

Jansens & Dieperink



Code of Conduct

Introduction and Purpose

Jansens & Dieperink (“J&D”) is a global leader in site assembled aluminum and stainless steel silos, gravity blenders and vessels. For over 70 years J&D has been manufacturing and delivering these high-quality, custom-made structures worldwide, ranging from silos and tanks to process vessels and columns, through an integrated approach of in-house engineering and production and on-site assembly.

Our mission is to create value for our clients through best in class, most cost-effective products and solutions with a strong focus on quality, reliability and innovation. In doing so J&D has built a strong reputation with its customers, suppliers and partners. Preserving and strengthening this reputation is vital to the continuity and success of our company and requires us to act with professionalism and integrity at all times.

To that end the Code of Conduct describes the ethical and responsible behavior we expect from everyone. It emphasizes our core values and enables us to make the right decisions by providing a set of guiding principles for our interactions with colleagues, suppliers, clients and society as a whole.



Scope

The Code of Conduct takes into account the interests of our key stakeholders and applies to all our employees including temporary staff, interns and representatives working on behalf of J&D worldwide as well as agents and contractors acting on behalf of or working in cooperation with J&D.

Compliance with this Code and its provisions is mandatory for all employees regardless of role or department. By doing so, we ensure a safe, respectful and enjoyable workplace for everyone, while safeguarding the interests of the company and its stakeholders. Violations of this Code may lead to disciplinary action, up to and including termination of employment or contract, and potential legal proceedings.

We encourage our suppliers and business partners to adhere to the same ethical standards and principles as outlined in this Code. Long-term cooperation is only possible when based on trust, transparency, and shared values. Noncompliance may result in a review of the business relationship.

The Code complements and does not replace applicable laws and regulations. To the extent any local law or regulation is more restrictive than this Code, local law or regulation governs.

Our Core Values

At J&D we believe that professionalism and integrity are essential in all that we do, both in our external relationships and within our organization and cooperation with one another.

As a company we are guided by the following core values:

Health and Safety: The health and safety of our colleagues is fundamental to our success and is our shared responsibility. We prioritize on safe working conditions and promote an open and inclusive culture in order to prevent injuries and work-related illnesses.

Ownership: we take responsibility for the quality and the outcome of our work and we take initiative by getting ahead of problems and seeking opportunities that contribute to our performance.

Respect: we treat everyone with respect regardless of background, belief or identity and we act with honesty and integrity in all our dealings with each other, each other's belongings, confidential information and the environment.

Reliability: We build trust and long term relationships by consistently delivering high quality products and services while keeping our promises and following through on our commitments.

Continuous Improvement: We are committed to continuously learn, seek and implement incremental improvements or innovations to our products and processes in order to create value for our customers and secure our long term success.



