



Code of Conduct

Date of revision: 23/09/2024



2024





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Message from the CEO

To all EOC Group employees,

The EOC Group is unwavering in its commitment to the highest standards of compliance and business ethics. These principles form the foundation of our business success and are crucial in today's global marketplace for being chosen as a preferred business partner by our customers.

We aspire to reach a point where adherence to compliance standards is instinctive and not open to interpretation. To further support our compliance-driven organization, we have updated our Code of Conduct. This document is designed to be your guide, and I encourage you to familiarize yourself with its principles and rules. Should you have any questions, please seek guidance.

I want to emphasize our zero-tolerance policy for breaches of compliance guidelines. We expect you to promptly report any concerns or unacceptable behaviors to your supervisors or through the corporate whistleblowing hotline.

We are dedicated to providing the necessary support to reinforce this core value of integrity. Let us all commit to upholding the EOC Group's Code of Conduct to ensure our continued progress and success.

Sincerely,

Gerard Marsman

CEO

EOC is committed to managing its business in accordance with its declared values. These values recognize that good social citizenship, reflected in the way we interact with our employees, business partners and host communities, is an essential ingredient in creating and maintaining a sustainable future.



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Introduction to the Code of Conduct

Who is the Code of Conduct applicable to?

This Code of Conduct applies to all employees, officers, directors, and agents of the EOC Group, including temporary and contract workers. It is designed to guide our actions and decisions in the workplace, ensuring that we uphold the highest standards of integrity and ethical behavior.

All individuals covered by this Code are expected to read, understand, and adhere to its principles and guidelines. Compliance with the Code is mandatory and non-negotiable. Any violations of the Code may result in disciplinary action, up to and including termination of employment or contract.

Furthermore, this Code extends to all business activities and interactions, both within the company and with external stakeholders, including customers, suppliers, and partners. It is our collective responsibility to ensure that our conduct reflects the values and standards set forth in this Code.

What is the purpose of the Code of Conduct?

The purpose of the Code of Conduct is to establish a clear framework of ethical standards and guidelines for behavior within the organization. Here are some key objectives:

- **Promote ethical behavior:** it sets out the principles and standards that all employees, officers, directors, and agents are expected to follow, ensuring that everyone acts with integrity and honesty.
- **Ensure compliance:** the Code helps ensure that the organization complies with all relevant laws, regulations, and internal policies, reducing the risk of legal issues and promoting a culture of accountability.
- **Protect the organization's reputation:** by adhering to high ethical standards, the Code helps maintain and enhance the organization's reputation with customers, partners, and the public.
- **Provide guidance:** it serves as a practical guide for employees, helping them make informed decisions and handle ethical dilemmas in their daily work.
- **Foster a positive work environment:** the Code promotes a respectful and inclusive workplace, where all employees feel valued and are treated fairly.
- **Support whistleblowing:** it encourages employees to report any unethical behavior or violations of the Code without fear of retaliation, ensuring that issues are addressed promptly and appropriately.

How to use this Code of Conduct?

Everyone is expected to read and understand the guiding principles covered in this document and apply them to their daily work and activities.

The principles contained in the Code of Conduct are the foundation of our policies and inspire practices, guidelines and operating procedures adopted by the Group. Whenever more detailed clarifications are needed on how to implement the Group's values and culture in operational practices, specific guidelines will be issued to supplement those already existing.

The Code of Conduct also indicates how to report violations of the Code and the measures to be applied in the event of violations.



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What EOC Code of Conduct means to each of us

Our responsibilities

Compliance is everyone's responsibility. Everyone is responsible for being trained on understanding and applying relevant laws and regulations, EOC's ethical standards, policies and procedures. Everyone has an obligation to report concerns regarding non-compliance with written standards and EOC's ethical standards.

Additional responsibilities for EOC directors and managers:

- Directors and managers are expected to lead by example when applying relevant laws and regulations, and EOC's Code of Conduct policies and procedures to their day-to-day activities.
- The compliance performance of directors and managers is a critical part of their management performance.
- Directors and managers must guide and train employees under their supervision and ensure that their employees follow all laws and regulations and EOC's Code of Conduct policies and procedures.

