

# Code of conduct



**a.hak**

**GETTING THE JOB DONE**

# Code of conduct





## **Message from the Chief executive**

A. Hak is currently in a rebuilding phase with a strategic focus on core competencies. As part of this change programme, we are communicating clear guidelines on what is expected of each and every staff member and counterparty.

Reputation can make or break any business. We have committed ourselves to conduct business with integrity and respect. As the Executive Board, you can look up to the example we set. We ask no less from each staff member than what we are prepared to be judged against.

All staff members are urged to read our Code of Conduct carefully and uphold it in everything you do on a daily basis.

Let us go out there and win business with integrity in rendering a superior service, and building a reputation based on quality and reliability.

**Remco Smit**  
**CHIEF EXECUTIVE**

**This booklet contains  
a summary of the  
A.Hak Code of Conduct.**

For further details, please  
refer to the Code of  
Conduct Policy in the  
Information Library in the  
A.Hak SharePoint Portal.

Version 01

Effective 1 December 2018

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A 3D maze with yellow walls and a white floor. A small black silhouette of a person is standing at the entrance of the maze on the left side. The maze is complex and winding, filling most of the page.

# Intro- duction

**Our Code of Conduct represents our core values in how we conduct our business. It is there to show each staff member, in comprehensible language, the do's and don'ts of what is expected from them. If this is adopted and complied with by all, it will generate the trust and respect needed to further strengthen the A.Hak brand. In following the Code and our core values, you protect A.Hak and yourself.**

## Using the code as a moral compass

You may be confronted with situations without an obvious right or wrong answer. If this is not abundantly clear – stop, ask! Always imagine that whatever you are about to do, will be on the front page of tomorrow’s newspaper.

In using the Code as a moral compass to help navigate through difficult decisions, first establish the facts, and then ask yourself:



- What does the law say?
- Does it make you uncomfortable? Can you share this with your manager or your partner?
- Is the action in line with the A.Hak Code of Conduct?



Are you not sure how to answer these questions? Ask for help from your manager or the A.Hak Compliance Manager.

## Our core values

Our core values underline the principles that guide our conduct both internally, with one another, and externally, with the outside world.

### CAREFULLY

We believe in:

- Providing a safe work environment for our people.
- Speaking up if we believe something might be wrong.

### CONSIDERATELY

We believe in:

- Empowering ourselves and others.
- Respecting the human rights of others.
- Protecting the environment.

### WITH INTEGRITY

We believe in:

- Conducting honest business.
- Taking accountability for our actions.
- Being transparent.
- Open and honest communication.

**“Working together carefully, considerately and with integrity.”**

# Living our core values

To cement our core values in our day to day business, the Executive Board makes 5 promises to you. You can keep us to it. In return, we want you to make 5 promises to us to which we will keep you.

## We expect from our managers

- To take ownership and make courageous decisions
- Active safety en integrity leadership
- A winners mentality driving change
- Commercial savvy
- To be methodical and structured
- A high level of emotional intelligence
- To team up to be great
- To demonstrate a passion for Hak

## We expect our employees to be

- Responsible- Take accountability
- The best- the best that you can be
- Interested-continuous development
- Valuable-Solve problems above your paygrade
- Open and honest
- Demonstrating a passion for Hak

## The 5 pledges management makes to you

1. We will uphold this code without fear or favour.
2. We will provide you with a safe work environment and will not tolerate any discrimination.
3. We will listen to you in confidence and with an open mind.
4. We will respect the environment in which we operate and the human rights of the people and communities we serve.
5. We will conduct our business honestly.

## The 5 pledges by staff members to A.Hak

1. I will devote my time and energy to build the A.Hak brand.
2. I will always act in the best interest of the company and with integrity.
3. If I see anything that may cause harm to the company, I will address or report it.
4. I will respect the Code and my colleagues.
5. I will work safely and will address anyone not complying with safety standards.

# Who does the code apply to?

**The Code applies to all A.Hak staff members and contractors wherever they are located. Anybody working for any A.Hak subsidiary is required to comply with the Code.**

## **WE ALL NEED TO FOLLOW THIS CODE**

If you do not follow the Code, this may result in disciplinary action and in some instances, even dismissal.

All new staff members must receive the Code upon being hired and sign that they will comply with its contents.

Note: Contractors should also acknowledge the Code as part of their agreement.

## **What about joint venture partners?**

If A.Hak is the controlling partner in the JV – the Code must apply. If we are not the controlling partner, we should make our best efforts to ensure adoption of similar standards and include as a minimum:

- Communicating our code to the JV partner(s)
- Requesting that an equivalent code be implemented in the JV.

## **What about our business partners?**

As far as possible, all our business partners such as international or local suppliers, agents, advisors or consultants must be urged to act consistently with our Code.

You can implement this by adding a clause to their contracts indicating that they will act in accordance with our Code of Conduct, while including a copy of it to the contract.

## **PERSONAL RESPONSIBILITY**

As a staff member you have a personal responsibility to ensure that you follow the Code and to ensure that others do so as well.

## **RESPONSIBILITY OF THE MANAGER**

Ensure that:

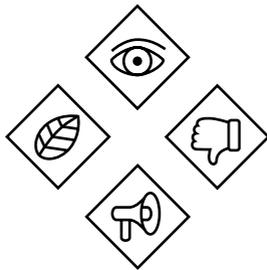
- You follow the Code and lead by example.
- People reporting to you are properly briefed.
- You act in the best interest of the company when a concern is raised.
- Breaches of the Code are reported and investigated.
- Never encourage employees to achieve business results at the expense of doing something that would violate the Code.

