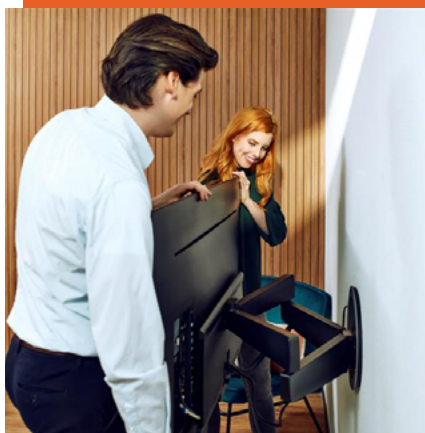




# Vogel's Code of Conduct



**Vogel's.** For Sure.

# Index

Introduction

Chapter 1. Integrity & non discrimination

Chapter 2. Environment

Chapter 3. Health, safety and labor conditions

Chapter 4. Quality

Chapter 5. Privacy and security

Chapter 6. Intellectual Property

Chapter 7. Compliance

- Competition Law
- Anti-Bribery
- Anti-Money Laundering and Counter-Terrorism Financing Act

Commitment

# Introduction

## **What is the Vogel's Code of Conduct?**

The Vogel's Code of Conduct sets clear principles for our business conduct and provides useful guidance for management of critical risk areas such as privacy, conflicts of interest, improper payments, environmental impacts and others. Vogel's wants to conduct its business in strict compliance with applicable (local) laws and regulations.

## **Why do we have a Code, and who must follow it?**

This Code of Conduct reflects who we are and what's important to us. That's why we count on every Vogel's Partner\* to follow our Code and make decisions that will preserve the trust that others have placed in us. Failure to do so can result in disciplinary action, including termination of their (employment-) contract.

We encourage you to read our Code of Conduct and use it to guide your actions.

## **What we stand for – Our key values**

Customers always expect us to exceed their expectations. To maintain our position as market leader we need to embrace a corporate culture that revolves around improving, innovating and getting things done. With our core values we express what we stand for. They inspire everything we do.

Accessible, positive and exploring. At Vogel's we consider these key values to be very important. They make us strong and one of a kind. Live our values every day; in our work and collaboration with others. That's how we continue to maximize the attraction of the Vogel's brand and strengthen our reputation.

\*Vogel's employees, Vogel's distributors, suppliers, contractors, subcontractors, consultants, and joint venture partners (hereinafter: Vogel's Partners).

## Where can you go for advice and guidance on our Code?

We have processes, guidance and procedures in place to help you follow this Code, Company policy and the law. Take advantage of the resources and expertise that exist within Vogel's, including:

- **MANAGERS AND TEAMLEADERS** are available to answer questions and are generally most familiar with the Company guidelines.

- **HRM** can explain and answer questions about employment policies, benefits and workplace issues.

- **LEGAL DEPARTMENT** can help explain and interpret this Code and can provide guidance about how to conduct business with and/or on behalf of Vogel's in compliance with the law.

- **QUALITY CONTROL** can explain and answer questions regarding the quality, safety, efficacy and regulatory compliance of our products, including environmental, health and safety conditions.

# Workplace

## Chapter 1. Integrity & non discrimination

Vogel's Partners shall commit to act fairly and with integrity and are expected to comply with all applicable local rules and regulations.

### How we treat one another

At Vogel's we treat each other with respect and dignity. This means that our employees are entitled to work in an environment that is free of harassment and discrimination. Vogel's strives to use the highest standards of ethics that are required to meet all these social responsibilities, including rules relating to business integrity, unfair advantage, disclosure of information, intellectual property, fair business, advertising and competition, protection of identity, and community engagement.

### Non discrimination

Vogel's promotes equal opportunity in its hiring practices and makes recruiting decisions based solely on job-related criteria. Vogel's Partners

shall treat its employees equally in employment and occupation, and will ensure that each has equal opportunities. Vogel's Partners shall offer equal pay for equal work performed at equal levels. No form of harassment or discrimination in respect of employment and occupation will be tolerated, such as discrimination based on race, color, sex, age, language, religion, political or other opinion, national or social origin, property, birth or other status.

### Diversity

Vogel's creates and promotes an environment that is inclusive of all people and their unique abilities, strengths and differences. We respect diversity in each other, our customers and all other Vogel's Partners with whom we interact.

