



# VEPO CHEESE

The Dutch way to say cheese

## Code of Ethics

# Preface

The success of our company is not only measured in terms of financial numbers, but also in terms of the impact we have on our employees, customers, suppliers and our environment.

The very essence of who we are and what we strive for is set out in our Vepo Values. Our impact is determined by our interpretation of these values and we are jointly committed to this.

We always respect the laws and regulations of the countries in which we operate. That applies to us as a company and to you as an employee. But how do we work together and do business? We realise that such decisions are not always easy. Whether it is developing new products, entering into partnerships or dealing with challenges. This is why we have the Vepo Cheese Code of Ethics.

The Vepo Cheese Code of Ethics is a guide to working safely, responsibly and with integrity. It helps us ensure that everyone shares the same values and standards everywhere we operate. It also describes what behaviour we do not accept, how we deal with it and what you can do in the case of wrongdoing.

Together, we are making Vepo Cheese a success.

## **Vepo Cheese Management**

Mark Verkleij, Marlou Bink-Verkleij and Ed Brouwer



# For whom?

The Vepo Cheese Code of Ethics applies to everyone working at Vepo Cheese. Irrespective of whether you are employed by Vepo Cheese, hired externally or have contracted for work as a third party. The Vepo Cheese Supplier Code applies to suppliers and other business partners.

## What do we expect from you as an employee?

That you want to do the right thing and do it well! That you help uphold our values and standards. The Code of Ethics thereby forms the basis of everything we do.

## Managers

We expect employees in managerial positions to lead by example and to support their team in the case of doubt or ambiguity. Moreover, we want them to create an atmosphere in the department where employees feel confident that they can report unwanted situations without fear of consequences.

## But don't we already have internal company rules?

That is correct. The Code of Ethics forms the basis for the internal company rules and related procedures. These clarify what is expected in specific situations and are called our Code of Conduct. Is a situation not mentioned or described in the Vepo Cheese Code of Conduct? In that case, the Code of Ethics provides guidance and you can still make choices in line with our beliefs.



# Speak up!

What if you find yourself in a situation where another person is not acting according to our values and ethical principles? Do not look the other way; report it. Only then can we take action to ensure that the situation is resolved. Reporting requires courage on your part and diligence on our part. That is why we have the Whistleblower Scheme.

Employees can obviously also consult HR or the external confidential advisor first.

## How does a report proceed?

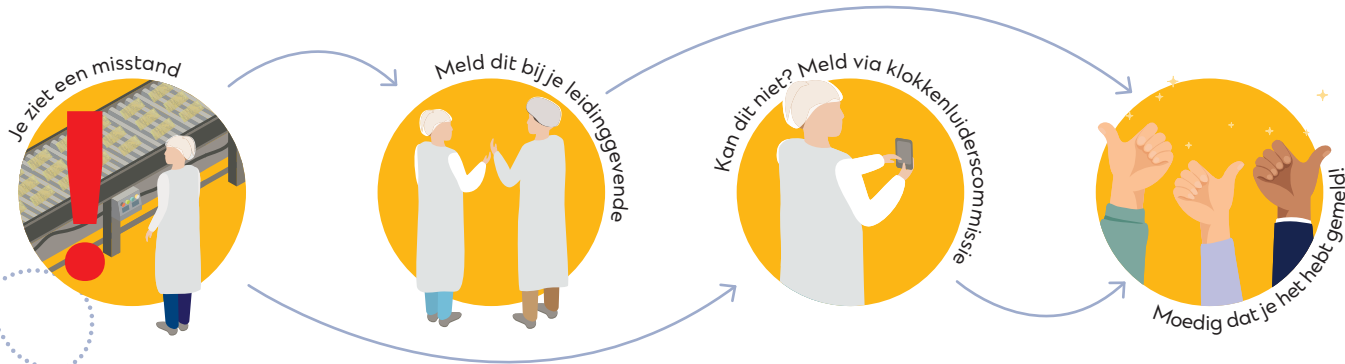
An employee initially reports wrongdoing to his/her manager. If the wrongdoing relates to his/her manager or if the employee believes that the manager has given an unsatisfactory response to the report, the employee may report the wrongdoing to the Whistleblowers' Committee. The report should

describe the wrongdoing in as much detail as possible. This report can be e-mailed in the native language of the employee to: [sos@vepocheese.com](mailto:sos@vepocheese.com) or posted to: Vepo Cheese NV, Attn. Whistleblowers' Committee, Beneluxweg 1, 2411 NG Bodegraven.

