



GROUP

Code of Conduct

Foreword



At KIVO, we work with a high degree of freedom and responsibility. This is one of the strengths of our organisation. At the same time, I firmly believe that our success depends not only on this freedom and responsibility, but above all on how we treat one another and how we conduct business.

This Code of Conduct provides guidance for our day-to-day actions. It is not intended as a theoretical document, but as a practical compass that helps us make choices that reflect who we are: open, down-to-earth and together.

Acting with integrity goes beyond protecting our reputation or preventing risks. It is also about creating a working environment in which we support, respect and hold one another accountable, and in which our shared values are reflected in what we do.

Together, we are building an organisation in which people take responsibility and speak up when something is not right. I expect everyone to know and apply this Code of Conduct. This is how we keep KIVO strong, reliable and future-ready.

Robert Kwakman
Managing Director

1. What is this Code of Conduct for?	4
2. Who does this Code of Conduct apply to?	5
3. OUR KIVO: our core values in practice	6
4. How we treat one another	7
5. Working safely is non-negotiable	8
6. Doing business fairly: integrity and ethics	9
7. Information, confidentiality and company assets	10
8. Responsibility throughout the value chain (suppliers and partners)	11
9. Product safety, quality and fair market practices	12
10. Identifying and discussing risks	13
11. Reporting concerns, speaking up and learning	14
12. Closing statement: this is ours	15



1. What is this Code of Conduct for?

This Code of Conduct describes how we work together at KIVO and how we conduct business. It is not a marketing story, nor is it a comprehensive manual containing every procedure. It is a guide to how we behave: **this is how we work at KIVO, and how we do not.**

We use this Code to discuss behaviour openly, assess our decisions and hold one another accountable: **does this fit with OUR KIVO?**

2. Who does this Code of Conduct apply to?

This Code applies to everyone working under the KIVO name: the Board of Directors, management, employees (permanent, temporary and agency workers, as well as interns) and anyone else performing work under KIVO's authority.

In addition, this document serves as a **framework of standards** for our business partners. When working with suppliers and

service providers, we expect them to operate according to comparable standards.

Specific requirements and assessments are governed by our Supplier Code of Conduct and, where applicable, by the Codes of Conduct maintained by our partners and suppliers themselves, provided that these contain comparable standards.





3. OUR KIVO: our core values in practice

Our core values are summarised in **OUR KIVO: Open, Down-to-earth and Together**. These are not slogans, but practical principles that guide our day-to-day collaboration.

Open

At KIVO, we communicate openly and are transparent about our intentions. We listen, ask questions and explain our reasoning. We talk with one another, not about one another. If something is wrong or does not feel right, we say so in good time, directly and without unnecessary fuss.

Being open also means being clear about decisions and expectations. We make agreements that can be explained and justified, and we leave no room for hidden agendas.

Down-to-earth

We value the down-to-earth mentality

associated with Volendam: being realistic, hardworking and honest about what is and is not achievable. We assume that others have good intentions and avoid suspicion and internal politics.

Being down-to-earth also means solving problems rather than passing them on. We do not make issues bigger than they need to be, but neither do we sweep problems under the carpet.

Together

At KIVO, we work together like a relay team: we make sure the baton is passed on properly. We do not simply throw problems over the fence. We help one another and take responsibility for our shared results. Free-riding is not how we work.

Together also means taking one another into account, including differences in pace, workload and safety.

4. How we treat one another

Respect and equality

Every employee is treated with dignity and respect. We do not accept discrimination, harassment, inappropriate behaviour or oppression. Regardless of who you are, where you come from or what position you hold, at KIVO we treat one another with respect.

At KIVO, we believe it is important that everyone feels safe to raise concerns or report inappropriate, unfair or discriminatory behaviour. We provide transparent, confidential and fair ways to do so.

Anyone who raises a concern in good faith should not fear negative consequences. We do not tolerate retaliation, unfair treatment or pressure against anyone who speaks up. Holding one another accountable and discussing misconduct openly are part of working together openly and respectfully at KIVO.