Compliance

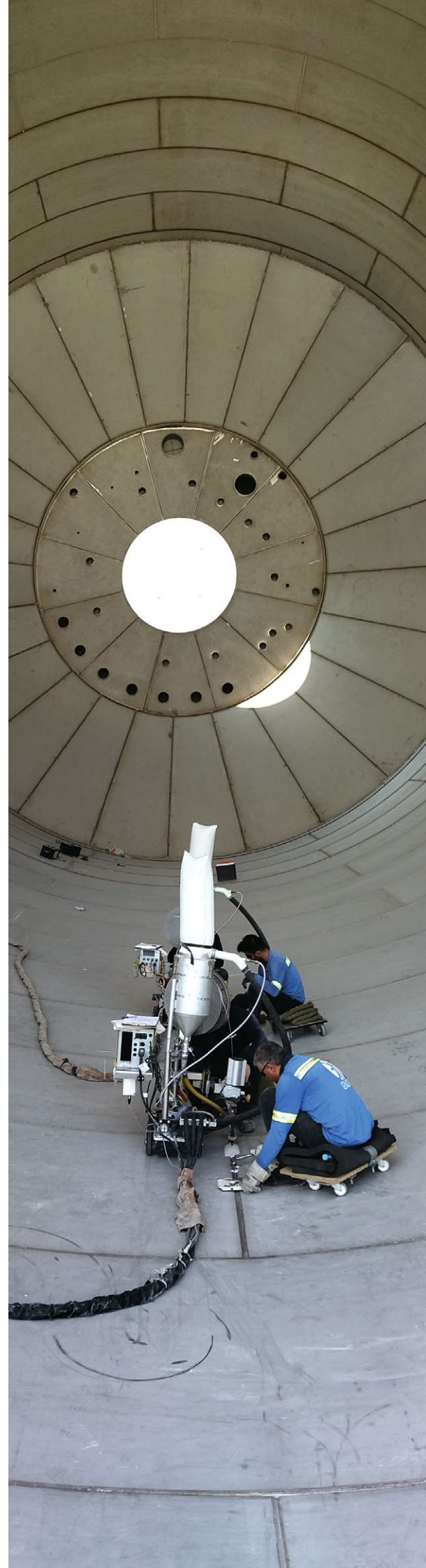
At J&D we conduct our business with honesty, integrity and fairness. It is key to our company values and extends beyond being competent and just doing a good job. As an employee you are expected to act in the best interest of J&D at all times, to safeguard its reputation and to treat colleagues, clients, third parties and the communities we work in with decency and respect. This includes avoiding any behavior that could constitute a breach of the Code or its underlying policies, regardless of location, local customs, or the belief that such conduct might benefit the company.

The following paragraphs contain a basic set of principles that guide us on how to act professional and make responsible decisions and that we expect everyone to adhere to. We realize that this guidance is not all encompassing. When faced with uncertainty or ethical dilemmas, employees are expected to seek guidance and report any suspected misconduct.

1. Business ethics and anti-corruption

At J&D we conduct our business with honesty, integrity and fairness. As such, we:

- operate in full compliance with international, national and local laws and regulations applicable to our business where the more stringent always prevails;
- do not tolerate any form of bribery or corruption such as offering, promising, giving, or receiving any improper payment or item of value to influence a decision;
- do not accept gifts, hospitality or entertainment of excessive value. These should be for business purpose only and must be small, reasonable, appropriate to the circumstances and should not obligate you/the recipient to anything;
- do not engage in fraud by intentionally deceiving or misrepresenting others for personal gain or business advantage;
- do not make any contributions or donations, whether cash or in kind, to political individuals or entities;
- respect applicable trade laws and restrictions and do not perform any activities that are subject to international and/or national sanctions or that involve dealings with sanctioned persons;
- carry out charitable donations transparently and properly recorded;
- conduct our business activities in fair competition and in accordance with all applicable antitrust, competition and fair trade practice laws;
- treat all information regarding J&D as confidential, protect it against unauthorized access and obtain written approval by J&D management prior to publishing or sharing any information including photo's with third parties.



2. Human Rights and Labor

At J&D we respect human rights and treat everybody with dignity, respect and fairness. We align ourselves with established global frameworks like the United Nations Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and adhere to national and international labor laws, including the conventions of the International Labor Organization and we adhere to the following guiding principles. We:

- refrain from forced labor, child labor, and exploitation;
- do not discriminate based on ethnicity, beliefs, physical appearance or orientation such as (but not limited to) race, color, age, gender, religion and sexual or political orientation;
- do not accept intimidation and bullying meaning that all behavior against someone or a group that is experienced as unwanted, humiliating, threatening, discriminatory or hostile will not be tolerated;
- respect fair working conditions, wages, and working hours;
- respect freedom of association and the right to collective bargaining.

A more detailed description of our human rights and labor principles can be found in our Human Rights and Labor Policy on our website <https://www.jansensanddieperink.com/nl>



3 Environmental protection

J&D acknowledges its responsibility to minimize its environmental impact and to contribute positively to society. Consequently, we:

- comply with all applicable environmental laws and regulations;
- use resources responsibly and avoid waste;
- support initiatives for recycling, energy efficiency, and sustainable practices;
- respect the communities in which we operate;
- timely identify potential adverse environmental and social impacts and take appropriate mitigating measures.

