undesirable or transgressive behaviour seriously and together we look for a suitable solution and possible disciplinary measures, based on hearing both sides.

Making direct and/or indirect negative statements and performing actions that may infringe on the good name and/or reputation of Neele-Vat, customers and service providers is also not accepted and will lead to disciplinary measures.

Diversity is a strength for the family business. Neele-Vat is convinced that different backgrounds, experiences, and perspectives of colleagues contribute to a stronger, more resilient, and more innovative company.

Diversity is promoted by creating equal opportunities for all, providing training and development, and organizing inclusive leadership.

Health and safety

For Neele-Vat, safe and healthy working is the basis of a healthy organisation and is described in the Vitality & Safety policy. Neele-Vat always ensures that colleagues can carry out their work safely and healthily by providing insight into the risks and structurally arranging the necessary measures to cover those risks through physical measures, procedures, and work instructions.

Colleagues and third parties are required to comply with the measures always laid down in procedures and work instructions and to make them negotiable where the risks or measures have not been accurately assessed.

Respect and anti-bullying behaviour.

Within the organization, we treat each other with respect, regardless of origin, age, religion, nationality, sexual orientation, or position. Neele-Vat wants everyone to respect the other. In dealing with each other, trust, collegiality, friendliness, and open communication are very important.

Neele-Vat is also clear about undesirable behaviour. For Neele-Vat, undesirable behaviour is when behaviour by one person is experienced as undesirable by the other. Undesirable behaviour can cause stress and lead to physical and mental complaints in the person(s) involved. Neele-Vat is committed to a pleasant working environment for everyone and tries to prevent and combat undesirable behaviour by giving colleagues the opportunity to discuss this with managers, HR, or a confidential adviser.

Company property and resources

Neele-Vat makes company property and resources available to colleagues for the proper and safe execution of their work. Neele-Vat is careful with company resources and expects the same from colleagues. They represent the company to customers and Neele-Vat expects them to be representative to the customer.

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LOGISTICS

Our organization's goal is to be the best family-owned logistics company. Our talented people deliver flawless services that show our customers they are valued, and our progress is continuously measured. Our core values are of paramount importance in this regard: As an entrepreneurial family business with loyalty to our customers and partners, we act openly and honestly to achieve solid results. These standards and values are translated into a number of clear rules of conduct, which are set out below. These apply to everyone who works at Neele-Vat.

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|---|--|--|
| <p>Our employees comply with the laws and regulations that arise from and are laid down in our certifications and permits.</p>  | <p>Our employees keep their workplace clean and tidy, as well as the equipment they work with.</p>  | <p>Our employees are aware of the applicable rules regarding safety in the workplace and comply with them.</p>  |
| <p>Performing secondary activities is only permitted after approval has been given by the employer.</p>  | <p>Our employees are aware that they may not be involved in or actively participate in any form of bribery or other forms of corruption.</p>  | <p>Our employees refrain from theft, fraud, sabotage, smuggling, or sharing information about the flow of goods. This ensures that the safety of goods and people is not compromised.</p>  |
| <p>Our employees do not make any direct or indirect negative comments about Neele-Vat and do not engage in any activities that could damage the good name and/or reputation of the company.</p>  | <p>Our employees are always respectful and friendly in verbal contact with customers and external relations, as well as in contacts by email, telephone, and social media.</p>  | <p>Our employees treat each other with respect and refrain from discrimination and/or (sexual) harassment, aggression, bullying, and violent behavior toward customers, colleagues, service providers, and guests.</p>  |
| <p>The use of alcohol or drugs while performing work is not permitted. Smoking is only permitted in the designated shelters.</p>  | <p>Our employees will not be involved in any way whatsoever in any form of human trafficking or child labor.</p>  | <p>When there unfortunately abuses are reported by our employees within the organization, they will report these to their manager or confidential advisor.</p>  |

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Business integrity

Anti-corruption and anti-bribery

Neele-Vat guarantees that it does not engage in corrupt practices, including public or private bribery or bribery and undermining. She offers colleagues sufficient training to make them aware of the risks involved, makes it clear when colleagues should report to their manager and offers them tools to deal with it.

Fair competitive behaviour

Neele-Vat offers services at fair rates and respects the laws and regulations that maintain and promote competition and prohibit collusion and the conclusion of price agreements between them.

Conflicts of interest

Neele-Vat mentions the occurrence of conflicts of interest in the employment contract, makes any conflicts of interest negotiable, makes her colleagues aware of possible conflicts of interest through training and ensures appropriate decision-making and follow-up in the event of a conflict of interest.

Protection of Business Data and Information

Data protection and privacy

Neele-Vat considers careful handling of personal data to be of the utmost importance. Neele-Vat uses the Privacy Policy and the privacy statement for this. Personal data is carefully processed, secured, and treated confidentially by Neele-Vat, which meets the requirements of the General Data Protection Regulation (GDPR). Neele-Vat keeps an accurate processing register of the processing of personal data.

Information security and confidentiality

Neele-Vat, we maintain strict confidentiality and secrecy with regard to all confidential information about the company, customers, and relations. We define "confidential data" as any data that has not been made public by us. All colleagues are made aware of the rules regarding this confidentiality through training.

Social responsibility

Environmental responsibility

Neele-Vat is committed to contributing to the reduction of CO₂ emissions and air pollutant emissions within the transport and logistics sector, in line with the global climate goals. The focus is on taking measures to make the operation more energy efficient.

Human rights and labour standards

Everyone who works at and for Neele-Vat has the right to fair, healthy and safe work. Fair work includes decent pay, equal treatment, and decent working hours. Neele-Vat only does business with employment agencies that are ABU or NBBU recognized. Neele-Vat will not be or become involved in any form of human trafficking, forced or child labour in any way.

Reporting Compliance

Compliance with legislation and business rules

Neele-Vat complies with laws and regulations that apply to the work that is carried out and that are related to the certifications and permits.

Neele-Vat strives for a safe and healthy working environment and does not tolerate incidents. The regulations in the field of safety and the environment are strictly adhered to and the violation of occupational health and safety and environmental legislation is always prevented.

Neele-Vat disapproves of any form of theft or fraud. There is a zero-tolerance policy for this and in case of criminal activity, a report is made to the police.

Colleagues who come into contact with the police and/or investigative services and court cases and convictions in connection with theft, fraud, sabotage, and/or smuggling must inform their manager immediately.

Incident and Violation Reporting Mechanism

Neele-Vat has its Vitality and Safety policy and clear procedures for being alert to possible safety risks and the way in which (near) incidents must be reported. The procedures ensure that our SHEQ has an overview of all (near) incidents, enabling them to take adequate measures.

In the unlikely event that safety risks are identified by our colleagues at Neele-Vat, they report them to their manager or confidential advisor. Depending on the nature of the risk, action is taken in the form of procedural changes.

In the event of undesirable/illicit behaviour being identified, this will be reported to managers or confidential advisers. In the event of personnel measures or sanctions, these will be confirmed in writing and this letter will be included in the personnel file.

Compliance training and support

Neele-Vat offers a wide range of training courses to inform all colleagues, depending on their specific work, appropriately and sufficiently about the applicable rules and to give them the opportunity to master the associated skills. Records are kept of this training curriculum and participation in it.

Conclusion

Responsibility for compliance

The Board of Directors of Neele-Vat is responsible for compliance with this Code of Conduct at all times and accounts annually for its progress in the field of ESG. It does not do this purely from the point of view of taking responsibility, but from the conviction that honest and transparent behaviour is essential for building a sustainable and strong organisation.