### Workplace Health, Safety

Vogel's Partners are expected to follow all safety rules and practices. In order to enhance the workplace environment, you should be familiar with and follow any work safety information and training provided to you.

# Our commitment to sustainability

## Chapter 2. Environment

Vogel's aims to positively influence the environment. When developing products, we take into account the origin of the raw materials and the way a product is made. Vogel's makes effort to implement adequate measures to prevent or minimize adverse effects on the community, natural resources and the overall environment. Therefore, we ask Vogel's Partners to take appropriate measures to assure a sustainable business and manufacturing procedure with an efficient waste disposal.

Vogel's strives to make our products more sustainable, whereby Vogel's find it important that they retain the characteristic Vogel's quality. Wherever we operate, we work to ensure the best possible working conditions for all related employees as well as in the production partners in Europe and Asia.

Vogel's strives to limit our impact on the environment as much as possible. The best way to save raw materials is to make high quality products. Partly by using high quality materials and stringent quality testing, Vogel's extends the lifespan of its products. In this way we can contribute to a circular economy and the preservation of raw materials.

Vogel's focuses on the following areas:

1. Social impact
2. Sustainable product design
3. People
4. Efficient Supply Chain
5. Facilities

To achieve these goals, Vogel's and our partners must continuously work on improving activities and processes, for a better planet.

# Business Practices

## Chapter 3. Health, safety and labor conditions

Vogel's Partners must comply with the Vogel's Code of Conduct, which protects the working conditions and rights of their employees.

Vogel's Partners shall do all that is reasonable and practicable to:

- Ensure compliance with national and international health and safety regulations;
- Protect the health and safety of employees and contract labor and minimize any adverse work conditions;
- Implement safe and healthful work practices to prevent injury, illness, (virus)epidemics and property damage;
- Minimize occupational exposures to potentially hazardous materials and unsafe work conditions by maintaining appropriate safety systems and effective controls;
- Implement an emergency response program that addresses the most likely anticipated emergencies;

- Train managers and employees to assure their continued commitment to their own health and safety and that of their co-workers;
- Involve employees at all levels in the health and safety program; assure their accountability for injury and illness prevention.

Vogel's Partners shall not employ children in violation of convention 138 and 182 of the International Labor Organization. In case of child labour, Vogel's shall take immediate remedial action in consultation with the related partner, considering the interests of the children employed.

This action will include:

- The obligation of the Vogel's Partner not to employ children;
- Minimally acceptable employment conditions for all employed (such as education, working hours, wages, medical facilities etc.);
- A time period within which the Vogel's Partner will comply with mentioned ILO norms.

Employment should be freely chosen. Under no circumstances will any Vogel's Partner make use of forced or bonded labor – such as forced labor performed by persons placed in an institution, or compulsory labor including labor as a means of political coercion or education – to design, manufacture or assemble products and services for Vogel's. Vogel's Partners shall recognize and respect the freedom of its employees to choose whether or not to establish or to associate with any organization of their own choosing (including labor unions) without Vogel's Partners' prior authorization. The employment of a worker shall not be contingent upon the condition that he/she not join a union or be forced to

relinquish trade union membership. Furthermore, union membership shall not be the cause for the dismissal of – or otherwise prejudice against – a worker.

### Collective bargaining

Vogel's Partners shall respect – within the framework of law, regulations and prevailing labor relations and employment practices – the right of its employees to be represented by labor unions and other employee organizations. Vogel's Partners will engage in negotiations, either on its own behalf or through employers' associations, with a view toward reaching agreement on employment conditions.



# Quality

## Chapter 4. Quality

Vogel's Partners value high quality. Continually improving our products and services is our way of work. Design and innovation are our second nature. Quality is one of our key component that is incorporated throughout the workflow of Vogel's.

Vogel's Partners must:

- Have a ISO 14001 and ISO 9001 certification or shall intend to become

certified. Alternatively, Vogel's Partners must provide documented objective evidence of an operational environmental management system, or demonstrate equivalency which shows continuous environmental improvement.

- Sign a Declaration of Compliance in order to ensure their compliance with all applicable (local) law and regulations.
- Sign and comply with the Certificate of Conformity (VPS).

# Safeguarding information

## Chapter 5. Privacy and security

Vogel's respects the privacy of all his employees, partners and customers. We ensure that the personal data we store in order to do business is kept securely and not distributed without a legal basis, in accordance with the GDPR. We also ask this from all our Vogel's Partners.