Ensuring compliance with laws, regulations, and the EOC Code of Conduct is everyone's responsibility at EOC. When the right course of action is unclear or something seems off, we should ask questions or report our concerns. Failing to do so can harm EOC's business and reputation. If we are unsure whether our actions or those of our colleagues comply with the policies and procedures, or if we become aware of any non-compliance, we should speak with our manager or consult the HR department or other relevant departments. Promptly reporting compliance concerns allows the company to investigate and take appropriate actions sooner.

Whistleblowing Hotline

Why should you report a concern?

We all share the responsibility to live our values every day: that includes keeping an open dialogue by asking questions when we don't know what to do; reporting concerns related to our business activities; raising a concern on non-compliance issues. Our active commitment fosters a culture of compliance. Your actions can make a difference.

How to report?

All our EOC employees can report an incident via a direct link on our intranet page. For our external partners we foresee a possibility to make an anonymous notification via the EOC Group website.

What can be reported?

Employees are encouraged to report any concerns or violations related to our Code of Conduct, company policies, or applicable laws and regulations. This includes, but is not limited to, unethical behavior, harassment, discrimination, safety violations, financial misconduct, and any other actions that could harm EOC or its stakeholders. If you observe or suspect any such issues, it is your responsibility to report them promptly. Reports can be made to your manager, the HR department, or through other designated reporting channels. All reports will be taken seriously and investigated thoroughly. For detailed information please refer to our Whistleblowing policy.



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Commitment to non-retaliation

EOC is committed to fostering an environment where employees feel safe to report any concerns or violations of our Code of Conduct, policies, or applicable laws. We strictly prohibit any form of retaliation against individuals who, in good faith, report suspected misconduct or participate in an investigation. Retaliation can include, but is not limited to, harassment, discrimination, or any adverse employment action. Any employee found to be engaging in retaliatory behavior will face disciplinary action, up to and including termination. If you believe you have experienced retaliation, please report it immediately to your manager, the HR department, or another appropriate channel.

Respect for Human Rights

EOC is committed to the principles expressed in the United Nations Declaration of Human Rights (and its protocols) and the fundamental Principles and Rights at Work developed by the International Labour Organization in all of the countries in which it has (or will have) a presence.

We understand that the diversity of our various cultures and values is one of our greatest assets and we will respect this diversity: we do not tolerate the use of modern slavery such as child labour, forced labour, human trafficking or any other behaviour that does not maintain human dignity; including by third parties or their supply chains.

Key points

You should:

- respect the rights of all people in the way we conduct our business.
- respect others who have different values and beliefs.

You should not:

- speak or act in ways that affront to human rights or the personality of others.

Child labour

EOC does not employ in any way, any individual who has not either reached the mandated school-leaving age or the minimum age set for employment in any country in which it operates. Notwithstanding the above, EOC supports initiatives such as work experience and Summer/vacation employment for Second Level and College students with the intention to provide the participants with an introduction to business and the marketplace.

Forced labour and abuse

EOC is committed to treating its employees in a humane manner and does not countenance or condone forced labour, physical or mental abuse. EOC does not tolerate any other form of abusive behavior not only in respect of its employees, but also in respect of those whom we conduct business with, e.g., suppliers, customers, members of host communities, local and national officials.



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Harassment

What is harassment?

Harassment is unwelcome conduct or abuse that causes a significant disadvantage or mental anguish to the individuals – even when you think that you have only spoken or acted in a casual manner.

Everyone has the right to work in a place that is free from harassment, and no one should engage in conduct that constitutes harassment. We are all expected to support a harassment free workplace.

We must make a report about whether we or our colleagues are the victims of harassment. EOC does not tolerate anyone making sexual advances towards a colleague in the workplace or work-related environment or taking intimidating or offensive actions that create a hostile working environment.

Key points

You should:

- treat everyone with respect and professionalism, and as business colleagues, not social friends.