Every employee received a copy of the Whistleblower Scheme before commencing employment or the contracted work. Employees can also access the Whistleblower Scheme on Plek and everyone can request a copy from the HR department.

## Compliance and sanctions

Failure to comply with the Vepo Cheese Code of Ethics may result in appropriate measures being taken, including legal measures and termination of the employment relationship in extreme cases. The sanctions policy is described in the internal company rules.



# Vepo Values

The Vepo Values are those values that guide what we do:



## Reliability

We honour agreements and act with integrity.



## Continuity

We invest in long-term relationships with all our employees, customers and suppliers to ensure the continuation of our business.



## Entrepreneurship

We are ambitious, want to improve, take responsible risks and give our employees responsibility.



## Flexibility

We respond to our customers' needs and developments in the market. We are committed to serving the customer.

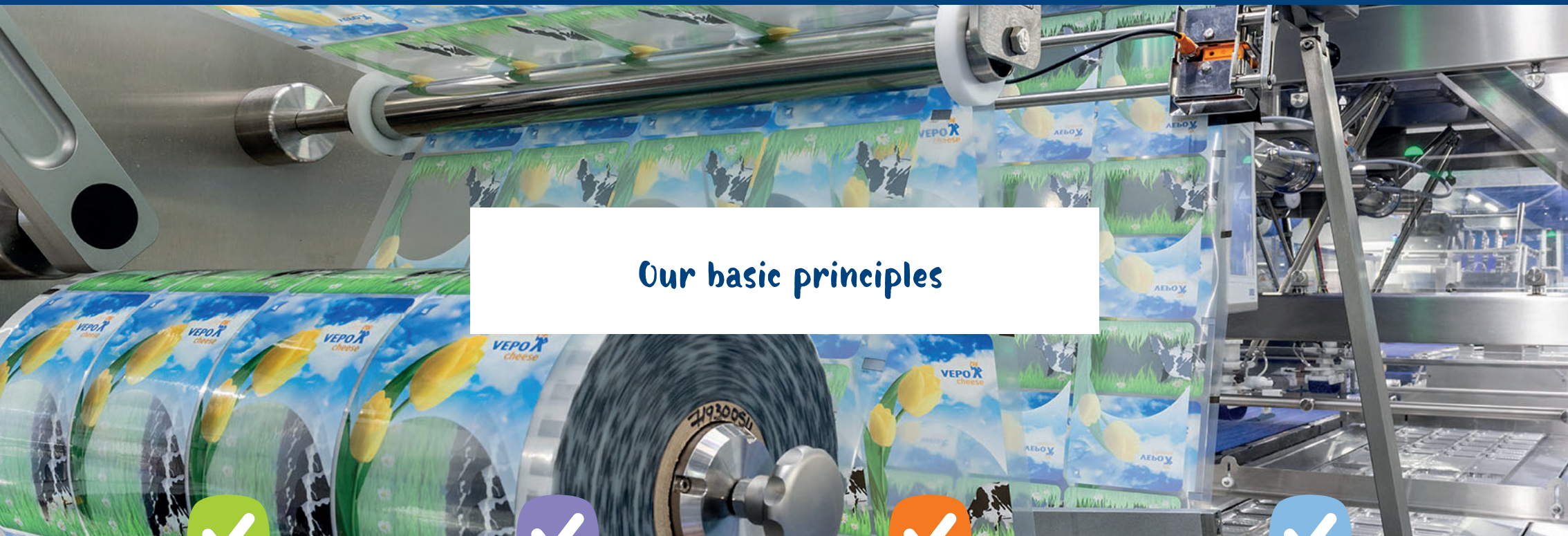


## Sustainability

We are always looking for new sustainability initiatives to reduce our impact on the climate and the environment.

How we do this, that is according to which principles and beliefs we conduct our business, is described in four basic principles.