Every Vogel's Partner is responsible for protecting Vogel's (confidential)

information entrusted to you and for helping to protect the Vogel's assets in general. Therefore protect the Vogel's data with the utmost care, encrypt or password-protect the Vogel's data and do not share your various personal accounts and passwords with others.

Report any (internal/external) risks or incidents at [privacy@vogels.com](mailto:privacy@vogels.com).

# Intellectual Property

## Chapter 6. Intellectual Property

Every Vogel's Partner has a responsibility to safeguard the Vogel's trademark. Vogel's intellectual property is the key to our competitive advantage. We protect and respect Intellectual Property.

Vogel's contributes to the establishment of a networked society by continuously creating new value and providing products and services on a global basis to meet customer needs. The Intellectual Property that results from our large investment in R&D is of great value to us. We

are fully aware that our Intellectual Property is a valuable asset and an essential management resource underpinning our business activities and the confidence our customers place in us. We will make every effort to obtain and maintain all necessary Intellectual Property rights, including patents, copyrights and trademarks, and utilize them effectively in growing our business. We recognize that the knowledge and know-how held by each employee gives us a competitive edge in our business activities. We respect third-party Intellectual Property and utilize it only after having properly secured rights to its use.

# Compliance

## Chapter 7. Compliance

### Competition law

Every Vogel's Partner has a responsibility to comply with all applicable competition laws, regulations, decrees and orders. Vogel's Partners shall not collude with other companies on price or terms to be offered to customers; agree with competitors to allocate markets or customers; or manipulate the bidding process.

### Anti-bribery laws and avoiding Conflicts of Interest

Bribes are illegal payments or other types of compensation made to influence and gain profit from an individual, company or government official. Vogel's Partners shall not, and shall not attempt to, influence government policy or obtain or retain business by means of illegal payments, bribes, kickbacks or other illegal methods. Bribes or other means of obtaining undue or improper advantage are not to be offered or accepted.

Anti-bribery laws prohibits payments, offering or authorized gifts of anything of value, either directly or through a third party (for example, a distributor, agent, consultant, etc.), to government officials, political parties, politicians, or political candidates with the intent to obtain or retain business, direct business to any person, obtain an improper business advantage or influence an official act or decision of such government official. These anti-bribery provisions apply to companies but also to individuals, such as employees. Any and all forms of bribes, corruption, extortion and embezzlement are strictly prohibited resulting in immediate termination and legal actions. Not actually paying the bribe does not insulate one from liability.

### Anti-Money Laundering and Counter-Terrorism Financing Act

Vogel's Partners are committed to complying fully with all anti-money laundering, racketeering and counter-terrorism laws throughout the world. As Vogel's does business across the globe, we endeavor to conduct business only with reputable customers and suppliers involved in legitimate business activities, with funds derived from legitimate sources. Vogel's Partners will not transact business with any organization that is or has been influenced or compromised by organized crime or terrorism. Failing to detect relationships and transactions that place Vogel's at risk can severely damage our integrity and reputation.

Vogel's Partners must:

- Perform an appropriate due diligence. Every Vogel's Partner is required to implement appropriate due diligence procedures to review risks, including those involving new customers, and to take reasonable steps to prevent and detect unacceptable and suspicious forms of payment.
- Report suspicious activity. If you detect a suspicious transaction, report the matter to your Legal department or supervisor and cooperate with local law enforcement authorities as appropriate.

# Commitment

Every Vogel's Partner must commit themselves to the principles as stated in this Code of Conduct.

It is important to stay diligent and report any concerns or potential violations of the Code of Conduct as soon as they arise to Vogel's Legal department – without exception.

Engaging in transactions that one suspects involve improper payments may lead to liability. Failure to report knowledge or suspicion of such incidents may constitute a violation of the law.

If it is deemed reasonably apparent that an unusual or extraordinary payment is involved, such disregard, blindness, or ignorance will constitute a violation.

Consult with your supervisor or Vogel's Legal department if you have any questions or concerns regarding how to identify, handle and protect these Vogel's Key-principles as stated in this Code of Conduct.


COMPANY:

BY (name & surname):

TITLE/FUNCTION:

Vogel's Products B.V.  
G.P.H. Vogel's  
CEO

SIGNATURE



PLACE/DATE

Eindhoven, 12-7-2021