You should not:

- speak or act in ways that aggravate the working environment of your workplace.
- including sexual advances or speech and jokes about race, age, religion, disability or sexual orientation.

Diversity and non-discrimination

As a multinational company, EOC values the differences reflected in its' diverse workforce. EOC is committed to a working environment which rejects discrimination on any grounds. They value a diverse workforce and expect managers to observe applicable laws against all kinds of discrimination. Employment decisions like hiring, equal pay, title, promotion, discipline, termination, or working conditions should be based on a person's ability or performance, not irrelevant personal factors.

For purposes of this Code of Conduct, discrimination happens when qualified individuals are penalized at work due to unrelated personal factors like gender, gender identity, expression age, nationality, race, ethnicity, skin color, or cultural background, religion or belief, disability, genetics, or health information including pregnancy, sexual orientation, caste, and union affiliation.

Freedom of association

EOC recognizes the right of the employees to become, and remain, members of Trade Unions and the right of their representatives to negotiate and bargain collectively on their behalf. In circumstances where Freedom of Association and Collective Bargaining are restricted (or prohibited) under legislation, EOC works with its employees, where they wish to do so, to establish alternative means of representation that are mutually acceptable. EOC provides reasonable access for employee representatives and ensures that they do not suffer any disadvantage or discrimination because of their role as a representative.



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Conflict of Interest

What is conflict of interest?

A conflict of interest arises whenever a personal interest influences your decision making as an EOC employee. This interest can relate to yourself, a family member, or a close friend.

What does it mean for EOC?

You make business decisions based solely on objective professional grounds, without seeking personal benefits or being influenced by personal connections. You are transparent about any personal interests you may have.

Examples of potential conflict include:

- Accepting cash gifts or invitations from a business partner.
- An HR employee assesses a job candidate who is related to her or him.
- Conducting business with a company owned by a family member or friend.

Key points

You should:

- declare any potential conflicts of interest according to EOC regulation.

You should not:

- be influenced in our business activities by relationships with close friends and family members.

If you declared the conflict of interest form and no conflict of interest existed at the first day that you joined EOC, it is still necessary to declare until you leave as your conflict of interest may be changed from time to time. Any change to the current circumstance which may lead to an actual conflict of interest needs to be declared.

Fraud

What is Fraud?

Fraud is defined as intentional false representation or concealment of a significant fact, which leads someone to act upon it to their detriment.

What does it mean for EOC?

Everyone must be trained to understand and apply our code of conduct policies and procedures in their daily work. Each director and manager should be aware of the types of irregularities that might occur in their area of responsibility, and we should all stay vigilant for any signs of irregularity.



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Examples of fraud in business:

- fictitious purchase orders.
- falsifying documents or transactions.
- entertainment without legitimate business purpose.
- stealing cash or equivalent such as inventory equipment for supplies.

You should:

- be aware of the types of irregularities or fraudulent contact that might occur within our area.
- report any effort to engage in fraud, negligence or improper manipulation immediately to management.

You should not:

- request reimbursement of expenses which you have not made or were related to a non-professional nature.

Anti-corruption

EOC is committed to acting lawfully, ethically, with integrity and responsibility in the way we operate towards our people, organization, communities, business partners and markets. EOC also expects from all parties concerned to conduct business in an ethical and lawful manner, act with integrity and in compliance with all applicable laws, including anti-bribery and anti-corruption laws.

EOC does not tolerate bribery, including facilitation payments, in any of its business dealings, whether conducted directly or through third parties acting on our behalf. We will not directly or indirectly engage in bribery or any other similar provision or receipt of improper benefits in any form. We will not provide or receive any gifts entertainment or other benefits unless permitted under the applicable laws regulations and internal company rules and only within the limits of generally accepted social standards.

You should

- follow written standards for dealing with third parties, whether they are public officials or any other individual or organizations.
- be aware that violation of laws relating to bribery may result in criminal charges, not only against EOC but individuals as well.
- obtain approval for all gifts, hospitality and expenses in accordance with company regulations.
- consult your manager or management team if you are unsure of our conduct.