# Speaking up

When you see something that is wrong – speak up. It is the right thing to do. We will ensure that you are not victimised.

## WHAT SHOULD YOU REPORT?

- Any actual or suspected fraud, bribery or misconduct.
- Misconduct is any breach of the Code of Conduct.
- A mere suspicion – as long as it is made in good faith – should be reported.
- Any form of victimisation, bullying or harassment.
- Disregard for the environment, health, safety or security.



## WHAT IS THE PREFERRED PROCESS OF REPORTING

Do you see behaviour that is not acceptable?

Try to raise this internally first. The desired sequence is:



- Speak to each other about unacceptable behaviour.
- If this does not work or if it makes you feel unsafe, then report it to your direct line manager.



- If this does not work or if it makes you feel uncomfortable, then you can speak with our Compliance Manager.  
André Bouwer  
abouwer@a-hak.nl  
+31 6 42548328



- If in your view, you cannot follow the above procedures, or if you would prefer to make a report anonymously – you can contact the whistleblower helpline directly.
- If you feel that we have not acted on your report, you can contact the House for Whistleblowers (in the Netherlands) for advice.

### CONTACTING THE GLOBAL WHISTLEBLOWERS LINE

If you are not comfortable with raising your concern internally, you can contact the A.Hak Global Whistleblowers line (called 'Whistleblowers Line'). This is a confidential line managed by an independent company with no association to A.Hak. You can make your report anonymously or provide your details.

The hotline is open 24 hours a day, seven days a week through a local telephone number in each country or through the internet. Individuals calling the hotline will talk in confidence to an experienced, independent operator.

### 3 WAYS TO CONTACT SEEHEARSPEAKUP

#### TOLL FREE PHONE NUMBERS

The hotline can be contacted via the local free phone numbers below. Telephone calls are not recorded.

Country	Number
Netherlands	0800 022 2398
Germany	0800 723 5206
Poland	00 800 121 1495
Saudi Arabia	8008 500 402
Chili	12300 205 765
United Kingdom	0800 056 2539

#### WEBSITE

You can log your concern via the internet on the website of the hotline: [www.seehearspeakup.co.uk/en/file-a-report](http://www.seehearspeakup.co.uk/en/file-a-report)

You will require the username and password detailed hereunder:

**Username: AHak**

**Password: AHak32**

#### E-MAIL

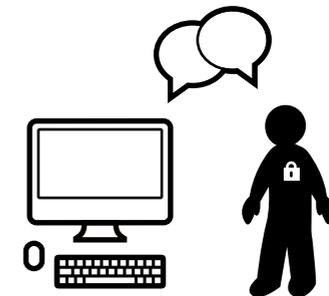
You can log your concern via e-mail by using the following address: [report@seehearspeakup.co.uk](mailto:report@seehearspeakup.co.uk)

#### WHERE TO GO FOR HELP?

**Relevant Policies** A.Hak Whistleblowers Policy in the Information library on SharePoint.

Or

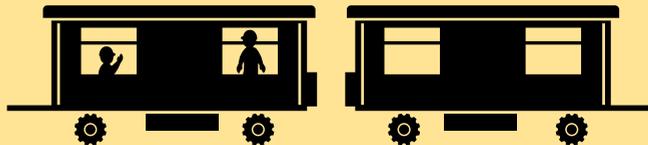
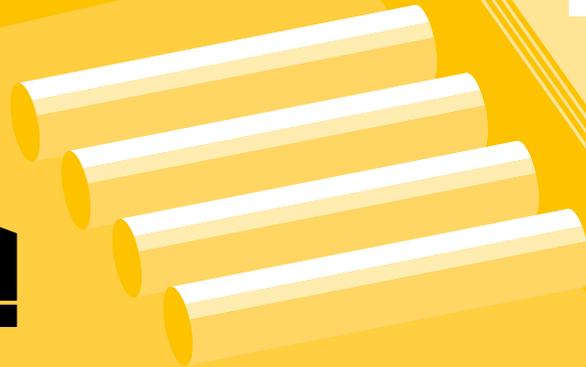
**Contact** Your direct line manager, the Compliance Manager, the HR Manager or the Whistleblowers Line.





# Our people

We are committed to providing our people with an open and safe work environment, where everyone is treated fairly and with respect.



# Health & safety

**We are committed to doing no harm to people.**

## **AS A BUSINESS, WE COMMIT TO**

- Provide a safe work environment for our staff.
- Comply with applicable laws and regulations.
- Adequately train our staff on occupational health and safety matters.

## **WE EXPECT FROM EVERY STAFF MEMBER**

- To understand and follow our QHSE Policy.
- If you note concerns, correct it or immediately report it to your direct line manager or the QHSE Manager.
- To support our goal of zero preventable accidents.

## **WE EXPECT FROM EVERY BUSINESS UNIT / SUBSIDIARY TO**

- Implement, maintain and comply with the A.Hak QHSE Management System and contribute to continuous improvement.
- Implement and continuously comply with all relevant QHSE legislation of the country in which you operate.
- Set follow-up targets for QHSE improvement and measure, appraise and report performance levels.
- Apply your best efforts to try and ensure that our contractors and joint venture partners apply similar standards.

## **WHERE TO GO FOR HELP?**

**Relevant Policies** A.Hak QHSE Policy in the Information Library on SharePoint or the 10 golden rules in the QHSE CSR instruction.

