

Code of Conduct

GTE Group B.V. & All Affiliates and Group of Companies

Policy brief & purpose

Dear Colleagues,

We are proud to introduce to you our new code of conduct for the GTE Group B.V. and all affiliates and group of companies.

We took all necessary steps by not sparing any effort to ensure that every employee from the management to the workshop had received an extensive training on compliance rules and behaviour, provided by one of the most rigorous, professional and pioneer compliance bodies of one of our suppliers.

We promote freedom of expression and open communication. But we expect all employees to follow our code of conduct. They should avoid offending, participating in serious disputes and disrupting our workplace. We also expect them to foster a well-organized, respectful and collaborative environment.

Our **Employee Code of Conduct company policy** outlines our expectations regarding employees' behaviour towards their colleagues, supervisors and overall organization.

The management Board and the Shareholders of the company does unilaterally adhere to the Code of Conduct as management compass promoting the rules and regulations in their daily duties fulfilment, please do so as well and let us spread the compliance word.

Kind regards

Marcel van Vliet

CEO



Scope

This policy applies to all our employees regardless of employment agreement or rank.

Policy Elements

What are the components of an Employee Code of Conduct Policy?

Company employees are bound by their contract to follow our Employee Code of Conduct while performing their duties. We outline the components of our Code of Conduct below:

Compliance With Law

All employees must protect our company's legality. They should comply with all environmental, safety and fair dealing laws. We expect employees to be ethical and responsible when dealing with our company's finances, products, partnerships and public image.

Respect in the Workplace

All employees should respect their colleagues. We won't allow any kind of discriminatory behaviour, harassment or victimization. Employees should conform with our equal opportunity policy in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

Protection of Company Property

All employees should treat our company's property, whether material or intangible, with respect and care.

Employees:

- Shouldn't misuse **company equipment** or use it frivolously.
- Should respect all kinds of **incorporeal property**. This includes trademarks, copyright and other property (information, reports, intellectual property, etc.) Employees should use them only to complete their duties.

Employees should protect company facilities and other material property (e.g. company cars, tools, Workshop Equipment, ...) from damage and vandalism, whenever possible.

Professionalism

All employees must show integrity and professionalism in the workplace:

- **Personal Appearance**

All employees must follow our dress code and personal appearance guidelines.

- **Corruption**

We discourage employees from accepting gifts from clients or business partners. If employees receive gifts from an external party, they are obliged to report this to their supervisor or manager, despite the financial value of the gift. The manager will evaluate if the gift can be kept. We prohibit the giving or receiving of bribes for the benefit of any external or internal party.

- **Duties and Authority**

All employees should fulfil their duties with integrity and respect toward customers, stakeholders, colleagues and the community.

Supervisors and managers must not abuse their authority.

We expect supervisors and managers to delegate duties to their team members in consideration of each team member's competency and workload their competences and workload. Likewise, we expect team members to follow team leaders' lawful and reasonable instructions and perform their duties with care, skill and in a timely manner.

We encourage mentoring throughout our company.

- **Absenteeism and Tardiness**

Employees should follow the schedules of the company according to their employment contract. We expect employees to be punctual when coming to and leaving from work. We can make exceptions for occasions that prevent employees from following standard working hours or days. Exceptions will be documented.

- **Conflict of Interest**

We expect employees to avoid any personal, financial or other interests that might hinder their capability or willingness to perform their duties.

- **Collaboration**

Employees should be friendly and collaborative. They should try not to disrupt the workplace or present obstacles to their colleagues' work.

- **Communication**

All employees must be free to engage in open and courageous communication with their colleagues, supervisors and team members.

- **Benefits**

We expect employees to not abuse their employment benefits. This can refer to time off, insurance, facilities, subscriptions or other benefits our company offers.

- **Policies**

All employees should read and follow our company policies. If they have any questions, they should ask their managers or Human Resources (HR) department. This policy is part of our employer manual.

Disciplinary actions

Our company may have to take disciplinary action against employees who repeatedly or intentionally fail to follow our code of conduct. Disciplinary actions will vary depending on the violation.

Possible consequences include:

- Demotion.
- Reprimand.
- Suspension or termination for more serious offenses.
- Detraction of benefits for a definite or indefinite time.

We may take legal action in cases of corruption, theft, embezzlement or other unlawful behaviour. This will have far-reaching consequences for the employment contract.

Unilateral change policy

The employer reserves the right to unilaterally change guidelines in this Code of Conduct if he has such an overriding interest that the interest of the employee that is harmed by the change must give way according to standards of reasonableness and fairness.

*We promote freedom of expression and open communication.
We expect all employees to adhere to our Code of Conduct.*