You should not

- give, promise, or offer anything of value that could be seen as an inducement for improper conduct.

Gift acceptance

Business gifts may be a cultural courtesy provided to or given by EOC to recognize occasions such as national holidays like Christmas. EOC sets limits on gifts through the gift acceptance procedure outlined in the HR handbook. According to this procedure, EOC employees are allowed to receive gifts under the following conditions:

- Gifts up to €25 do not require declaration.
- Cash and cash equivalents are not accepted, regardless of the value.
- Gifts valued above €25 must be reported to your line manager and the HR department.



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Key points

You should:

- make sure that gifts and other benefits are provided and received infrequently at the right time and with the right intent and are always modest and appropriate.
- get prior approval to provide any gift or benefit to third party and/or government official.

You should not:

- receive any vouchers (cash and cash equivalents) or expensive gifts.

Employee respect

EOC values the contribution made to the business by its employees. It is committed to creating and maintaining a working environment which is safe, respects individuality, is non-discriminatory, appoints and promotes employees based on suitability, rewards fairly, encourages (personal and professional) development, and has effective mechanisms of communication.

Fair compensation

EOC ensures that the pay rate for the standard working week (or part thereof in the case of part-time employees) in each country in which EOC operates, at least matches the minimum standard set by the local government or legislature. If no such standard is in place, EOC makes use of accepted industry standards or recognized norms to determine or adjust the relevant pay rates. EOC maintains the practice of reviewing all wage and salary levels in accordance with the relevant collective agreements or, where none exist, at appropriately regular intervals.

Employee development

Continuous training and development of employees is a key objective of EOC, to encourage each employee to reach their maximum potential. EOC supports learning and development programs reflecting the necessity to constantly review and, where the necessity arises, raises the standards of business performance. EOC encourages the exchange of "best practices", knowledge and skill transfer, health and safety, and commitment.

Communication

EOC highly values transparent communication with external stakeholders and employees. They have regular and efficient meetings with their employees and representatives, conducted in an open and constructive manner, to exchange views on all matters affecting the business including health and safety, working conditions, terms and conditions of employment and the performance of the business. EOC makes use of the appropriate media which include departmental and function meetings, employee representative meetings at local levels, internet, newsletters, e-mailing, e-meetings, etc. Any complaint related to the environment, ethics and sustainability can be reported through the reporting procedure on the company website.



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Community involvement

EOC recognizes that its plants, wherever situated, are a part of that local environment and community. As a socially responsible organization, EOC is committed to developing a constructive and mutually supportive relationship with the host communities in whose domicile we are privileged to operate. Consequently, appropriate community activity and involvement is both encouraged and promoted.

Environment

EOC is committed to the 17 UN Sustainable Development Goals. EOC strives to search for sustainable raw materials and processes to offer alternatives to the market. EOC is continuously improving its processing to produce in the best possible sustainable manner. Our aim is to efficiently use resources, minimizing material and product wastage, promoting the circular economy, and optimizing transportation requirements.

Social media

When an employee shares information or references EOC on their social media, EOC expect this to be done respectfully and professionally. Negative comments about EOC as a company or colleagues are not appreciated. Users should be transparent about their identity when representing EOC online.

Users should respect the privacy and confidentiality of others. They should not share or disclose sensitive or confidential information without proper authorization. Any content shared must be accurate, reliable and does not spread misinformation or disinformation.

Any users representing EOC online should be mindful of their personal and professional reputation when using social media. They should avoid engaging in discussions that could damage their own or EOC's reputation. EOC reserves the right to take the necessary steps to protect affected employees and the company EOC in these cases

GDPR

We want to be a great company. In order to achieve that goal we are committed to work in the right way. We are committed to protect your privacy and to process your personal data in an open and transparent manner, in particular with respect of the General Data Protection Regulation 2016/679 of 27 April 2016 ("GDPR").

For detailed clarification on this matter, please refer to the EOC GDPR policy available on the company website www.eocgroup.com.

