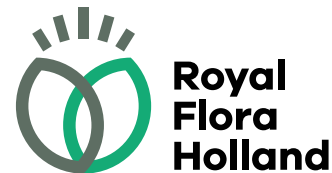




Code of Conduct.

This is how
we work.

2022 Version



CONNECT TO GROW



Preface

In order to ensure that everybody can work safely and pleasantly, Royal FloraHolland has drawn up this Code of Conduct.

This Code of Conduct applies to everyone who works at Royal FloraHolland on the basis of an employment contract (hereinafter: employees), and to all third parties hired in who do not have an employment contract with Royal FloraHolland, such as temporary workers, secondees, trainees and interim staff/ self-employed professionals (hereinafter: third parties hired in).

The purpose of the Code of Conduct is to help employees and third parties hired in to become acquainted with and apply our rules, standards and values. The Code of Conduct is divided into seven topics. Each topic discusses the kind of conduct we expect from you, and how you can interpret that correctly. This makes it clear to everybody how we

conduct ourselves at Royal FloraHolland. The Code of Conduct is a framework for underlying policy documents and protocols.

If you have questions or comments regarding this Code of Conduct, please feel free to discuss them with your manager, HR Business Partner or Compliance Officer. The Code of Conduct is issued to every employee. New employees receive a copy of the Code of Conduct upon commencement of employment. More information can be found on the intranet.

Other users of the marketplace, such as suppliers, growers, customers and contract partners (hereinafter: other users of the marketplace) must also adhere to this code of conduct. If you have any questions or comments, please contact our Customer Service.

Inhoud

Preface	3
1. Our core values	7
2. Good conduct	11
3. Honesty in business	16
4. Working safely	22
5. Protection of information	26
6. Working sustainably	30
7. Compliance	34
Appendix 1 more information	38
Appendix 2 Reporting undesirable behaviour	40
Appendix 3 Reporting undesirable behaviour.	42



“

Our employees think in terms of options and possibilities and don't let go until matters are resolved. This is only possible if we create a safe environment together with consideration and respect for each other.

Together we ensure that Royal FloraHolland remains a global player: together, we create opportunities for growth!

”

Steven van Schilfgaarde

CEO Royal FloraHolland





1. Our core values

We can get anything done if we reach out to one another, think in terms of solutions, are willing to try new things and learn from our mistakes. And, of course, we want to be reliable. This is how we can constantly make new connections and achieve results

We believe that we can fulfil our ambitions by always getting the best out of ourselves. Without you, our ambitions will remain nothing but big plans. Together, we create the future. As we have done for the past 100 years, we bring the best people together to make the industry grow.

We continuously work together on developing our organisation, in line with our core values:

Collaborative, results-orientated,
innovative and reliable.

Collaborative

We opt for the collective. That is the essence and strength of our cooperative. We always seek out collaboration; with each other and with members, customers and other players in the floriculture industry. Our common interests come before our individual ones. We also discuss what is going well and where there's room for improvement.

Results-orientated

What we do always has added value for our customers. Our goals are ambitious and we know how to convert them into concrete actions. We finish what we start. We agree on clear role divisions and also stick to this. Giving, taking and bearing responsibility in order to achieve our goals and deadlines is of paramount importance. And we keep on asking until the other party's question is clear.

Innovative

Together with our members we develop new services and improve existing ones. We display entrepreneurship and are open to new ideas that lead to improvements. Innovative thinking is in our DNA. We allow people to try out new things and learn from mistakes. And we actively seek inspiration from members, customers, colleagues and other organisations.

Reliable

We ensure a safe working environment, by treating each other with respect and abiding by the rules of conduct. We're honest and clear in our communications. Because we work based on our core values, we set a good example. We abide by the agreed processes and procedures, and we accept the choices and decisions made. Content and work processes go hand in hand if we work in a competent and structure way based on data and facts.



“

We encourage innovation that contributes to the sustainable growth of our organisation.

”

This is what we stand for:

We are **honest** and **transparent**.

We stick to the **agreements**.

We go for **results**.

We work **together**.

We **improve** ourselves.



2. Good conduct

Together, we ensure that Royal FloraHolland is an organisation people want to work for and do business with. Everybody contributes to this and has their responsibility in this respect.