Or

**Contact** Your direct line manager, the QHSE Manager or the Whistleblowers Line.

## **Remember**



**Work safe or do not work at all.**



**Address one another on unsafe conduct.**



**Use your common sense.**



**Do the job once, properly.**

From the QHSE CSR golden rules

**Identify where we  
can continuously  
improve on safety  
– do MORE!**

# Conduct in the work place

**We are committed to creating and maintaining a work environment free of discrimination, where everyone is treated fairly. We do not tolerate any form of discrimination, harassment or bullying.**

## WHERE TO GO FOR HELP?

**Relevant Policies** A.Hak Whistleblowers Policy and the A.Hak Staff Guide.

Or

**Contact** Your direct line manager, the HR Manager or the Whistleblowers Line.

## WE RESPECT ONE ANOTHER

- We will be open and transparent and treat all our staff members with respect.
- We will listen to you.

## YOUR RESPONSIBILITY

- Ensure that you act in a manner that is fair and transparent in everything you do.
- Show respect in how you address and speak to people, even if this respect is not returned.
- Never distribute or display offensive or derogatory material, including pictures.

## BE SOBER

- The unauthorised use of drugs, alcohol and medication that may influence your consciousness or behaviour on Company premises, while conducting Company business, operating Company equipment or driving Company vehicles is strictly prohibited.

**Remember** Always consider your own behaviour and think how this can either affect others positively or negatively.

## DO NOT HARASS OR BULLY PEOPLE

- We do not tolerate any form of behaviour which is humiliating, intimidating or hostile.
- Any form of sexual harassment or similar types of conduct which offends or makes a colleague uncomfortable will not be tolerated and does not belong in the workplace.

## YOUR RESPONSIBILITY

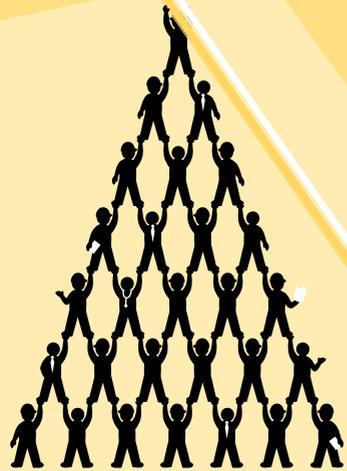
- Do not bully, intimidate, be offensive or malicious.
- Never make inappropriate jokes or comments. If you are unsure whether something is inappropriate, assume that it is.
- Refrain from spreading rumours or gossip that may offend.
- Do not engage in sexual harassment including unwelcome physical contact, expressions, gestures, comments or invitations.
- Do unto others as you would like them to do unto you.

## DO NOT DISCRIMINATE

- We will maintain an inclusive work environment free of any form of discrimination.
- Our decisions relating to recruitment or promotion are based on effort, ability and results alone. Our decisions will not be influenced on factors such as age, gender, sexual orientation, marital status, ethnic origin, religion or belief, disability or political views.
- We will respect the local legislation, customs and culture whenever we operate in foreign countries.

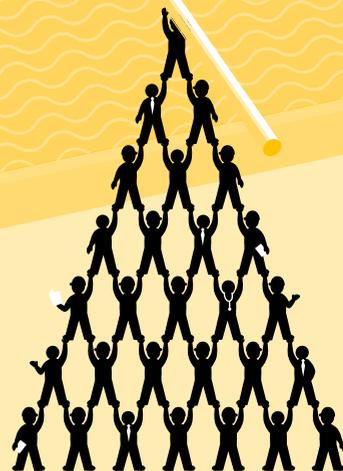
## YOUR RESPONSIBILITY

- Be sensitive to cultural differences and actions which may be acceptable in one culture but are not in another.
- Refrain from conduct that may amount to discrimination.
- Report any form of discrimination to your direct line manager, the HR Manager or the Whistleblowers Line.



# Personal and business integrity

Integrity is the one of the most important core values for a company to demonstrate, because the success of a company is inextricably linked to trust. Trust in each other, in management but also the trust we earn from our customers by conducting honest business in building quality infrastructure. Trust is earned by how we interact with one another and our clients on a daily basis.



# Conflict of the interest

## HONESTY

We conduct our business honestly and transparently and do not improperly influence anyone.

### This includes

- Avoiding conflicts between our personal interests and those of A.Hak.
- Competing fairly.
- Not bribing people or accepting bribes.
- Keeping proper records of business transactions.

Avoid any conflict between your interests and those of the Company which could influence or appear to influence your ability to make objective decisions.

## YOUR RESPONSIBILITY

- Avoid any actual or potential conflicts. If in doubt, ask your direct line manager or the Compliance Manager.
- Declare all relevant facts to your direct line manager or supervisor on any matter that could influence or be perceived to influence your decisions or actions.
- All staff members are required to complete an Annual Conflict of Interest form online in the Compliance section of SharePoint.

### How must I declare a conflict?

- The principle: You can acquire interests in other businesses and perform external paid work in your own time and with your own resources, provided that this does not result in any actual or potential conflict of interest. In order to do so, you must obtain prior written permission from your direct line manager.
- You must register all conflicts as soon as they arise in the A.Hak Conflict of Interest Register, located in the Compliance section of SharePoint.
- The direct line manager has to apply his/her mind to the request and if approving the request, can do so with certain conditions.

## Family and friends

*You may not:*

- Appoint, or refer work, to a supplier which is owned or controlled by you or a member of your family, unless you have received prior written permission from your direct line manager.
- Hire a family member, close personal friend or someone you are in a close personal relationship with.
- Manage a family member or someone you are in a relationship with.