Workload, health and sustainable employability

KIVO wants people to remain healthy and able to perform their work sustainably. This sometimes requires us to discuss workload and demands rather than simply “carrying on” when things become too much.

We support development, training and guidance, and pay attention to both physical and mental demands.

Forced labour

KIVO respects internationally recognised human rights and does not accept any form of child labour, forced labour, slavery, human trafficking or other forms of exploitation.

Dialogue and employee participation

We encourage engagement and open communication and maintain structured social dialogue through the appropriate consultation and employee participation structures.



5. Working safely is non-negotiable

At KIVO, working safely is part of professional craftsmanship. We focus on preventing accidents and systematically managing risks. Everyone has a role to play: safety is not just the responsibility of “QHSE”; it is the responsibility of all of us.

If something is unsafe, we stop and speak up. We would rather accept a short delay than risk an incident.

Environment and natural resources

We manage our impact on soil, water and raw materials and work to use materials and energy more efficiently. We comply with applicable laws and regulations and improve our processes and monitoring wherever possible.

Climate and greenhouse gas emissions

KIVO is working to understand and, where possible, reduce its climate impact across the relevant emission scopes: direct emissions from our own processes (Scope 1), indirect

emissions from purchased energy such as electricity and heat (Scope 2), and other emissions throughout the value chain (Scope 3), such as those associated with raw materials, transport and processing, insofar as these fall within our sphere of influence.

Human and animal health

We manage risks associated with emissions and exposure to substances that may affect health, including particulate matter and chemical components. We take preventive measures to avoid harmful effects.

Substances and chemicals: practical and specific

Where technically and economically feasible, we aim to substitute and phase out hazardous substances, including CMR substances (carcinogenic, mutagenic or toxic to reproduction). We periodically evaluate any CMR substances that are present.

6. Doing business fairly: integrity and ethics

At KIVO, integrity is not just a word; it is a standard. We act honestly, transparently and professionally. Decisions are made on sound business grounds, not for personal gain.

Corruption, bribery, fraud and money laundering

All forms of corruption, bribery, fraud and money laundering are prohibited, without exception.

Conflicts of interest

We avoid situations in which personal interests could conflict with KIVO's interests. If there is any doubt as to whether something could constitute a conflict of interest, we discuss and disclose it.

Gifts and invitations

We do not accept benefits, such as gifts,

invitations or services, that could create the impression that a decision can be bought or influenced. If in doubt, do not accept it and discuss the situation first.

Always consult our gifts policy to ensure clarity in advance. This also applies to suppliers and other contractors you interact with as part of your role.

Fair competition

KIVO conducts business fairly. Agreements or arrangements that restrict competition or distort the functioning of the market are not compatible with the way we do business at KIVO.





7. Information, confidentiality and company assets

We handle all KIVO information and digital resources with care. We use them for their intended purpose: our work. This means that systems, information and digital facilities must not be misused for inappropriate activities.

We protect KIVO information in all its forms. This means correctly classifying information, storing it securely, sharing it carefully, keeping it up to date and deleting it when necessary. In doing so, we comply with applicable laws and regulations and internal policies, including our privacy and information security requirements.

If you are unsure whether information may be shared, how it should be stored or which tools you are permitted to use, ask first. For example, you can contact the Information Security Officer.

If we become aware of an actual or potential information security incident, data breach or cyber incident, we report it immediately through the designated procedure.

Protecting information and digital resources is a shared responsibility and an integral part of working professionally and reliably at KIVO.

8. Responsibility throughout the value chain (suppliers and partners)

KIVO recognises that our impact is not limited to our own factories but extends throughout the value chain.

We therefore expect suppliers and business partners to act responsibly with regard to human rights, working conditions, the environment and integrity.

These expectations are set out in our Supplier Code of Conduct, including, among other matters, our approach to hazardous substances and ethical business practices.



9. Product safety, quality and fair market practices

At KIVO, we take responsibility for the products and solutions we develop, manufacture and place on the market. Product safety and quality are not merely prerequisites; they form the foundation of our craftsmanship and our licence to operate.