4 Health, safety and quality

At J&D we are committed to ensure a safe and healthy working environment in compliance with applicable laws and regulations, for which we:

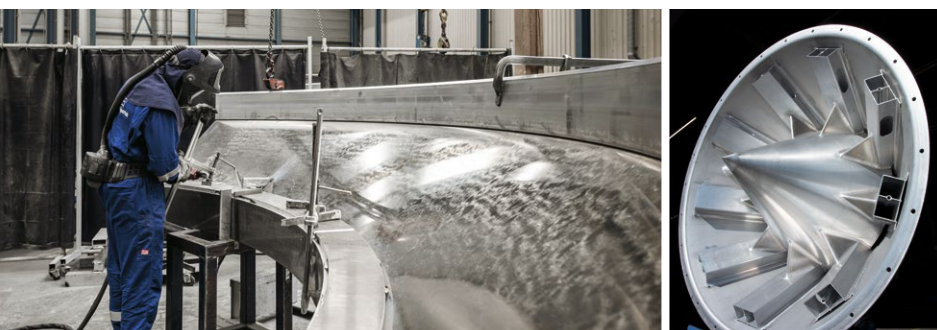
- work safely and adhere to the prevailing safety instructions at all times;
- employ dedicated and professional personnel qualified for the job and with the relevant experience regarding the risks involved;
- provide safe machinery, tools and equipment as well as suitable free personal protective equipment and adequate sanitary facilities;
- provide training and instructions to identify and manage known risks, including emergency procedures;
- follow our safety management procedures to report and record incidents, investigate and learn from it as an organization and take effective measures for future prevention;
- report deviations in our quality management system with the aim of achieving continuous improvement in our business processes.



Governance

The Managing Board, Compliance officer and HR officer are responsible for the implementation of and compliance with this Code. Managers are expected to lead by example, ensure that employees are familiar with the Code, and take immediate action in case of violations. HR supports compliance through policies, training, and reporting mechanisms.

The Managing Board reviews the Code at least every two years to ensure it remains effective. Internal audits may be conducted to assess compliance.



Report (Suspected) Misconduct and Grievance

Misconduct or undesirable behavior shall always be reported. Everyone who observes such behavior are under an obligation to escalate it to HR or the Managing Board without delay.

Employees may also directly contact HR or the Managing Board if they witness or experience such conduct, or even if they are in doubt as to whether behavior falls within the scope of this Code.

In addition, Jansens & Dieperink has implemented a secure whistleblowing platform (GlobaLeaks). The platform stores no data, ensuring complete anonymity for whistleblowers. Even when accessed via a shared browser, the system is designed to safeguard confidentiality to the greatest extent possible. Anonymous reports are received by the Managing Director and HR. Reports may be submitted via <https://globaleaks.jandd.nl>.

All reports are treated confidentially and taken seriously. And as mentioned, this Code of Conduct is not without obligation. If there is unacceptable behavior, HR/ the Managing Board will also sanction this. These sanctions may vary depending on the severity, nature and circumstances.

External stakeholders who interact with Jansens & Dieperink—whether in relation to a project, subsidiary, or employee—may also raise a grievance to HR or the Managing Board. Grievances may, upon request, be treated on a confidential basis.

J&D encourages employees to voice concerns without fear of retaliation. Retaliation against whistleblowers or complainants will not be tolerated. Employees may submit grievances to HR, the Managing Board, or through the anonymous whistleblowing channel.

Sanctions and Zero Tolerance

J&D applies a zero tolerance policy to theft, fraud, embezzlement, and corruption. Confirmed violations will generally result in immediate dismissal and may be reported to law enforcement.

Other misconduct may result in disciplinary measures, including a formal warning, reassignment, suspension, or termination of employment, depending on severity and circumstances.



Training and awareness

All new employees receive a copy of the Jansens & Dieperink Code of Conduct when they join the company. As part of the introduction program, training will be provided on the Code of Conduct to ensure that every employee understands its purpose and application.

Employees will annually receive an invitation for repetitive training on the Code of Conduct. Attendance and sign-off are required.



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