## Outside directorships or ownership

*You must not:*

- own or have a material interest in or be a director at any customer, supplier or competitor of A.Hak without this being disclosed and approved in advance in writing by your direct line manager.
- outside directorships or ownerships are allowed if they do not constitute a conflict of interest and if it is disclosed to and approved in advance in writing by your direct line manager.

## Examples of instances where a conflict of interest can arise include

- Conducting paid work for competitors, suppliers or other business partners of A.Hak.
- Working for or running a business delivering services also delivered by A.Hak.
- Maintaining a close personal relationship with a public official in a position of authority or influence in connection to A.Hak affairs.
- Supervising a family member or someone with whom you have a close personal relationship, in which you are in a position of influence about their employment or terms of employment.

## WHERE TO GO FOR HELP?

**Relevant Policies** A.Hak Whistleblowers Policy and Anti-Bribery Policy in the Information Library on SharePoint.

Or

**Contact** Your direct line manager, the Compliance Manager or the Whistleblowers Line.

## We compete fairly

**Antitrust laws protect free enterprise and prohibit behaviour that limits trade or restricts fair competition. These laws combat illegal practices like price-fixing, market-sharing, bid-rigging conspiracies or behaviour that aim to achieve or maintain a monopoly.**

### OUR COMMITMENT

- We will only seek competitive advantages through fair and lawful means.
- We will comply with antitrust laws.

### YOUR RESPONSIBILITY

- Do not agree, even informally, with competitors:
  - To allocate customers, territories or markets
  - Not to supply certain customers
  - Not to compete
- Do not rig bids or tenders, and do not agree with competitors to bid in a specific way against a reward or a specific subdivision of the work once awarded.
- Any agreements with competitors in relation to specific market conduct or prices must first be cleared with the Compliance Manager or the Business Unit leader or the Executive Board.

### WHERE TO GO FOR HELP?

**Relevant Policies** A.Hak Whistleblowers Policy and Antitrust Policy in the Information Library on SharePoint.

Or

**Contact** Your direct line manager, the Compliance Manager or the Whistleblowers Line.

## Anti-bribery and corruption

**We do not bribe people or accept bribes.**

Bribery poses a substantial risk to our business as increased regulatory enforcement, substantial fines, reputational damage of our brand and the prosecution of individuals are becoming the norm.

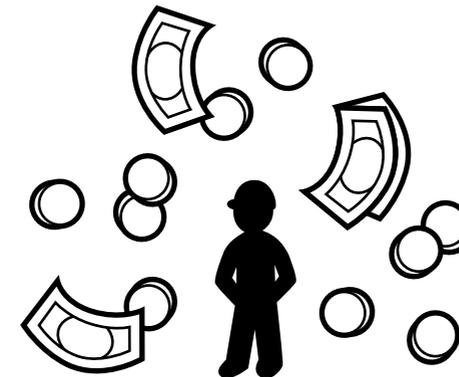
We operate in a high risk industry and often in countries with large bribery risks. Bribes are against the law, no matter what 'local custom' says.

### WE DO NOT

- Tolerate any bribery or facilitation payments.
- Appoint agents unless we have ensured that they do not pay bribes on our behalf.
- Present gifts and hospitality (G&H) or sponsorships and donations unless it is compliant with the Code of Conduct.

### WE WILL

- Comply with corruption legislation applicable to every country in which we operate.



**YOUR RESPONSIBILITY**

- You must not offer, pay, make, seek or accept a personal payment, gift or favour in return of any business advantage.
- You must comply with corruption legislation applicable to both the country in which you operate and that of the Netherlands. If you are not certain, reach out to the Compliance Manager.
- Do not make facilitation payments. If a facilitation payment has been requested or extorted, you must immediately report this to your direct line manager and the A.Hak Compliance Manager.
- Call the Whistleblowers Line if you suspect or know that A.Hak is paying bribes or that any staff member of the company has received or is paying a bribe.
- Only provide for gifts, corporate hospitality, donations and sponsorships in accordance with this Code.
- You need written permission from the Business Unit Leader, the Executive Board or the Compliance Manager to offer Gifts & Hospitality to government officials or their families or associates.

**You must report the following in online registers in the Compliance Portal on SharePoint and obtain your direct line manager's approval**

- All G&H that could be perceived as creating a conflict of interest, accepted or declined;
- All G&H from any third party valued at €150 or greater, accepted or declined;
- All G&H to a private/commercial individual valued at €150 or greater, accepted or declined; and
- All G&H to a Government Official valued at €20 or greater, accepted or declined.
- All funding of Social Investments, Donations and Sponsorships must be recorded in the Donations and Sponsorship e-register.

**BEWARE AGENTS- RED FLAG**

Agents pose the greatest corruption risk to a company as the company is liable for what the agent does on its behalf. Always establish what the agent will do on our behalf and whether the fee charged is market related. Commission fees on contract value should not be agreed unless we have ensured that the agent does not pay a bribe on behalf of the company. All agent contracts must be reviewed by the Compliance Manager prior to signing.

**FACILITATION PAYMENTS**

Facilitation payments are typically small, unofficial payments made to secure or expedite a routine government action by a government official and are sometimes referred to as 'speed' or 'grease' payments. Requests for such payments are common in some countries in which we operate.

These payments are against the law and should not be made. However, employees are NOT expected to put their lives, liberty or property at risk. Any such payments made under any form of duress must be reported to the Compliance Manager or Business Unit leader.

**WHERE TO GO FOR HELP?**

**Relevant Policies** A.Hak Whistleblowers Policy and Anti-Corruption Framework in the Information Library on SharePoint.