We encourage good conduct and give compliments. We address each other about undesirable behaviour, and report it to the manager or another person, see the appendix 'Reporting undesirable behaviour'.

At Royal FloraHolland, every employee, third party hired in and other user of the marketplace is different. We understand the value of these differences and respect each other. We work together in a pleasant and professional manner.

Undesirable behaviour disrupts the working environment. Undesirable behaviour, such as theft, fraud, corruption, threatening behaviour, bullying, sexual or other forms of intimidation and discrimination, is not tolerated in any way within Royal FloraHolland.





“

I enjoy going to work every day. If I notice one of my colleagues being bullied, or if a customer exhibits undesirable behaviour, then I call that person to account for this and I report it.

”

Integrity

We respect and enforce the Royal FloraHolland Code of Conduct. In addition to our Code of Conduct and the [Auction Regulations](#), Dutch legislation and regulations also apply, of course, at our locations.

Collaboration

At Royal FloraHolland, we work together and learn from each other. It's important that we tell each other what's going well and what can be improved. This reinforces our collaboration, safety and the quality of our work.

Absenteeism

We also work together when it comes to absenteeism. Together, we strive to keep absenteeism as low as possible. Absenteeism is annoying for you, your colleagues and the organisation. That is why absenteeism rules apply. The principle is that anybody can become ill, but you discuss absenteeism.

Communication

Poor communication = poor cooperation. For that reason, our words and attitude are respectful, honest and constructive.

Respect

At Royal FloraHolland, we are respectful towards each other. We treat others as we would like to be treated ourselves. We listen to each other, show understanding and are friendly.

Equality

We treat each other equally. A person's age, gender, race, religion, appearance, sexual orientation or professional mobility is irrelevant. In the event of undesirable behaviour, we call each other to account and report it.

Professional

We display a professional and appropriate attitude when we work for, on behalf of or at Royal FloraHolland. For this reason, we screen everyone who works for us. We perform our duties professionally. For the rest, we choose our words carefully.

Company resources

Royal FloraHolland makes company resources available, such as keys, staff cards, laptops, mobile phones, company cars, loan bicycles, logistic supplies, etc. Our employees, third parties and other users of the marketplace can use these and handle them with care. We always report any loss, theft, misuse or damage.

Theft

We are honest. If a theft is suspected, we immediately report it to Security. This applies to both internal and external cases of theft. The report is investigated and, if necessary, reported to the police.

Vandalism

Destroying or inciting the destruction of property belonging to Royal FloraHolland, employees, third parties hired in or other users of the marketplace is unacceptable.

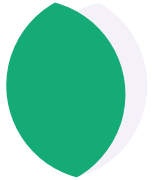
Transgressive behaviour

Royal FloraHolland attaches great importance to social safety. Threatening behaviour, harassment, sexual harassment and any other form of transgressive behaviour are unacceptable. We encourage everyone to report transgressive behaviour immediately.

Weapons and violence

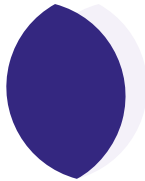
All forms of violence are unacceptable. It is prohibited to bring weapons or dangerous objects to Royal FloraHolland.





This is what we stand for:

- We treat each other **respectfully** and **professionally**.
- We are **friendly** and address each other **politely**.
- We treat each other **equally**.
- We respect and follow the applicable **rules**.
- We report unacceptable and undesirable behaviour.



What we don't do:

- We do not accept threatening behaviour or intimidation.
- We do not vandalise or steal.
- We do not commit acts of violence or carry weapons.

3. Honesty in business

Royal FloraHolland stands for honesty in business. Rules have been drawn up for this by which we abide. A few of these rules come from the government, while others we have drafted ourselves.

We do not make illegal price or market-fixing agreements with other parties. We promote healthy competition and market innovation. Business and private interests are always kept strictly separate.

Business partners

At Royal FloraHolland, we only work with parties who are reliable. We carefully investigate potential business partners. We are alert and report any irregularities immediately.

Competition

The aim of competition law is to combat unfair competition in the market. Royal FloraHolland does not do business with parties who limit competition in the market.

We act in accordance with the Dutch Competition Act and do not share information with competing companies concerning the following topics:

- coordination of prices, rates or conditions;
- sharing the market or customers and associated price agreements;
- competitively sensitive information, such as business strategy, prices, pricing models, market shares and sales figures;
- submission of a tender.