We ensure that our products comply with applicable laws and regulations, relevant standards and agreements with customers. This means carefully considering material choices, processes and controls, and never dismissing or passing on risks. If something does not meet our requirements, we do not place it on the market.

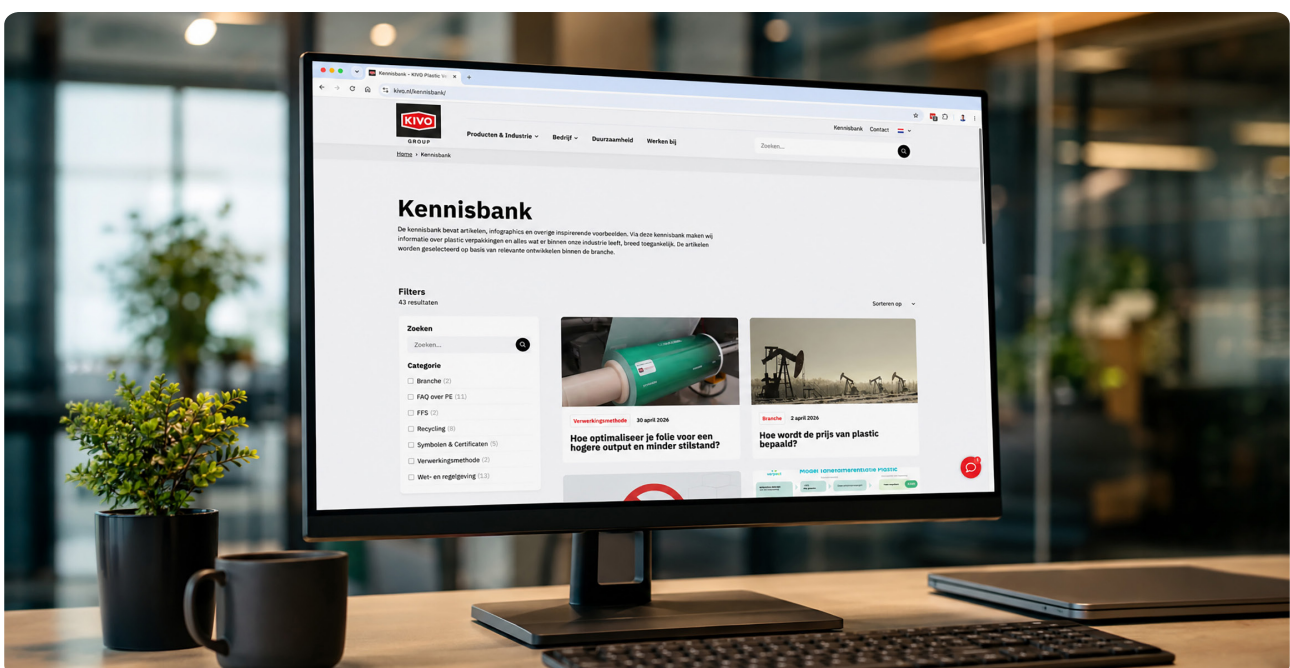
At KIVO, quality is not the responsibility of a single department; it is everyone's responsibility. Everyone involved in design, production, sales, logistics or support contributes to safe and reliable products. We report deviations, errors or concerns promptly and resolve them together. We would rather

address an issue early than deal with the consequences afterwards.

We are also honest and careful in how we communicate about our products. We do not make false, misleading or exaggerated claims about performance, safety, sustainability or potential applications. What we promise must be accurate and substantiated. Marketing and commercial communications are based on facts and transparent information, not wishful thinking or pressure from the market.

When customers have questions about the use, properties or risks of our products, we provide clear and accurate information. If something is not possible or cannot be done responsibly, we say so openly.

Short-term profit must never take precedence over safety, quality and long-term trust.



10. Identifying and discussing risks

Doing business involves risks. Managing these risks is essential to executing our strategy and operating in accordance with our own agreements, values and policies.

