

Code of Conduct

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This English version is an AI-generated translation of the original Dutch version; in the event of any discrepancies, please refer to the Dutch version.

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1 INTRODUCTION AND SCOPE

1.1 Introduction

Holland Innovative B.V. is a project agency specialising in project management, reliability engineering, problem-solving, artificial intelligence, data analysis, systems engineering and medical product development. We work with people, for people. Our position as an organisation entails responsibilities, including with regard to our conduct: towards visitors, clients and employees (and vice versa), towards one another as colleagues, and within the employee-employer relationship.

The purpose of this Code of Conduct is to establish and communicate the standards we use when assessing our own conduct and that of others. The guiding principle is that integrity, honesty, respect, customer friendliness and a safe, inclusive working environment must always be maintained.

This Code of Conduct is binding on all employees and third parties who work with Holland Innovative. Violations may result in disciplinary measures. The purpose of this Code is to establish standards and values that contribute to a safe, inclusive and respectful working environment.

1.2 Employees

This Code applies to employees working under an employment contract, cooperation agreement, contractor agreement, temporary agency work agreement or internship agreement, as well as to the Management Board.

1.3 External parties

External parties are expected to comply with this Code of Conduct.

1.4 Adoption and publication

This Code of Conduct is adopted by the Management Board and communicated widely, including via SharePoint and the external website. It is evaluated annually together with the staff representation body (PVT).

2 DEFINITIONS

2.1 Organisation

Holland Innovative B.V., including its Management Board and the persons or bodies authorised to make decisions or implement policy on behalf of the organisation.

2.2 Management Board

The persons formally entrusted with the day-to-day and strategic management of the organisation, including the managing directors and other authorised officers designated by the Management Board who may make decisions on behalf of the organisation.

2.3 Manager

The manager/competence lead under whose responsibility an employee falls, unless otherwise designated by the Management Board.

2.4 Employees

All persons who work for the organisation in any capacity, including employees under employment contracts, cooperation agreements, contractor agreements, temporary agency work agreements, internship agreements and temporary holiday workers.

2.5 External parties

Anyone who is not employed by the organisation but who is in any way involved in or present at the organisation's activities, services or locations. This includes participants in training courses and events, clients, suppliers, partners, applicants, visitors to company premises and other third parties who come into contact with the organisation.

2.6 Inappropriate conduct

Acts that may be considered hostile, humiliating or intimidating, including in any event sexual harassment, aggression and violence, bullying, discrimination and stalking. The essential principle is that the person subjected to the conduct determines what is considered inappropriate conduct.

2.7 Confidential adviser

An external officer who serves as a point of contact for reports and works with the reporting person to identify solutions and provide support.

3 GENERAL STANDARDS OF CONDUCT

3.1 Personal responsibility for conduct

We act professionally and can be held accountable for our choices and conduct; where necessary, we explain the choices we have made and take responsibility without hiding behind rules or colleagues.

Practical example:

- *You have made a mistake in relation to a client. You immediately report this to your manager and cooperate with remedial measures.*

3.2 Respectful conduct

Interactions among employees and with business contacts and visitors are guided by respect for every individual, regardless of characteristics such as origin, gender identity, age, beliefs, disability or other personal characteristics. Discrimination, bullying, aggression and sexual or other harassment are not permitted. When assessing inappropriate conduct, the experience of the person subjected to the conduct is decisive.

Practical example:

- *During a team meeting, someone makes a "joke" about a person's origin or religion. Even if no offence was intended, you point out that this is inappropriate.*

3.3 Agreements must be honoured

We honour agreements regarding work, deadlines and meetings. If unforeseen circumstances make this impossible, we communicate this as promptly as can reasonably be expected and make a new arrangement.

3.4 Transparency

We are willing to explain our actions, with due regard for privacy rules and confidentiality. We view questions about our actions as requests for information, not as unwelcome interference.

3.5 Scale and appropriateness of activities

For activities such as team days, social drinks, training courses or social gatherings, we make a reasonable assessment of the activity's appropriateness and scale. We consider its purpose, target group, costs, location, safety and the organisation's professional image.

If there is any doubt about an activity's suitability, risks or proportionality, the proposal is always submitted to the manager or, if the impact is greater, to the Management Board. The activity may not take place without their approval.

Practical example:

- *A team member proposes organising a gambling-related outing. Because this does not fit HI's professional image, the proposal is rejected.*

3.6 Property belonging to others

We handle other people's property and company assets with care. For loans or safekeeping, we make written arrangements. Company laptops and phones are included; valuable assets are subject to additional arrangements regarding management, security and return upon termination of employment.