# Basic principles



## Our basic principles



We put  
safety first



We have integrity  
in our work



We comply with laws  
and regulations



We take  
responsibility

# 1.

## We put safety first

We intentionally put safety first. The safety of our products, our employees and our partners must never be compromised. We are aware of the risks involved in working in a food-producing environment.

Our business operations are designed to ensure the safety of employees and products. We do this through rules, checks and awareness; because employees themselves also have an important role in preventing dangerous situations.



### Safety of our employees

All our employees must be able to perform their work in a safe and healthy manner. By means of rules and procedures, we want to provide a working environment for our employees that complies with all legal requirements regarding health and safety. This applies to both physical and psychosocial safety. We also provide instructions and training regarding safety regulations. An employee may not start work until he/she is familiar with the corresponding safety regulations. We encourage the reporting of unsafe situations, near misses and accidents. No employee is required to undertake a task if it is unsafe or frightening. The prevention officer is not attached to any department and is directly accountable to the management team in order to accomplish his/her task as independently as possible.



There is no place in our organisation for undesirable manners and/or inappropriate behaviour. This includes **discrimination, sexual harassment, bullying, aggression & violence**.

Discrimination will not be tolerated in any form whatsoever. This includes actions and expressions in word or writing that are related to the age, nationality, skin colour, gender, sexual orientation, religion, disability or chronic illness of a person, which have the aim of intimidating or insulting a person or otherwise negatively affecting the working environment. We will not tolerate sexual harassment, physical or mental bullying, verbal, psychological or physical violence or any other harmful behaviour.

We have adopted a policy in this regard which sets out the fundamentals of how we should behave at

Vepo Cheese and lists behaviours that will not be tolerated. It also describes how complaints and signals of undesirable behaviour are handled at our company.



### **Food safety**

We follow a quality system that defines our processes and procedures. This quality system is continuously monitored by the Food Safety Team. The Quality Assurance (QA) team implements improvements where necessary. QA is an independent and autonomous department functioning alongside operational departments that ensures that national and international laws and regulations are respected and complied with. The importance of food safety is addressed through training courses. We also test the knowledge gained from these training courses. We encourage employees to check products, execute processes properly and contribute ideas for improvements. External checks by the government, customers and certifying bodies demonstrate our compliance with all requirements to deliver high-quality and food-safe products.



# 2.

## We have integrity in our work



### **Information**

We never intentionally provide inaccurate or misleading information about our products. We address complaints about our products in a professional and fair manner. We encourage employees to speak up when they see wrongdoing or experience behaviour that is not in line with the Vepo Cheese Code of Ethics or the Vepo Cheese Code of Conduct.

### **Confidentiality of information**

Our employees protect confidential company information. This means that they may only share it with internal persons concerned and never with external parties, unless required by law or where this information is publicly available. This is necessary to ensure that our competitiveness is not compromised and to protect the privacy of our employees. Confidential information includes pricing information, supplier contracts, marketing and business strategies, intellectual property and employee, customer & supplier data.

### **Conflict of interest**

Employees should avoid situations that may constitute a conflict of interest between personal interests and

the interests of Vepo Cheese and/or the customer. Should such a situation arise, or the risk thereof, they should report it to their immediate manager.

### **Procurement**

Suppliers and subcontractors are treated fairly, with integrity and without any form of discrimination. Employees who have personal vested interests with suppliers should report this to their immediate manager.



### **Internet, e-mail & social media use**

Vepo Cheese provides employees with access to resources such as the internet, e-mail, computers, telephones, etc. so that everyone can perform their jobs to the best of their ability. We have drawn up conditions concerning the use of these resources and social media. These conditions also describe how Vepo Cheese handles the registration, collection and monitoring of personally identifiable data due to the use of hardware, software, e-mail and the internet.



### **Fair competition**

We work in an environment where trust plays a major role. We support the principles of free enterprise and fair competition as a fundamental basis for our business activities. The use of illegal or unethical methods to gain a competitive advantage will not be accepted.

### **Accepting gifts, gratuities or other favours**

Gifts in any form, gratuities, services or favours should never be given or received unless they fall within the normal scope of a business transaction and are of minimal or symbolic value and occur sporadically. