

TRANSPARENCY REGULATIONS SUSTAINABILITY:

Regulations on transparency and assurance of sustainability through certification and controls.

Version April 2026

These Transparency Regulations Sustainability have been adopted by the Management Board of Royal FloraHolland and apply to all members, non-member suppliers and guest members who trade and settle via the Royal FloraHolland platform.

The applicability of these regulations stems from the relevant management decisions and is also laid down in the Auction Regulations, together with the other supply regulations (such as, for example, supply times, quality, sorting) in Chapter 2, Article 7: Registration of sellers and supply of products.

Note: Certification relates solely to providing transparency on the certificates obtained. The certificates merely confirm that an audit has established that the requirements set out in the relevant schemes have been met. The certificates are thus proof of conformity with the standard/requirement, but do not in themselves provide an assessment of a company's sustainability performance. Therefore, no broader sustainability qualification can be derived or awarded based on the certificates obtained.

CERTIFICATION

These Transparency Regulations Sustainability have been updated based on the executive order of 26 March 2026. This version, as published on the Royal FloraHolland website as at 30 March 2026, is the only version in force. All previously published versions of the transparency regulations sustainability on certification are hereby superseded.

Below is the decree that applies to all members, all non-member suppliers and guest members who trade and settle through Royal FloraHolland's platform.

Decision on certification policy of RFH

Principles of the certification policy:

- Certification and clear and transparent demonstration of how flowers and plants have been produced by growers is a fundamental part of RFH's access policy, both for members and guest members and non-member suppliers. The certification policy applies to all growers (members, non-member suppliers and guest members) and non-grower suppliers who trade and settle over the RFH platform (direct and auction).
- Certification is already anchored in the Transparency Regulations Sustainability belonging to the Auction Regulations and therefore applies to all growers supplying into the RFH platform. Some form of certification will also become mandatory for non-grower suppliers of ornamental plants or flowers (flowers, houseplants and garden plants).
- The Floriculture Sustainability Initiative (FSI¹)-basket of standards are the starting point. This means that in addition to environmental certification, GAP certification and — when applicable — Social certification² are also required.
- In FSI context, a small-scale grower certification has been developed specifically for small-scale growers in the Global North (mainly Europe and Israel). Growers with a total annual business

¹ FSI stands for Floriculture Sustainability Initiative: [FSI 2030 — Floriculture Sustainability Initiative/](#)

² The social certificate is not currently mandatory with FSI for growers from so-called "non-risk countries". However, FSI is planning to include social requirements for "non-risk countries" too (e.g. by means of social certificates). So social requirements will apply to all growers in due course.

turnover of less than €250,000 from ornamental plants or flowers can use the small-scale grower certification.

- We match the certification policy and implementation programme with the member packages.

The certification policy

- Compliance with the certification policy is a prerequisite for trading and settlement on the RFH platform (auction and direct). The RFH route is full certification according to FSI requirements aimed at transparency and assurance in the supply chain. For members, non-members and guest members who do not want to or cannot comply with the certification requirements, RFH offers additional support and an alternative interim solution with adjusted levies and controls. Non-(fully) certified users may continue to operate through RFH, but adjusted levies and (additional) controls apply to this group, such as additional residue measurements (see “enforcement”).
- All members with the Direct Focus, Direct Flex, Auction Flex packages and all non-member suppliers must demonstrate compliance with the applicable FSI-Basket or Standards certification requirements by 1/1/26. These FSI certification requirements entail an Environmental Certificate, a GAP Certificate, and — where applicable — a Social certificate.
- Members who opt for the Auction Focus package will get more time and can also trade on the RFH platform without a certificate at least until 1/7/27. From 1/7/2027, all members in the Auction Focus package must be fully certified according to FSI requirements. Small-scale growers - provided they demonstrably, based on their entire business size, meet the conditions set by FSI for small-scale growers (total annual business turnover from ornamental plants or flowers < €250,000) can take advantage of one of the 2 small-scale grower certification schemes offered.
- Member growers with Auction Focus package who do not meet the conditions for small-scale growers will have to meet the same conditions that apply to packages Direct Focus, Direct Flex, Auction Flex from 1/7/2027.
- Small-scale non-member suppliers and small-scale member growers who have opted for the Direct Focus, Direct Flex, Auction Flex packages can also use the small-scale grower certification if they so wish, provided they can demonstrate — based on their entire business size — that they meet the conditions set by FSI for small-scale growers (total annual business turnover from ornamental plants or flowers < €250,000).
- Small-scale member growers with Auction Focus package receive (group) support organised by RFH. Support is also organised for large-scale growers.
- Small-scale Auction Focus growers (member of RFH, total annual business turnover from ornamental plants or flowers < €250,000) will receive a one-off payment of €250 until 1 July 2027 if they demonstrably meet FSI requirements.
- The certification policy also applies to guest members of Plantion (see under “Plantion growers supplying RFH as guest members”)