3.7 Reporting problems

Situations that conflict with this Code can be discussed. Preferably discuss the matter first with those involved; if this does not lead to a solution, report it to the manager. If that is not possible, report it to the manager's manager or to the external confidential adviser.

3.8 Compliance and consequences

We are jointly responsible for complying with this Code of Conduct. Every employee is expected to act in accordance with the standards and values set out in it and to be open to feedback on their own conduct.

Conduct that conflicts with this Code of Conduct is taken seriously and assessed carefully. Depending on the nature, seriousness and circumstances of the situation, the organisation may take appropriate measures. These may range from a discussion or warning to suspension or termination of employment.

Reports of possible breaches of standards are handled in accordance with the applicable procedures and with due care, confidentiality and the right of all parties to be heard.

Practical example:

- *After several discussions, an employee continues to make inappropriate remarks towards colleagues. The organisation assesses the situation and takes appropriate measures in accordance with employment law and internal policy.*

4 DEALINGS WITH EXTERNAL PARTIES

4.1 The organisation's responsibility for quality and conduct

The organisation can be held accountable for the quality and conduct of its employees. Concerns or indications raised by external parties are investigated seriously and measures are taken where necessary. This does not alter the expectation that employees take personal responsibility.

4.2 Professional conduct and appearance

Employees present themselves professionally in their attitude, language and dress, in a manner appropriate to the situation and client context.

Practical example:

- *For a formal client presentation, you choose business attire; for a technical workshop, professional casual clothing may be appropriate.*

4.3 Use of alcoholic beverages and intoxicating substances

Use is not permitted during, before or after the performance of work if it may affect performance or safety. At networking drinks and social gatherings, alcohol must be consumed in moderation and professionally, with a maximum of one to two drinks and only when this is safe and appropriate. Medication is not covered by this prohibition unless it demonstrably makes the person unfit to work or makes working unsafe. These arrangements apply at the organisation's premises, client locations and external activities where a person is acting on behalf of the organisation.

4.4 Relationships and boundaries

Family relationships or relationships of trust with business contacts must be reported to the manager. Business contacts may be received at an employee's home only with the manager's prior approval.

4.5 Gifts

Tokens of appreciation up to €50 are permitted and must be reported to the manager, who assesses their appropriateness and value. Gifts in cash, gifts delivered to an employee's home or gifts offered in secret are not accepted. Bribery and improper benefits are prohibited.

Practical example:

- *A client offers you a bottle of wine worth €20: reporting it is sufficient. A weekend trip offered as a thank-you is not permitted.*

4.6 Complaints from external parties

External parties may submit complaints about Holland Innovative's conduct or services. They may report these to their HI contact person, HR or the Management Board. Complaints are investigated carefully and, where necessary, handled in accordance with the internal reporting and complaints procedure (see also Article 5.7).

4.7 Inappropriate conduct by external parties

The organisation expects external parties to respect the standards in this Code of Conduct. In the event of inappropriate conduct or conduct that breaches standards, the organisation takes

appropriate measures to protect employees. Depending on the situation, this may include addressing the person concerned, terminating the cooperation or imposing a ban from the premises.

5 THE WORKING RELATIONSHIP

5.1 The employment relationship

When entering into, amending or terminating employment relationships, we apply objective, role-relevant criteria; prohibited grounds of discrimination play no part. These criteria are established by Holland Innovative's Management Board, in coordination with HR and in accordance with applicable laws and regulations.

5.2 Conduct in the workplace and the exemplary role of managers

Employees treat one another with respect. Managers serve as role models and take action against inappropriate conduct; reports are handled seriously and carefully.

5.3 Reporting intimate relationships

Intimate relationships may affect the working relationship. If there is a hierarchical relationship, reporting it to the manager and HR is mandatory. In exceptional cases, for example involving the Management Board or HR, it must be reported to the Management Board or supervisory body.

Practical example:

- *A direct report enters into a relationship with a manager who assigns projects. HR arranges a different working structure to prevent conflicts of interest.*

5.4 Company property and use of facilities

The organisation's property is managed with care and used exclusively for work purposes, unless otherwise agreed in writing. Upon termination of employment, all assets, such as keys, badge, phone and laptop, must be returned no later than the final working day. Private use of facilities is permitted only with written approval.