If you're unsure about whether certain information may be shared, please raise this with the Compliance Officer.

Insider trading

Insider trading is gaining an advantage on the basis of information that hasn't been made public. It can disrupt the market. Insider trading for personal gain or the benefit of individual customers is a crime.

Import

At Royal FloraHolland, we deal with goods and services that are imported. All these goods and services must meet the conditions prescribed by law. In so far as these goods and services enter the marketplace, we facilitate the responsible authorities, such as customs and inspection services, so that they can perform their work in the marketplace.

Influence

Honesty in business is only possible if we don't allow ourselves to be influenced by other parties. At Royal FloraHolland, we don't allow ourselves to be influenced in order to gain commercial advantage through unauthorised means. Likewise, we don't put other parties under pressure either. We discuss all forms of influence in order to remain honest in our decisions.



Corporate gifts and invitations

At Royal FloraHolland, we apply due diligence with respect to offering and receiving corporate gifts and invitations. We only do this if nothing is expected in return. As a result of this, we do not distort the normal functioning of the market. Before accepting corporate gifts or invitations, we must always consider first whether the gift or invitation is in proportion to the customer relationship.

For this reason, this must always be reported to the manager. Corporate gifts and invitations with a value in excess of 50 euros may only be accepted with prior written consent from a manager. Accepting flowers or plants from a grower, customer or supplier is not permitted. Accepting cash is not permitted under any circumstances. In this way, we ensure our company and the market remain uncorrupted and we prevent any (apparent) violation of integrity.

Fraude en corruptie

Fraude en corruptie (zoals steekpenningen of omkoping) is onacceptabel. Bij een vermoeden hiervan melden we dit direct. De melding wordt onderzocht.

Tips

When paying for a business lunch or dinner, we leave an appropriate tip. The tip should be in line with what is customary in the country concerned. We review expense claims for professionalism and frugality.

Conflict of interest

At Royal FloraHolland, we take decisions in a professional manner. Business and private interests are transparent in this respect and kept strictly separate. To prevent (apparent) conflicts of interest between work and private life, the employee and/or third party involved does not participate in the decision-making process. This applies to collaborating with suppliers, growers and customers are concerned, but also to contracting new employees or hiring employees and contractors externally.



“

I often come into contact with suppliers, growers and customers. I'm always alert and handle matters relating to corporate gifts and invitations with due diligence.

Outside work, I'm chair of a sports club. I discussed this with my manager.

”

Workplace relationships

A relationship in the workplace can cause major problems due to, for example, negative perception or apparent unequal treatment. In addition, a relationship can end unpleasantly, which can have a negative impact on the work environment. For this reason, we apply the principle that you should always report a relationship in the workplace so that a check can be made to ensure that there is no conflict of interest whatsoever.

Paid and unpaid ancillary positions

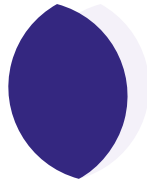
Paid and unpaid ancillary positions that conflict with the interests of Royal FloraHolland or with the Dutch Working Hours Act are not permitted. For that reason, employees always request prior written consent from their manager. If consent is given, the information is recorded in the personnel file.





This is what we stand for:

- We work with **reliable partners**.
- We abide by the rules regarding **corporate gifts**.
- We keep our **work and private interests** separate.
- We report unacceptable conduct immediately.



What we don't do:

- We do not allow ourselves to be influenced by accepting money or gifts.

4. Working safely

At the end of each working day, we want everybody to return home safe and healthy. For this reason, we work together with employees, third parties hired in and other users of the marketplace on a safe working environment. Achieving a safe working environment requires clear safety rules, which apply to everyone who works at or makes use of the marketplace.

Safety rules

Safety always comes before productivity. Time or work pressure may never be an excuse to work unsafely. We follow the [safety rules](#), and always use the prescribed personal protective equipment.

Traffic rules

At Royal FloraHolland locations and in the building, we adhere to the Dutch Road Traffic Act. We also have traffic regulations in place so that logistic supplies are driven safely. The traffic rules apply to everyone: drivers, cyclists and pedestrians. We take into account the packaging configuration, traffic situation and conditions at our locations. If necessary, we adjust our driving style

accordingly. We keep to the speed limit and maintain sufficient distance. We don't make calls unless really necessary for work.