Or

**Contact** Your direct line manager, the Compliance Manager or the Whistleblowers Line.

**“Integrity is about doing the right thing – even when no one is watching.”**

CS LEWIS

# In line with the law

**We will comply with local country legislation in relation to imports, exports and sanctions.**

Export/Import Controls and sanctions give countries legal control over the sale and purchase, shipment, electronic transfer or disclosure of information, software, goods and services across national borders.

The laws and regulations governing these restrictions are complex and subject to change. Think carefully about the potential impact of import/export controls and sanctions before transferring goods, technology, software or services across national borders.

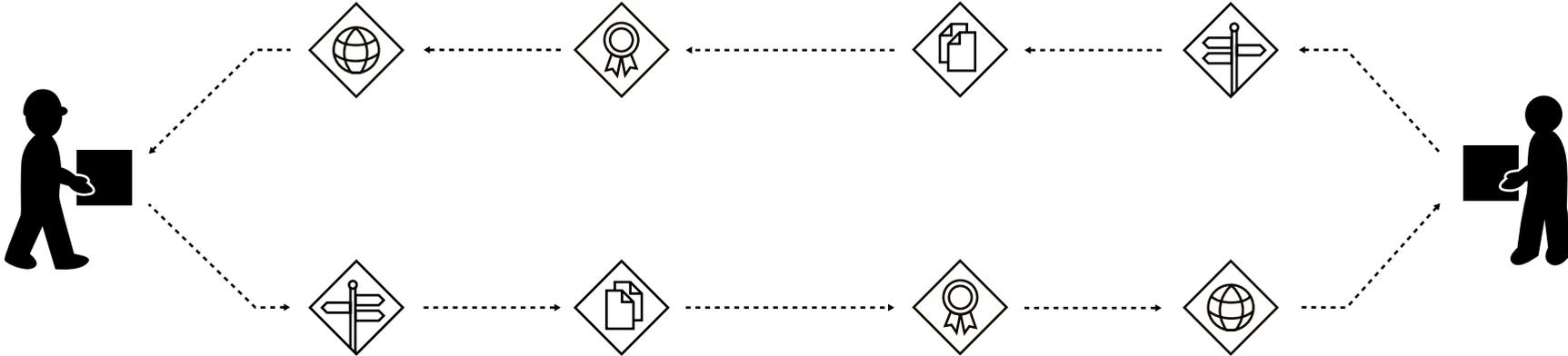
Remember that controls and sanctions (or embargoes) can be imposed against countries, entities, individuals and goods.

**YOUR RESPONSIBILITY**

- Make sure you have proper authorisation before exporting or importing goods, technology, software or services across national borders.
- Know your customers and suppliers and ensure that proper due diligence is conducted by the Compliance Manager BEFORE you enter into agreements with counterparties.
- Seek legal advice before doing business with a country or individual if sanctions apply.
- Do not import or export from a country to which sanctions apply, into a country applying those sanctions.
- Keep up-to-date with changing rules.
- Get legal advice OR contact the legal or Compliance Manager if you have doubts about export and import controls or sanctions.

**WHERE TO GET HELP?**

Contact the Compliance or Legal Manager. Refer to the KYC Policy. Remember to check for sanctioned entities before you import or export!



# Know your counterparty

**We will mitigate our risk by performing a due diligence on our counterparties.**

Money laundering is a term used to describe methods of concealing or disguising the origin and proceeds of illegal transactions. This is the very reason why it is of the utmost importance that we know our counterparties and that we do not trade with a sanctioned entity or an entity linked to terrorism.

## NEED HELP?

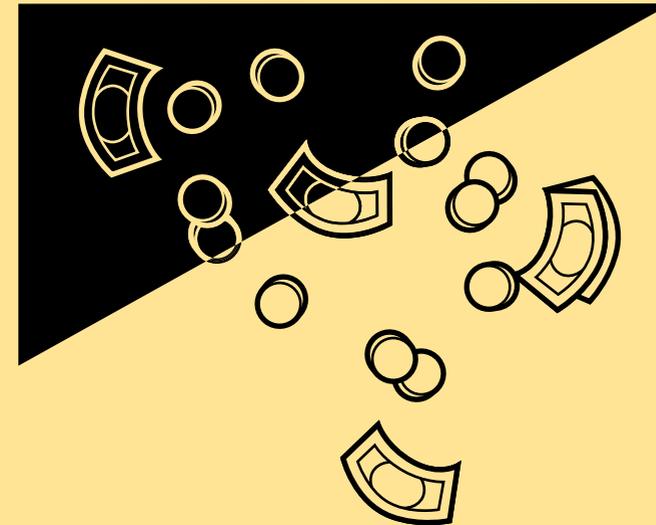
Call the Whistleblowers Line or contact the Compliance Manager if you know of any potential money laundering practices, or if you are uncertain whether practices are legal or not. You may also send an e-mail to [kyc@a-hak.nl](mailto:kyc@a-hak.nl). For further information, please see the KYC Policy in the Information Library on SharePoint.

## YOUR RESPONSIBILITY

- To ensure that A.Hak is not exploited by criminals to launder money or fund criminal activities, you have to conduct appropriate counterparty due diligence (via the Compliance Manager).
- Perform the due diligence BEFORE you contract.
- The Compliance Manager will assist you in understanding the business & background of our prospective business partners and in determining the origin and destination of money and property.
- You must report suspicious incidents or transactions of money laundering to your manager or the Whistleblowers Line.