The small-scale grower certification

- The small-scale grower certification was developed in FSI context, specifically for small-scale growers in the Global North (mainly Europe and Israel). Growers with a total annual business turnover of less than €250,000 from ornamental plants or flowers can use the small-scale grower certification.

Note: Anticipating future developments, a simplified social module has already been included in the small-scale grower certification. This social module in the small-scale grower certification is not yet mandatory and will not be audited until further notice. Therefore, until further notice: a grower participating in the small-scale grower certification scheme meets FSI requirements when both the GAP module and the Environment module have been successfully audited according to the scheme's criteria. Social certification will also become mandatory for 'non-risk countries' (Global North) in due course. This will be further elaborated in the FSI context. After the requirement of social certification in the 'non-risk countries' (Global North) comes into effect, all audits under the small-scale grower certification will include the social module, and a successful audit of the social module — in addition to the Environmental and GAP modules — will help determine whether the FSI requirements are fully met.

Enforcement, compliance and charges - General

- Certification is anchored in the Transparency Regulations Sustainability pertaining to the auction regulations and applies to all member growers, non-member suppliers and guest members (of Plantion) who trade and settle on the RFH platform.
- The RFH policy remains focused on transparency and assurance in the chain based on full certification according to the FSI requirements. For members, non-members and guest members who are unwilling or unable to comply with the certification requirements, RFH offers additional support and an alternative interim solution with adjusted levies and controls, so that transparency is still obtained (after the event). Non-certified users may continue to operate through RFH, but adjusted levies and (additional) controls apply to this group, such as additional residue measurements (see “enforcement”).
- As part of enforcement, monthly levies will be imposed on growers who fail, in whole or in part, to comply with FSI's requirements for certificates in the 3 scopes (pillars) of the FSI basket of standards³.
- The levy is calculated monthly and imposed per missing certificate. At the beginning of each new month, it is determined which certificates a grower has obtained. For each missing certificate, a levy is subsequently imposed on the turnover of the previous month.
- The levies for non-(fully)-certified users are used to cover the additional costs of organisation and additional controls in the form of residue monitoring, additional administrative work, risk management, required support, hiring independent expertise, additional communication capacity and reputation management.
- As long as the obligation on the social certificate is not yet in place for the “non-risk” countries, growers in the non-risk countries are subject to compliance with both the Environmental and GAP pillars. Once the Social certificate obligation also applies to non-risk countries, the social pillar will be added and enforced, and the same approach as for the other pillars will otherwise apply.

³ The social certificate is not currently mandatory with FSI for growers from so-called “non-risk countries”. Therefore, in the “non-risk countries” no levy will be imposed now in the absence of a Social certificate until further notice. However, FSI is planning to include social requirements for “non-risk countries” too (e.g. by means of Social certificates). Also, for participants in the Small-scale Grower Scheme, the social module is not mandatory until further notice at present and is therefore not audited. In due course, social requirements will apply to all growers.