5.5 Telephone, internet and email

These resources are used primarily for business purposes; limited private use is permitted provided that it is not disruptive or inappropriate. Visiting websites or sharing material that is pornographic, discriminatory, hateful or otherwise offensive is prohibited. Details on monitoring and security are set out in the IT rules.

5.6 Benefits arising from business relationships

Benefits arising from business relationships, such as discounts, invitations to events, training courses or other benefits received by an employee because of the business relationship, accrue in principle to the employer. Employees must always report such benefits to their manager, who assesses whether the benefit is appropriate and whether it may be accepted. This prevents conflicts of interest and safeguards a professional relationship with clients and suppliers.

Practical example:

- *A supplier invites you to an exclusive technology conference including dinner. You report this to your manager, who assesses whether attendance is in the organisation's interests*

and whether the benefit complies with the integrity rules. Attendance may sometimes be permitted, but the organisation pays the costs itself to prevent a conflict of interest.

5.7 Reports and confidential adviser

Employees may always discuss concerns, reports or suspected violations of this Code of Conduct. The standard reporting route is as follows:

1. Preferably discuss the situation first with the person or persons involved, if it is safe and appropriate to do so.
2. Report the situation to your manager, who is responsible for follow-up.
3. If the report concerns the manager's conduct, report it to the manager's manager or to the Management Board.
4. For sensitive or confidential matters, such as inappropriate conduct or integrity issues, the employee may contact the external confidential adviser directly. The confidential adviser provides confidential support, discusses possible next steps and guides the employee where desired.

The confidential adviser never reports substantive details to the organisation without the reporting person's permission, unless there is a legal obligation to do so.

6 PRIVACY AND PERSONAL DATA

The organisation processes personal data of employees and external parties only where necessary for proper business operations, compliance with legal obligations or performance of agreements. We limit processing to the data required for these purposes and do not retain it longer than necessary.

Personal data is protected against loss, unauthorised access or misuse. Only employees who require access for their role may access personal data. We are transparent about which data we process and for what purposes.

Employees have the right to access their data, have it corrected or deleted, and may direct questions to HR.

7 SOCIAL MEDIA CODE OF CONDUCT

7.1 General principles

Social media offer opportunities to showcase our work, but may also create risks for privacy, confidentiality and the organisation's reputation. We use social media professionally and carefully. This Code applies to work-related messages and to private statements that concern the organisation or its clients.

7.2 Use in the workplace

Employees may be active on social media during working hours, provided that this does not interfere with their work and the post is work-related. We do not share confidential information about the organisation, clients or partners, or photographs or videos of workplaces, whiteboards, materials or people without permission.

7.3 Private use

In private statements about the organisation, employees make clear that they are expressing their personal opinion and do not share commercially sensitive or confidential information. If in doubt, they seek advice from their manager. Employees in representative roles, such as members of the Management Board, competence leads, consultants and trainers, exercise particular care because their statements may more readily be interpreted as official.

Practical example:

- *You are proud of a client project, but a whiteboard is visible in the background → do not share the photo without permission.*

7.4 Interaction with clients and the public

We do not respond on behalf of the organisation through personal social media channels. Complaints, questions or discussions are referred to the appropriate contact person within the organisation.

7.5 Measures

Careless use or a violation of these guidelines will lead to a discussion and, if necessary, handling in accordance with the regular HR policy.

8 CODE OF CONDUCT FOR INTERNET AND EMAIL USE (SUMMARY)

Internet and email are primarily for business use; limited private use is permitted when it is not disruptive and remains within the applicable standards. Unauthorised use, such as accessing pornographic, discriminatory or hateful material or downloading malicious software, is prohibited. Monitoring and retention periods, as well as roles and authorities, are set out in the IT rules.

Practical example:

- *An employee unintentionally downloads malware through private use. The organisation takes appropriate measures but also assesses proportionality.*

9 SANCTIONS POLICY

Measures taken in response to violations of this Code of Conduct are always considered carefully and are proportionate. The seriousness of the conduct, the employee's intent and whether the conduct is repeated are taken into account. Depending on these factors, the organisation may take various steps, ranging from an informal discussion to termination of employment. This will often begin with a coaching discussion or warning, followed where necessary by more serious measures, such as temporary adjustment of duties, exclusion from certain activities or denial of access to systems or locations. Where violations are serious or repeated, termination of the employment agreement may be necessary.

10 FINAL PROVISIONS

This Code of Conduct forms part of HI's employment agreements and organisational structure. Employees may contact HR, their manager or the confidential adviser with any questions.