## How to identify money laundering?

- Is someone offering commercial terms outside expected market conditions?
- Are the settlement methods unusual or are unconnected parties involved?
- Are there any unexpected changes of bank account details? These can only be effected with direct telephonic confirmation with the account holder.
- Requests for reimbursement claiming that an erroneous payment was made into the A.Hak account.



# Safe-guarding our assets

We are committed to adequately protecting our financial and non-financial assets and data and expect each of our staff members to treat them as if they were their own.



# Accurate business records

**We are committed to high standards of accuracy and integrity in our business records.**

Ensuring accurate and complete business and financial records is everyone's responsibility – not just a role of the financial department. Accurate record keeping and reporting enables us to comply with our regulatory duties and to meet our responsibility to our stakeholders.

## YOUR RESPONSIBILITY

- Ensure that the books, records and accounts that you deal with accurately and transparently reflect all transactions in sufficient detail.
- Always seek the appropriate level of authorisation for financial and commercial transactions in accordance with the Charter of Authority (approval matrix).
- Always record and classify transactions and financial records in the proper accounting period and in the appropriate function or reporting unit.
- Do not delay or accelerate the recording of revenue or expenses to meet budgetary or bonus goals.
- Never distort the true nature of any transaction or falsify a document.
- Try to achieve value for money when you spend Company money.

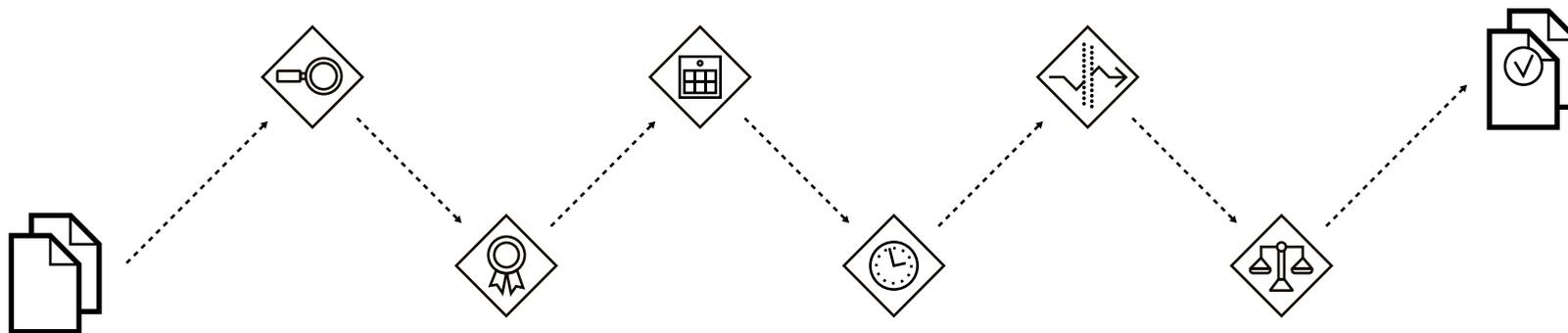
## AS MANAGEMENT, WE WILL

- Investigate any instances or suspicions of fraud or conflict of interest.
- The Compliance Manager, in conjunction with Finance, must design and execute effective controls to ensure that all financial transactions are properly authorised, recorded and reported.

**Our business records include** not only our financial accounts, but other records such as quality reports, expenditures, hours worked, expense claims and any other aspects of the Company's business records.

## WHERE TO GET HELP?

Report any incidents or suspicion of fraud or material breakdowns in financial control to management or the compliance manager or the Global Whistleblowers line.



# Company assets

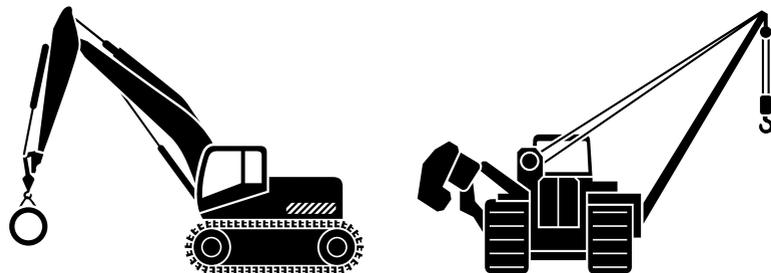
**We believe in protecting our company assets and using it only for valid business purposes.**

## COMPANY ASSETS ARE:

- Company money
- Inventory / supplies
- Computer systems and software
- Company issued telephones
- Company data
- Trademarks
- Know-how and intellectual property

## YOUR RESPONSIBILITY

- Only use our assets for valid business purposes.
- Protect our assets against waste, loss, damage, misuse, theft, misappropriation or infringement.
- Use our assets appropriately and responsibly.
- Respect the physical and intangible assets of others.
- Do not seek personal gain from the use, sale, transfer or other disposal of our assets or non-public information.
- Protect non-public company information.



## CASH TRANSACTIONS

Avoid cash transactions whenever possible.

If unavoidable, cash transactions or petty cash facilities must be approved by the appropriate management level, and all transactions must be properly accounted for and supported by adequate documentation.

## RECORDS MANAGEMENT

Safely maintain and keep all records as long as legally required in line with the A.Hak Data Classification Policy and the Data Retention Policy in the Information Library on SharePoint.

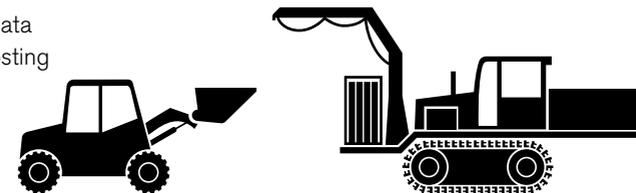
## WHERE TO GET HELP?