- Even if a small-scale grower has not obtained one or more certificates, a levy for each missing pillar will be levied monthly on the turnover (in line with the above), at least for the environmental pillar and the GAP pillar, and once the obligation on the Social certificate is in force for the so-called “non-risk countries”, also for the social pillar. If a grower has obtained the small-scale grower certificate (based on a successfully completed audit), he/she immediately meets FSI requirements based on all FSI pillars then in force.
- The management board reserves the right to change the amount of the levy and the method of levying it.
- The management board of RFH reserves the right to take further measures when necessary, in the interest of the cooperative. The management board will closely monitor the progress of certification.

Enforcement, compliance and levies – basis for levies; basis for levies for the various grower groups: in the event of not being (fully) certified in accordance with FSI requirements

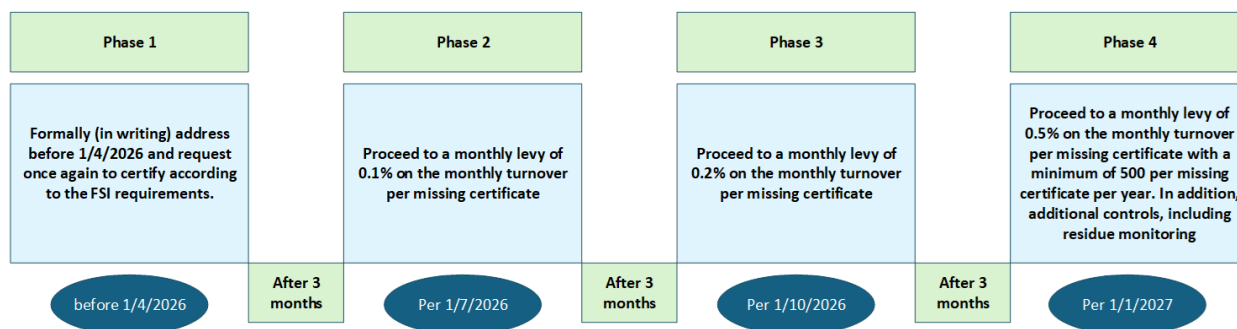
- **RFH members who trade exclusively via RFH:** RFH members are subject to an obligation to list; all members must list their entire stock on the RFH platform/Floriday. In addition, there is an obligation to settle accounts; all members must settle their entire product revenues via RFH and the certificates cover all products offered by the entire member company. Member-suppliers who trade exclusively on the RFH platform pay a levy on their product revenues to RFH.
- **RFH members who trade via RFH and via third parties, e.g. other auctions or NAT (“Non-auction turnover (NAT)”):** If you are a member of RFH, you have an obligation to list your stock; all members must list their entire stock on the RFH platform/Floriday. In addition, there is an obligation to settle accounts; all members must settle their entire product revenues via RFH and the certificates relate to all products offered by the entire member company. For member-suppliers who trade on the RFH platform but also trade with third parties, such as at other auctions and/or have other NAT product revenues, the basis for the levy is the total product revenues from floriculture products. When determining the levy, product revenues from third parties, e.g. other auctions and/or other NAT product revenues, are also included in the levy base.
- **Non-auction turnover (NAT):** As mentioned above, for RFH members, NAT product revenues are also included in the levy base; therefore, a levy is also applied to NAT product revenues if an RFH member does not (fully) meet the FSI certification requirements. Members are subject to a general obligation to pay, and the certificates cover all products offered by the entire member company. On the NAT reference date (after each year), it is determined whether the grower in question is (fully) certified in accordance with the FSI requirements. If not, a retrospective levy will be imposed on the NAT product revenues for the previous year. RFH reserves the right to make further adjustments at a later date, based on new or additional NAT information obtained.
- **Non-member suppliers to RFH:** non-member suppliers to RFH who are not (fully) certified in accordance with the FSI requirements pay a levy on their product revenues with RFH. RFH agrees with non-member suppliers which part of their product revenues is channelled through RFH. The obligation to offer goods therefore applies to that part. Although RFH has no control over trade between non-member suppliers and third parties, RFH requires that non-member suppliers also have their entire business certified in accordance with FSI requirements. In the event of ‘persistent uncertified trade with third parties (outside RFH)’, RFH reserves the right to terminate the contractual relationship with the non-member supplier.
- **Guest members of Plantion.** Guest members of Plantion who are not (fully) certified in accordance with the FSI requirements pay a levy on product revenues to RFH.

