

**Ethical business principles**

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## **Code of conduct**

### **1. General business principles**

Our general business principles shape our business decisions and activities. Vepo Cheese BV and all its staff undertake to conduct the company's business activities in full compliance with the legislation, rules and regulations and with respect for the culture of every country with which it does business.

The rules described in these business principles reflect our fundamental values and principles and are intended to help our staff to adhere to our code of conduct. These general business principles cannot provide ready-made solutions, but they show the direction we should be taking. The general business principles are not all-embracing, but set out minimum requirements.

Every employee of Vepo Cheese BV is responsible for upholding these standards and for carrying out our activities in a professional, safe, ethical and responsible way.

These business principles apply to all the business activities of Vepo Cheese BV. We also expect third parties who act as intermediaries or representatives of Vepo Cheese BV to adhere to our business principles whenever they are working for or on behalf of Vepo Cheese BV.

### **2. Compliance**

All staff of Vepo Cheese BV are responsible for complying with these general business principles. Violation of the general business principles may result in sanctions and/or disciplinary measures, including dismissal.

### **3. Reporting violations**

Vepo Cheese BV encourages its staff to report any suspected violation of these general business principles to their line manager, the head of P&O or management.

- When reporting a violation, the employee must be able to substantiate his or her assertions with sufficient facts to enable a thorough investigation to take place.
- The investigation will be carried out by or under the supervision of the Head of the P&O Department.
- Staff will not suffer any negative consequences as a result of reporting a suspected violation of the general business principles. All reports will be treated as confidential.
- The management has a duty to monitor compliance with the general business principles and to assist with investigations into violations.

## **Employees and work**

### **4. Equal opportunities policy for staff**

Vepo Cheese BV offers equal opportunities to everybody who holds the required qualifications and does not discriminate on the basis of race, gender, sexual orientation, age, social class, trade union membership, ethnic background or religion.

- We encourage and help our employees to acquire relevant skills, which will enhance their personal development.

### **5. Work**

All employees of Vepo Cheese BV work within the limits defined by law.

- Working hours and breaks.
- There is no forced labour or child labour within Vepo Cheese BV.
- Only legal, externally hired employees can work for the company.
- Remuneration is regulated by the collective agreement and lays the foundation for a fair and reasonable wage policy.

### **6. Freedom of assembly**

Vepo Cheese BV respects the right of employees to organise and to negotiate collectively.

### **7. Health and safety**

Vepo Cheese BV strives to create a working environment, which satisfies all the requirements relating to the health and safety of staff.

- Vepo Cheese BV is responsible for establishing rules and procedures to safeguard health and safety at the workplace, in compliance with the relevant legislation and regulations,
- because health and safety are essential prerequisites for good performance.
- Employees have a duty to know and observe the safety rules relating to their workplace.

### **8. Discrimination, intimidation and violence**

Vepo Cheese BV strives to create a working environment that is free from any form of discrimination, intimidation or violence.

- No form of discrimination, intimidation or violence is tolerated. This means actions, pranks, remarks or other spoken or written words which relate to the age, nationality, skin colour, gender, sexual orientation, religion, disability or chronic illness of a person with the aim of intimidating or insulting a person or in any other way harming the working environment.
- We do not tolerate any physical or psychological harassment or other offensive behaviour.

### **9. Use of drugs and alcohol**

Vepo Cheese BV does not tolerate the use of drugs and alcohol at the workplace.

- Vepo Cheese BV prohibits the possession or use of illegal drugs on company premises and during parties/events, which take place off company premises.

### **10. Protecting employees' personal information**

Vepo Cheese BV undertakes that it will not collect and store personal information unless it is required for the proper functioning of the company or prescribed by law. Access to this information is restricted to persons who are authorised to access it on behalf of the company in the course of their work.

### **11. Engagement of staff**

Staff are responsible for the careful use, protection and preservation of the property and assets of Vepo Cheese BV.

## **Business ethics**

### **12. Social media code of conduct**

All employees of Vepo Cheese BV must adhere to the company's social media code of conduct.

- Employees must be aware that they also have a relationship with Vepo Cheese BV when they are using online social networks. Employees must ensure that their profile and content on social media are compatible with the way they would present themselves in text, image and sound to colleagues and clients.
- Employees must be aware that everything they publish will be in the public domain for a long time.
- Employees must comply with the law relating to image rights, copyright and the right to quote.
- Employees must not pass on any confidential and/or harmful information about clients, colleagues or suppliers.
- Employees must respect the people they are addressing. Ethnic abuse, personal insults and obscenities are not permitted. The privacy of others must be respected.
- Employees must contact their line manager immediately if they have the slightest doubt about a publication or interfaces with Vepo Cheese BV.

### **13. Conflict of interests**

All employees of Vepo Cheese BV have a duty to avoid any situation, which represents a conflict of interest between their personal interests and those of the company or client.

- We ask our employees to inform us if they or any of their family members have financial interests in companies, which do business with Vepo Cheese BV.

### **14. Fair competition**

We work in an environment where trust is very important.

- We support the principle of free enterprise and fair competition as a basis for our activities and respect the applicable laws and regulations.
- The use of illegal or unethical means to gain a competitive advantage is not permitted.
- All information about our suppliers and customers is treated as confidential.

### **15. Accepting gifts, presents or other favours**

Gifts of any nature and presents, services or favours must never be given or received unless they fall within the normal context of a business transaction, have only a minimal or symbolic value and only occur occasionally.

- Gifts must be refused if their purpose is (clearly) to place the recipient under an obligation.
- Bribery of any kind is not acceptable. Bribery means offering or promising a payment or other benefit to a party with which Vepo Cheese BV does business or from which Vepo Cheese BV requests services.

### **16. Our products**

The quality and safety of our products are paramount and must never be put at risk.

- We never give inaccurate or misleading information about our products intentionally.

### **17. Accounts**

Full, accurate accounts must be kept, with due regard to the generally accepted accounting principles (GAAP).

- The company's independent auditors have access to all the information they require to enable them to carry out their audit.

### **18. Company documents**

Employees must comply with the relevant Vepo Cheese BV policies and applicable legislation relating to the management, storage, disposal and destruction of company documents.

### **19. Environment**

Vepo Cheese BV strives to carry out its activities in a way, which protects both the workplace and the environment. The management of Vepo Cheese BV is committed to using working methods, which conform to the regulations and procedures in force at the time.

### **20. Suppliers, subcontractors**

The Vepo Cheese BV sourcing policy is based on merit.

- Suppliers and subcontractors of Vepo Cheese BV are treated with fairness and integrity and without discrimination.
- The Vepo Cheese BV policy on conflicts of interest should be used as a guideline for employees who have dealings with suppliers.