Report any incidents or suspicion of theft, fraud or abuse of company assets to your direct line manager, the Compliance Manager or the Global Whistleblowers line.

## WHAT IS NON-PUBLIC INFORMATION?

This is any information that a company has not disclosed or made generally available to the public. Examples include information related to:

- Employees
- Contracts
- Strategic and business plans
- New product launches
- Mergers and acquisitions
- Technical specifications
- Pricing
- Financial data
- Product costing
- Invention



# Personal information

**We respect and protect the personal information of our staff and counterparties.**

The General Data Protection Regulation (GDPR) has an enormous impact in how we deal with personal information in our business. It is everyone's duty to ensure that we only gather what we need, keep it only as long as legally required and seriously consider how we distribute personal information.

## YOUR RESPONSIBILITY

- Only collect and retain personal information for legitimate business purposes.
- Store all personal data obtained during the course of your employment within the A.Hak systems, which can be either a dedicated fileserver or an A.Hak SharePoint environment.
- Only disclose identifiable personal information to third parties if this is required to fulfil legal obligations or with appropriate consent of the individual to whom it relates.
- Ensure in such instances that we enter into a data processing agreement. The Compliance Manager will assist you.
- Take care to prevent unauthorised access in processing of personal data or accidental loss or destruction of personal data.
- Only retain personal information for as long as is relevant to business requirements or required by law.
- Call the A.Hak ICT Manager IMMEDIATELY if you know of, or suspect, any security lapses or breaches. We are legally required to report any such event within 72 hours.

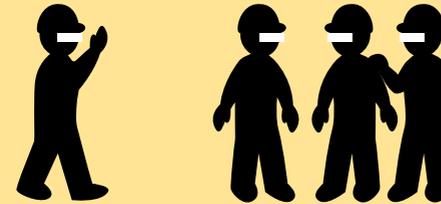
## WHERE TO GET HELP?

**Policies and guidance** Data Privacy Policy.

**Contacts** Your direct line manager, a member of the HR team, the Compliance Manager, or send an email to [gdpr@a-hak.nl](mailto:gdpr@a-hak.nl).

## What is personal information?

- Identity and contact details
- Employment and financial information
- Age and nationality
- Ethnic origin
- Religion or philosophical beliefs
- Health information
- Sexual orientation
- Trade union membership



# Personal use of facilities

**We provide you with communication facilities for business purposes.**

Limited personal usage of the A.Hak IT and communication facilities is currently generally acceptable. Please note that your usage of these facilities, including your personal use, is logged and can be monitored in certain circumstances.

## WHERE TO GO FOR HELP?

**Relevant Policies** A.Hak Whistleblowers Policy, Privacy Policy and the A.Hak Staff Guide.

Or

**Contact** Your direct line manager, the HR manager or the Whistleblowers Line.

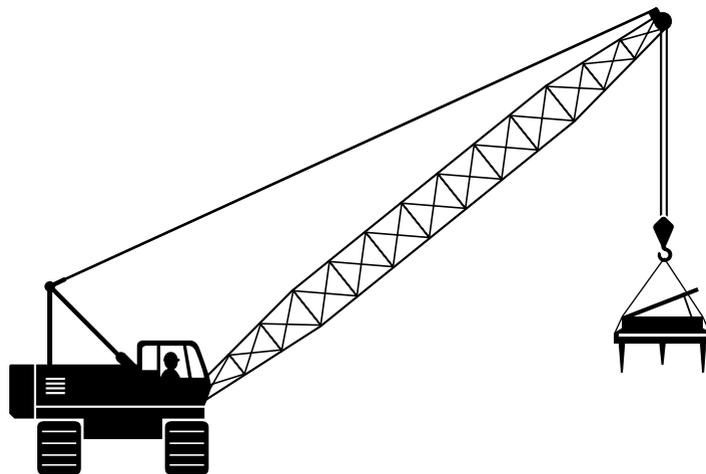
## YOUR RESPONSIBILITY

- Ensure your personal use of A.Hak IT and communication facilities is occasional and brief.
- Personal use includes online personal banking, social media for non-work related communications, browsing of sites of personal interest and downloading information of personal interest.
- Downloading or streaming of non-work related video content is strictly prohibited.
- Do not use the A.Hak network or data storage space on the network for entertainment purposes or to store your personal data.
- Remain in control of the IT and communication facilities you are responsible for.
- Do not use A.Hak IT or communication facilities for unlawful or immoral activities or purposes (including the violation of IP rights or the commission of cybercrime), online gambling or to conduct your own business activities.
- Never share your personal passwords.
- Do not upload, download, send or view pornography or other indecent or objectionable material, or any material that is illegal or which could cause offence, anxiety, inconvenience or annoyance to your colleagues.

## THE RIGHT TO MONITOR

If a staff member is suspected of committing misconduct, theft, fraud, corruption, money laundering or breaching the A.Hak Code of Conduct, his or her usage of A.Hak IT and communication facilities may be monitored / reviewed to establish the correctness of the allegation.

Such monitoring will be incidental and based on a reasonable suspicion. The staff member concerned will be informed after the monitoring by the Compliance Manager.





# Our external relations

We conduct our business with respect for the environment and human rights.

# Human rights

**We conduct our business respecting human rights and the environment.**

Our respect for human rights is reflected in our adherence to corporate policies, compliance with applicable laws and regulations, regular dialogue and engagement with our stakeholders and contributing, directly or indirectly, to the general wellbeing of the communities in which we work.