In that case, we stop or call hands-free. We keep roadways free from obstruction to prevent unsafe situations.

Personal protective equipment

We wear personal protective equipment, such as safety shoes and high-visibility clothing, in all logistics areas.

Safe and tidy working environment

To prevent accidents, we create a safe and tidy working environment. We tidy up materials and tools immediately. We return clean auction trolleys.

Work permits

We only carry out hazardous work if we have a work permit for this. We take appropriate measures to prevent or limit risks.

“

My colleagues and I always follow the safety rules. We call each other to account if we observe unsafe conduct. In this way, we ensure that everybody goes home safe and healthy at the end of each working day ”

**Our safety rules
apply to everyone
in the marketplace.**





Children

Our logistics areas present inherent safety risks. Children under the age of 14 are therefore not permitted in the logistics areas.

Alcohol and Drugs

Being under the influence of alcohol or drugs, does not go hand in hand with working safely. People are unnecessarily endangered by this. For that reason, a Zero Tolerance policy applies. It is not permitted to possess or be under the influence of alcohol or drugs. The use of medicines that affect driving or behaviour at work must be reported to the manager and the Occupational Health and Safety Service.

Smoking

Smoking is not allowed in Royal FloraHolland buildings. Smoking outside the buildings at the Royal FloraHolland location is only allowed in the designated smoking areas. The same rules apply to e-cigarettes (vaping).

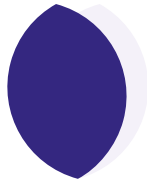
Calling each other to account about safety

At Royal FloraHolland, we're working together towards a good safety culture. We address each other respectfully if the safety rules are not observed. At Royal FloraHolland, we accept feedback from each other on unsafe behaviour.



This is what we stand for:

- We obey the **traffic rules**.
- We wear **safety shoes** and **high-visibility clothing** in the logistics areas.
- We keep our **work environment** tidy and safe.
- We hold each other accountable for unsafe behaviour and accept **feedback**.
- We only carry out hazardous work if a **work permit** has been issued.
- We report unacceptable conduct immediately.



What we don't do:

- We do not work under the influence of alcohol or drugs.
- We do not bring children under the age of 14 into the logistics areas.
- We do not smoke in the buildings.

5. Protection of information

Royal FloraHolland requires lots of different types of information to do its work properly. We're always careful when handling personal, confidential and secret information, such as company information, commercially-sensitive information and privacy-sensitive information. We do everything we can to protect this information.

Handling information

Sensitive information is divided into categories. These categories indicate what information we can and cannot share, and how we protect this information. We work under the following principles when dealing with sensitive information:

- we're aware of what information we may share;
- we protect sensitive information from unauthorised access;
- we process and share sensitive information only if this is allowed in accordance with our policy and is approved;

- we always send sensitive information securely;
- we destroy company information when it no longer needs to be retained;
- we handle our business resources, the internet and electronic communications with care.

Company information

We treat sensitive company information about Royal FloraHolland confidentially. This includes information about our activities, goals, products and services, as well as supplier contracts, marketing and business strategies, intellectual property and customer data.

Commercially sensitive information

We deal with commercially sensitive information in accordance with the Dutch Competition Act and handle it responsibly. Commercially sensitive information is taken to mean information that can influence competition and the market. This information could be about Royal FloraHolland or about other users of the marketplace.



“

I see a lot of personal information from our employees pass by every day. In our team, we regularly discuss the challenges we face to protect this information from unauthorised access.

”

Privacy-sensitive information

Royal FloraHolland protects the privacy and security of the personal data of its employees, third parties hired in and other users of the marketplace. We do this in accordance with the guidelines of the privacy law. We only use personal data to the extent permitted by law. Before distributing or publishing recordings of sounds or images of employees, third parties hired in and other users of the marketplace, we always first request written consent from those concerned.

We report any suspicion of an issue with data security and a possible data breach to the Privacy Officer (meldpuntdatalekken@royalfloraholland.com). This officer can then take or have taken appropriate measures, and, if necessary, report the circumstance to the Dutch Data Protection Authority.

Responsible use of company resources

We are careful with the internet and electronic communications. Business emails are sent and received only via the Royal FloraHolland email account. We are alert when receiving emails and visiting websites. We do not download, open or respond to suspicious emails and attachments. Suspicious attachments and spam are reported directly to the ICT service desk.

We only visit work-related websites and do not visit degrading, offensive, gambling or illegal websites. We also don't share or show images that can be perceived as offensive.

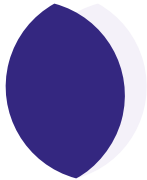
External communication

Only a limited number of employees have permission to speak to the media and other external parties on behalf of Royal FloraHolland. Under no circumstances should an employee speak to the press in terms of content. In this context, we refer to the press spokesperson: pers@royalfloraholland.com.



This is what we stand for:

- We handle **information** carefully.
- We **protect** confidential and classified information.
- We report any **breaches of data or information** immediately.
- We only use our Royal FloraHolland **email account** for business emails.
- We always ask for consent to distribute or publish **images**.



What we don't do:

- We do not respond to suspicious e-mails or social media posts.
- We do not download unsafe software on our devices.
- We do not share, disseminate or publish any sensitive information.

6. Working sustainably

Royal FloraHolland is working to build a strong floriculture industry that is prepared for the future. We do that, among other ways, by encouraging innovation. We are continuously looking for new and sustainable solutions. We involve employees, third parties hired in and other users of the marketplace in this objective. They have extensive knowledge and ideas. In doing so, we focus on three areas: having the least possible environmental impact and managing our cooperative well in terms of sustainability.



Sustainability within our company and in the chain

Examples of how we put this into practice: we continuously look at how we can reduce CO2 emissions, we limit the use of energy and raw materials, and reuse or recycle as many raw materials as possible. We minimise waste flows and handle natural resources, such as water, economically. We encourage growers to provide insight into how they produce flowers and plants by maintaining an electronic record of what they consume (water, energy, fertiliser, crop protection products) and obtaining an environmental certificate. We have also shown our commitment to making certified purchasing by the trade the norm.

Contributing to sustainability

Employees and third parties hired in make an important contribution to sustainability. Examples include separating waste in the containers designed for the purpose, closing doors of cold stores properly, turning off the lights when leaving and only printing if it is really necessary. We also have a bicycle plan, energy-efficient pool cars and electric charging points in our car parks. As an employer, we encourage the use of online or phone conferencing to reduce commuting and business travel.

Stimulating sustainable employability

We encourage the sustainable participation of our employees. We believe in the importance of a good work-life balance. We provide support through training and we consider vitality important; it means we can continue to participate sustainably within our organisation both now and in the future.

Sustainability is in all our interests. We have to cultivate a sustainable future together.

If you have any ideas or tips on the subject, please let us know via sustainability@royalfloraholland.com.



“

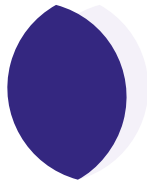
Royal FloraHolland believes that personal development and growth are important. For example, I took a course, which has benefited my work greatly.

”



This is what we stand for:

- We treat **people and the environment** with respect.
- We encourage **self-development** and facilitate **growth opportunities**.
- We report unacceptable conduct immediately.



What we don't do:

- We do not drive unnecessarily.
- We do not print an unnecessary amount of documents.

7. Compliance

Royal FloraHolland is obliged by law to draw up a binding Code of Conduct on our working practices and maintaining good order in the workplace. The Code of Conduct is a framework for underlying policy documents and protocols. The obligations in our collective labour agreement are also in force.

We encourage employees, third parties hired in and other users of the marketplace to discuss and report possible violations of this Code of Conduct. If the Code of Conduct is violated, there may be consequences on the grounds of employment law or even criminal law. If an employee or third party hired in fails to comply with the Code of Conduct, disciplinary measures may follow. Serious offences and criminal offences are reported to the police.

We expect other users of our marketplace to adhere to this Code of Conduct when at Royal FloraHolland locations. Violations may lead to sanctions. In serious cases, those who violate the Code of Conduct may no longer be allowed at our locations



“

I feel confident enough to call others to account about their conduct. I know that I can contact the confidential counsellor or SpeakUp hotline if I see something that I'd rather not share with my manager. It's good that measures are taken in response to undesirable behaviour.

”

Exemplary behaviour

Managers set a good example and ensure a transparent, clean and safe (work) environment. Employees and third parties hired in also behave correctly towards others. Employees and third parties hired in can always express their concerns with their immediate managers or senior management.