At KIVO, we expect everyone to be aware of the risks associated with their work and not to ignore or pass them on. Identifying and discussing risks in good time helps us prevent problems and take corrective action before they escalate.

Everyone has a role to play. Anyone who identifies risks relating to safety, quality, integrity, information, the environment or collaboration should speak up or raise the matter through the appropriate channel. This also applies when something simply does not feel quite right. It is better to ask one question too many than to identify a problem too late.

Not everyone at KIVO is exposed to the same

risks. Some issues logically require greater awareness in specific positions or roles. For example, the risk of corruption, bribery or conflicts of interest is particularly relevant to positions involving procurement, sales, investments, tenders or decision-making.

Physical workplace safety, on the other hand, is particularly relevant to roles within our factories, logistics operations and Technical Department. We take these differences into account when providing information and training on the various topics.

Identifying risks is not a sign of mistrust, but of professionalism. By looking openly, practically and together at where risks may arise, we maintain control of our organisation and remain a reliable partner for colleagues, customers and business partners.



11. Reporting concerns, speaking up and learning

At KIVO, we consider it natural to hold one another accountable and discuss matters when something is not right. This applies to inappropriate behaviour, integrity issues, unsafe situations, discrimination and other concerns affecting our work and collaboration. Openness and respectful dialogue are our starting points, from the factory floor to the Board of Directors.

In many cases, the logical and appropriate first step is to discuss the matter directly with your immediate manager, HR or, if that feels more appropriate, directly with a member of the Board of Directors. We want to encourage this open line of communication. You should feel safe enough to express yourself, both during meetings and in one-to-one conversations.

At the same time, we recognise that this may not always feel comfortable or possible. KIVO therefore provides several confidential and independent channels where employees can seek advice, support or report a concern. These include the Confidential Adviser, Whistleblower Reporting Channel, Occupational Physician and Works Council. Matters raised through these channels are handled with the highest degree of discretion, care and confidentiality.

Anyone who speaks up or reports a concern in good faith must not suffer negative consequences. We do not tolerate unfair treatment, pressure or retaliation resulting from raising a concern. Protecting one another and taking concerns seriously are part of working professionally and respectfully at KIVO.

The purpose of reporting concerns and speaking up is not to assign blame, but to learn, improve and prevent recurrence. By discussing concerns in good time, we keep our organisation safe, ethical and consistent with who we want to be as KIVO.

Confidential Adviser

Julia Jongert

Telephone
0615566929

Email
julia@juliajongert.nl

Occupational Physician

Eveline van den Hogen

Email
info@bedrijfsartsvolendam.com

Works Council

Telephone
0299398832

Email
OR@kivo.nl

Dick Veerman (Chair), **Ron Steur** (Secretary), **Joost Gunther** (Vice-Chair), **Wim van Es**, **Rene Vermeulen**, **Eddy Koning**, **Pascal Hoogendoorn**.

Employees can contact any member of the Works Council with questions, concerns or reports. Where no contact details are provided, these Works Council members can be approached directly on the work floor.

Whistleblower channel

Telephone
088 – 1331 030

Email
info@huisvoorklokkenluiders.nl

Privacy and IT security

Email
privacy@kivo.nl / security@kivo.nl

12. Closing statement: this is ours

This Code only works if we know it, recognise it and apply it: in the office, in our factories, at customers' premises and throughout the value chain. We use it as a compass to assess behaviour, discuss dilemmas and make the right choices every day.

Everyone working under the KIVO name is expected to comply with this Code of Conduct. Where necessary, underlying policies and procedures provide further guidance on the topics covered by this Code.

- The Board of Directors adopts the Code of Conduct.
- Managers lead by example.
- HR supports awareness and training.
- Everyone complies with the Code of Conduct.

In the event of deliberate, serious or repeated violations, KIVO may take appropriate measures in accordance with applicable policies and legal requirements.

This Code of Conduct is reviewed periodically and updated where necessary.