## **HUMAN RIGHTS- WE ARE COMMITTED TO**

- Combatting any form of modern slavery, trafficking, child labour or exploitation or forced labour occurring within our organisation or that of any of our business partners.
- Subscribe to and comply with country-specific legislation on minimum wages and freedom of association which includes the right to belong to and take part in trade union activities.
- Seek business partners and suppliers that observe standards similar to ours.

## **YOUR RESPONSIBILITY**

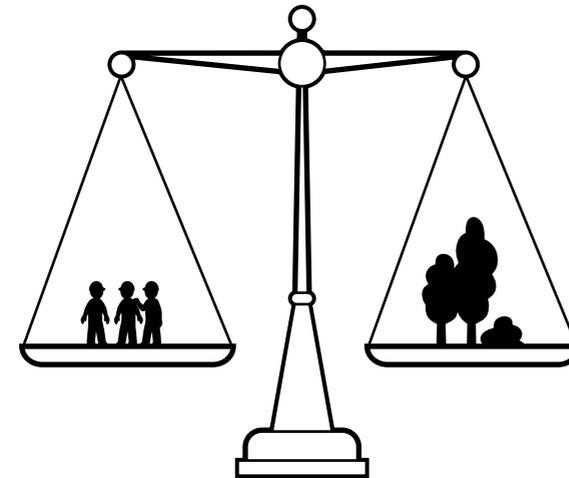
- You should report any potential or suspected breach of human rights to your direct line manager, the HR Manager or to the Whistleblowers Line.
- You should maintain a basic understanding of the in-country specific requirements on human rights aspects that we subscribe to and follow them.

## **OUR ENVIRONMENT - WE ARE COMMITTED TO**

- Assessing the environmental impact of our operations, the use of resources, the production of waste and pollution, and setting priorities for their reduction.
- Complying with all applicable environmental laws and regulations wherever we operate.

## **YOUR RESPONSIBILITY**

- You should understand the environmental requirements of your role and location and seek support from the QHSE team if you need to.
- Report any concerns or incidents, including near misses, to your manager or a member of the QHSE team.
- Do your utmost to ensure that our business partners and counterparties observe the same standards.



## Working with our partners & suppliers

**We believe in being fair and transparent with our business partners and treating them with respect.**

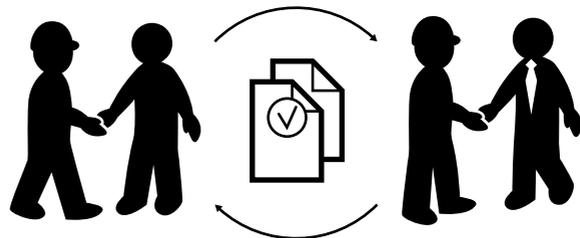
Our business partners play an important part in the sustainability and success of our business. It is of the utmost importance that they subscribe to our values in rendering a world class service with integrity.

### WHAT WE COMMIT TO

- Conducting our relationships with suppliers and business partners with fairness, integrity and respect.
- Ensuring that our business partners maintain the same standards of integrity and world class performance that we subscribe to.
- Always ensuring that the contracted service represents value for money.

### YOUR RESPONSIBILITY

- Always ensure that the relationship is concluded on A.Hak's standard terms and conditions or in terms of a contract which adequately protects the company.
- Ensure that you follow a competitive procurement process which is fair, equitable, and transparent.



## How we communicate

**The manner in which you communicate reflects directly on the company, its reputation, and how we are perceived by the outside world.**

Business communications includes any kind of correspondence such as mail, electronic documents, instant messages, websites, social media tools, paper documents, facsimile, voice and voice mail recordings.

### REMEMBER

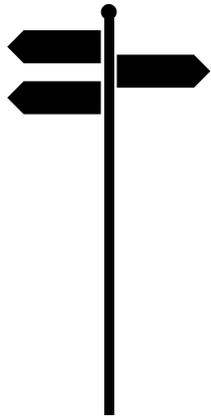
- Staff members / contractors must not engage with media on behalf of A.Hak, but instead should redirect media enquiries to the A.Hak Communications Manager for response.
- All press releases should be prepared by the Communications Manager.
- Do not engage with the media or the investor community unless the required clearances have been obtained.

### The principles based on which you should communicate

- In your business communications:
  - do not mislead;
  - do not be ambiguous
  - do not write speculative opinions;
  - do not exaggerate;
  - do not engage in 'casual conversation' on sensitive or confidential matters; and
  - do not joke about serious matters.
- State which A.Hak company the communication is coming from.
- Remember that communications with a competitor may violate antitrust laws.
- When dealing with personal information ensure that you comply with the A.Hak Privacy Policy.
- Consult with the Communications department before publicly disclosing information.

#### YOUR RESPONSIBILITY

- Staff members / contractors must not engage in casual conversation on sensitive or confidential matters, or send communications containing material that is racist, sexist, offensive, defamatory, fraudulent or otherwise inappropriate.
- Staff members / contractors must not disclose confidential business information (e.g. financial, operational, legal information, or any information that pertains to clients and customers) unless authorised to do so.
- Staff members / contractors must not use personal social media accounts for business purposes. Personal social media may be used to comment on industry-related topics, however, staff members / contractors must clearly mark their own online posts as *'personal views that are purely their own, and not necessarily the views of A.Hak.'*





**This booklet contains  
a summary of the  
A.Hak Code of Conduct.**

For further details, please  
refer to the Code of  
Conduct Policy in the  
Information Library in the  
A.Hak SharePoint Portal.

Version 01  
Effective 1 December 2018