Managers as the first point of contact

We encourage employees and third parties hired in to report undesirable behaviour to their manager, who can look for a solution with the support of HR.

Confidential adviser

The Royal FloraHolland confidential adviser assists employees in the event of undesirable behaviour in the workplace. An employee can talk to the manager in the presence of the confidential adviser. Even if an employee cannot or does not want to go to the manager, the confidential adviser will assist the employee and look for a solution.

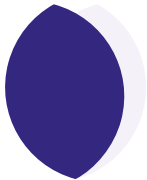
Anonymous reports

Employees and third parties hired in can also report actual or suspected serious violations of laws and regulations regulations and undesirable behaviour anonymously. Their name or position is not known in that case. At Royal FloraHolland, this goes through an external company: the SpeakUp line. An anonymous report can be made by sending a message or calling SpeakUp. SpeakUp sends a report to the Royal FloraHolland Compliance Officer. The content of the report will then be investigated in consultation with the manager of the relevant department and, if necessary, HR.



This is what we stand for:

- We take reports **seriously**.
- We take **action** if behaviour violates our Code of Conduct.
- We report unacceptable conduct immediately.



What we don't do:

- We do not try to solve large-scale or serious violations, such as fraud, theft and fraud, ourselves.

Appendix 1

more information

The documents below cover key policies in force within Royal FloraHolland. The complete, current, and prevailing internal policy can be found on the intranet under the Business Policy Framework.

1. Our core values

- Core values

2. Good conduct

- [Auction Regulations](#)
- Absenteeism rules
- Screening Policy
- Undesirable behaviour policy
- Workplace & telephony policy

3. Honesty in business

- Expense claims policy

4. Working safely

- Policy Frameworks & Regulations on Company Clothing and Personal Protective Equipment
- Alcohol & Drugs Protocol
- Smoking policy

5. Protection of information

- Social media policy
- Privacy policy

6. Working sustainably

7. Compliance

- Enforcement and sanctions policy
- Guidelines for taking a disciplinary measure
- Collective labour agreement
- Reporting procedure for wrongdoing

Appendix 2:

Reporting undesirable behaviour

Employees and third parties hired in

The immediate manager is always the first point of contact. If that doesn't work out, you can also report this to a senior manager or the HR adviser for your department. If you cannot or do not want to do this via your manager, senior manager or an HR adviser, then you can get in touch:

- with a confidential adviser;
- anonymously with Compliance via SpeakUp, this is possible over the phone (0800 0222931) or online (www.speakupfeedback.eu/web/p4umuf/nl) with access code 86844.

Other marketplace users

Are you a supplier, grower, customer or another user of our marketplace? You may report undesirable behaviour in the following ways:

- to your client;
- to your account manager;
- to customer service (+31 (0)88 789 8989).



Appendix 3:

Reporting undesirable behaviour.

We are jointly responsible for creating a safe working environment. There is no room for undesirable behaviour. Undesirable behaviour arises if someone does, says or writes something that someone else finds unpleasant. This includes actions such as aggression, bullying, discriminatory behaviour and sexual or other types of intimidation of colleagues or others in the marketplace. Actual or suspected theft or fraud is also undesirable behaviour. If you come across this or suspect it's occurring, please report it. Check the flowchart to find where you can make a report.

I want to share my concerns about unwanted behaviour. Where can I go?

Do you feel you have the courage to speak to the person concerned about his/her behaviour?

YES

Discuss it with the person and also report it to your manager.

No

Do you want to talk about it with your manager, another manager or HR advisor?

YES

Together with the manager or HR advisor you discuss the situation and approach.

No

Do you want to report it to a confidential advisor?

YES

The confidant will look for a solution together with you. He/she advises and informs you about the approach.

No

Do you want the report to be completely anonymous?

YES

This can be done via an external SpeakUp system: +31 (0)800-02 22 931 or www.speakupfeedback.eu/web/p4umuf/nl. Access code 86844.

The Compliance Officer investigates the report and acts carefully. Persons who are investigated as a result of the report will be informed of this. Do you have questions about the code of conduct, the schedule or the SpeakUp system? Check the intranet or mail to **compliance@royalfloraholland.com**.



CONNECT TO GROW