- **Product revenues under the Grower-Grower Scheme:** Product revenues under the Grower-Grower Scheme are also included, alongside product revenues from the Auction and Direct sales, when calculating the levy base.

Enforcement, compliance and levies — regarding Member growers with Direct Focus, Direct Flex, Auction Flex packages, all non-member suppliers and "larger" guest member suppliers of Plantion.

- Effective date of certification timeline 1/1/2026: all members in the Direct Flex, Direct Focus, and Auction Flex member packages, all non-members, and the "larger" guest members of Plantion are certified as per FSI requirements. Growers with a total business turnover from ornamental plants or flowers < €250,000 can use the small-scale grower certification.
- Enforcement has been tightened.
- The stages for enforcement and compliance for not having the required certificates on time are:
 - As of 1/7/2026, a monthly levy of 0.1% per missing certificate on the monthly turnover will commence.
 - As of 1/10/2026, this levy will be doubled to 0.2% per missing certificate.
 - As of 1/1/2027, a levy of 0.5% per missing certificate with a minimum of €500 per certificate per year will apply and there will be (additional) controls such as additional residue measurements.
 - A Social certificate already applies to the so-called "risk countries"; for the "non-risk countries", when the Social certificate becomes applicable to them, RFH will follow the same approach as for the other certificates/pillars.

The 4 phases of enforcement Direct Focus, Direct Flex, Klok Flex, non-members and "larger" guest members of Plantion

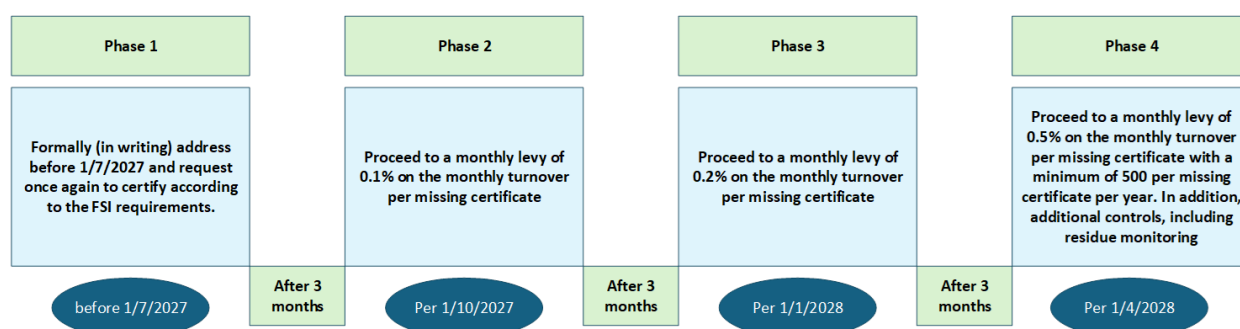


Enforcement, compliance and levies — regarding Member growers with package Auction Focus and small-scale growers of Plantion

- **Auction Focus:** effective date of certification timeline 1/7/2027: all members in membership package Auction Focus and small-scale guest members of Plantion are fully certified according to FSI requirements. Growers with a total business turnover from ornamental plants or flowers < €250,000 can use the small-scale grower certification.
- Enforcement has been tightened.

- The stages for enforcement and compliance for not having the required certificates on time are:
 - As of 1/10/2027, a monthly levy of 0.1% per missing certificate on the monthly turnover will commence.
 - As of 1/1/2028, this monthly levy will be doubled to 0.2% per missing certificate.
 - As of 1 April 2028, a monthly levy of 0.5% per missing certificate with a minimum of €500 per certificate per year will apply and there will be (additional) controls such as additional residue measurements.
 - A Social certificate already applies to the so-called “risk countries”; for the “non-risk countries”, when the Social certificate becomes applicable to them, RFH will follow the same approach as for the other certificates/pillars.

The 4 phases of enforcement of the Klok Focus package (and small-scale guest members Plantion)



Additional controls in the form of residue monitoring:

Correct crop protection product use is an urgent and important issue in international floriculture, which is important for the raison d'être and reputation of RFH and the floriculture industry (transparent and clear). RFH will carry out (additional) checks including residue measurements as part of transparency and certainty on correct crop protection product use. Growers and suppliers of RFH are expected to cooperate with this, in accordance with the articles of association, with immediate effect.

These residue measurements can be divided into 2 types:

- **General residue monitoring:** For all growers/suppliers trading and settling on the RFH platform, both certified and non-certified, RFH has random residue measurements and monitoring carried out for the benefit of the sector's reputation and to gain a better and broader insight into the use of crop protection product use. General residue monitoring will start during 2026.
- **Residue measurements among the group of growers/suppliers** who are not (fully) certified: For growers/suppliers who are not (fully) certified according to FSI requirements, an additional, more intensive compliance check applies: part of this consists of unannounced residue measurements to ensure transparency regarding the most important risks concerning the correct use of crop protection product use.
- The policy and procedure regarding residue monitoring are still being developed. Communication will take place at a later date.

Other topics; other matters relating to implementation and enforcement

- Temporarily not certified

To businesses whose MPS ABC certificate or GLOBALG.A.P. IDA certificate is temporarily suspended (so-called MPS NQ status/IDA NC status), e.g. due to the grower's culpable failure to

submit digital environmental records on time, a levy will not be imposed immediately. However, these businesses will be challenged to take prompt corrective action.

A business holding NC/NQ status for more than one quarter will receive a levy under the regular procedure.

- **Grower organisations (and other forms of grower collectives)**

The certification requirement also applies to grower associations and all growers trading on the RFH platform through a grower association or other form of collectivity. If one of the growers acting through a grower organisation is not or not fully certified, the relevant grower and the grower organisation (or other form of collectivity) will be contacted.

The management board reserves the right to define appropriate (tailor-made) measures for grower organisations (and other forms of grower collectives) if circumstances based on advancing insight so require.

- **Showing certificate status**

To strengthen transparency, we will continue to show explicitly on the auction and on Floriday which certifications a grower has achieved and continue to show in words or through logos whether the grower meets FSI requirements.

- **New members, new non-member suppliers and new guest members**

New members and new non-member suppliers (and new guest members) are required to meet the same certification requirements applicable to members and non-member suppliers with the corresponding ground rules within one year of registration.

Not yet certified new members and new non-member suppliers (and new guest members) of RFH will be on the exception list for the first year and will be given one year to meet the required certifications. This is because a grower needs one year from the time of application to receiving required certificate/certificates.

After the first year, new growers will be subject to the same enforcement measures as all growers.

- **Non-grower suppliers**

RFH wants to move towards fully certified supply according to FSI requirements. However, RFH suppliers include those who do not grow their own, but supply products produced by others (or are non-livestock products). To ensure that all products traded on our platform come from certified businesses, we ask non-cultivating suppliers who trade live products (flowers, plants) on the RFH platform to obtain a certificate to be able to trace the origin of products (non-cultivating supplier certification).

In the floriculture industry, there are now two possible traceability certificates for this:

- Florimark TraceCert from MPS
- GLOBALG.A.P. Chain of Custody (CoC).

Both certificates ensure traceability of products, but not necessarily that all supplies are actually certified.

Therefore, in time, we will also make it compulsory for non-cultivating suppliers to be verifiably transparent about the origin and certification status of the products they offer and to communicate the certification status per batch offered.

The implementation deadline for this is 1/7/2027. This means that by 1/7/2027, non-cultivating suppliers must hold an MPS TraceCert or a GLOBALG.A.P Chain of Custody certificate and must

cooperate in communicating the origin and certification status of the products offered on a batch-by-batch basis from this date.

From 1/7/2027, enforcement will take place with regard to non-cultivating suppliers. The exact method of enforcement/levying will be communicated later.

So-called "hardware traders", who trade non-live products on the RFH platform are excluded from certification.

- **Deregistrations ("exit scheme")**

This scheme is aimed at growers who want to cease their business within 2 years of the effective date of their obligation to comply with FSI requirements.

These growers can apply for exemption themselves in writing if they simultaneously cancel their membership or supplier status no later than the aforementioned end date.

In that case, these growers will be given a temporary personal waiver which means they will not have to certify during the final period as a member or non-member supplier at RFH, nor will they receive any levies during this agreed period.

After the agreed period, the grower must then actually cease supplying RFH, i.e. also not supplying through another member/administration number.

This means that:

- member growers in the Direct Focus, Direct Flex, and Auction Flex packages, and non-member suppliers who must be certified as of January 1, 2026, can receive a personal temporary exemption until January 1, 2028. After that, they must cease their supply activities, and therefore also not deliver via another member/administration number.
- Auction focus growers who should be certified by 1/7/2027 must get a personal temporary exemption until 1/7/2029. After that, they must cease their supply activities, and therefore also not deliver via another member/administration number.

Note: non-certification on the basis of an exemption is at the applicant's own risk. RFH cannot be held liable if trading companies no longer purchase from these companies as part of 100% certified procurement.

- **Organic (EU Organic/Skal)**

RFH wants to encourage organic cultivation with these certificates and will therefore accept growers with EU Organic/Skal certificates or growers transitioning to them for the time being, until these certificates are eventually integrated into the FSI system.

- **Delivery to third parties**

These Transparency Regulations Sustainability oversee the certification requirement as part of the business operations of member and non-member suppliers. They are therefore expected as a company to comply integrally and at all times with these Sustainability Transparency Regulations. For members, this also means that these regulations also apply when supplying third parties. **See Enforcement, compliance and levies – basis for levies.**

- **Plantion growers leading as guest members at RFH:**

Plantion and RFH together are the two members of the VBN. RFH and Plantion have reached agreements on certification and are willing to cooperate in VBN on certification (using RFH's sustainability requirements as a basis) — in the interest of a joint sector transition.

RFH's policy on certification is laid down in these Transparency Regulations Sustainability (March 2026 version), which are part of RFH's Auction Regulations and are therefore applicable to all members, guest members and non-member suppliers of RFH.

In the spirit of the transition on certification and RFH's Sustainability Transparency Regulations, Plantion's small-scale growers who enter RFH as guest members (i.e. who meet the FSI admission criteria of the small-scale growers scheme, viz. total annual turnover from ornamental plant production < €250k) will be treated as RFH members with Auction-Focus package in terms of timing. This will allow small-scale Plantion growers as guest members to trade at RFH without certificates at least until 1/7/27. By 1/7/2027, small-scale Plantion growers supplying RFH as guest members must be fully certified according to FSI requirements. This means they will have to demonstrate — on the basis of a successful audit — compliance with the applicable FSI-Basket of Standards certification requirements, for example by using one of the 2 small-scale grower certification schemes offered.

“Larger” Plantion growers who enter RFH as guest members — who therefore do not meet the FSI definition of small-scale growers — must demonstrably meet the applicable FSI-Basket of Standards certification requirements by 1/1/26. These FSI certification requirements entail an Environmental Certificate, a GAP Certificate, and — when applicable — a Social certificate.

RFH and Plantion will also comply and enforce this policy. RFH's approach to compliance and enforcement for not having the required certificates on time also applies to Plantion growers who supply RFH as guest members.