

## Code of Conduct



At Orga, we are committed to acting responsibly, ethically and with integrity in all our dealings with colleagues, customers, suppliers, and other stakeholders.

Reliability, respect and honesty are values that guide us in the way we at Orga conduct business.

This Code of Conduct is intended to give us guidance on how we want to act and behave as a company and which we use in our day-to-day activities.

We are proud of Orga's stature in the global business community, and we count on each one of you to maintain and enhance our strong reputation through your actions.

Our Code of Conduct applies to everyone at Orga regardless of job function or seniority. In addition, we hold our intermediaries, suppliers, contractors and other business partners to the same or, in some cases, similar standards.

Compliance with the Code of Conduct is important for each one of us at Orga to meet the expectations of our colleagues, customers, suppliers and other stakeholders. Failing to comply with it is a serious violation and jeopardizes Orga's reputation.

Read this document carefully and thoroughly to ensure that you understand how it applies to your job and how to report any potentially unethical behaviour that you become aware of.

Orga Management Team

### Orga BV

Strickledeweg 13  
3125 AT Schiedam  
The Netherlands

### Postal address

P.O. Box 3046  
3101 EA Schiedam  
The Netherlands

☎ +31 (0)10 208 5555

☎ +31 (0)10 437 8445

✉ [info@orga.nl](mailto:info@orga.nl)

🌐 [www.orga.nl](http://www.orga.nl)

# Code of Conduct

## COMPLIANCE WITH APPLICABLE LAWS & REGULATIONS

In addition to Orga's Code of Conduct, all employees must comply with the laws and regulations of the legal system in which they are operating, and comply with the core values as mentioned in Orga's employee manual.

## QUESTIONS AND CONCERNS

This Code of Conduct serves as an important set of guidelines to follow and to assist you if you are ever in doubt about the best course of action. When you face an ethical dilemma, think through the issue and ask yourself:

- Is it consistent with our Code of Conduct?
- How would it appear to others?
- Should I seek guidance?

If you seek guidance when facing a dilemma related to the Code of Conduct, first speak to your manager or to any other manager you feel comfortable with.

## REPORTING

You are required to report any suspected violations to this Code of Conduct to your manager or the Compliance Manager. Orga will investigate all reports promptly, thoroughly and fairly and take appropriate action when necessary. Your identity and any documents related to the report will be kept confidential.

## HUMAN RIGHTS

Orga considers its employees to be its most important asset. We are committed to providing and maintaining a safe and secure workplace for all employees; all employees are given training and the information they need to manage risks in all work areas.

We neither discriminate nor tolerate discriminations and sexual or other personal harassment or any hint of such behaviour.

We work together with people of different genders and ages, different ethnics and colours, cultures, religions, sexual identity and people with disabilities. We respect the personal dignity, the privacy and the personal rights of each person.

## Code of Conduct

These principles do not only govern the internal business relationships but also the business relationships with external partners.

### ZERO TOLERANCE FOR BRIBERY & CORRUPTION

#### BRIBERY

Orga does not condone, engage in or support bribery in any form. Orga employees, and any person or entity acting on behalf of Orga, must not:

- offer, promise or give, nor request or accept, any undue advantage, whether directly or indirectly (i.e. through a third party), with the intention to obtain, retain or direct business or to secure any other improper advantage in the conduct of business.

Gifts and business entertainment are tokens of gratitude in business relations: they must be legal, reasonable and proportionate. Orga prohibits the offer or receipt of gifts and business entertainment whenever such arrangements could improperly affect the outcome of the business transaction.

#### CONFLICTS OF INTEREST

Orga employees must conduct business activities in the best interests of the company and avoid situations that might lead to conflict of interest or loyalty during their work.

Every personal conflict of interest an employee may have in connection with his or her professional duties has to be reported to his or her manager and to the Compliance Manager.

### HANDLING OF COMPANY ASSETS & INFORMATION

#### FRAUD, FINANCIAL REPORTING, DISCLOSURE & TRANSACTIONS

Orga employees must not engage in or support any type of fraud. Employees must carry out all company financial reporting, disclosure and transactions in the best interests of Orga, and uphold Orga's reputation as a responsible and accountable company. Confidentiality should be maintained at all times while dealing with sensitive information relating to Orga.

#### INTELLECTUAL PROPERTY

Employees must protect Orga's own intellectual property and confidential information, and must respect the intellectual property and confidential information of others. Disclosure of intellectual property and confidential information outside of Orga without prior

## Code of Conduct

proper protection can lead to loss of valuable assets as well as our freedom to operate.

### PROPERTY

Buildings, equipment, vehicles, materials and tools used by employees in the fulfilment of their daily work may only be used for business purposes. Exceptions are individually granted by IT and/or Human Resources or, if required, taken care of in individual company agreements.

### PERSONAL DATA & PRIVACY

Every employee provides our company with personal identifying information, including home addresses, national identification numbers (such as social security numbers) and payroll information. Appropriate measures to properly secure personal data are taken at all times. Access to personal data of prospective, current or former employees is limited to employees with proper authorization and will never be shared with anyone unless there is a legitimate business need to do so and sharing it is consistent with applicable laws.

### ENVIRONMENT, SAFETY AND HEALTH

Orga continuously strives for a zero-incident working place, safe, healthy and pleasant working conditions for its employees and to safeguard contractors and visitors to its facilities. We also aim to prevent negative impacts on the environment from the work that we do.

We all have a responsibility to keep ourselves and our colleagues' safe and address each other when observing an unsafe situation.

Incidents and safety issues must be reported to the Safety Team through our Intranet.

We commit to protecting health, safety and the environment as an integral aspect of the design of our products, processes and services, and of the life-cycle management of our products.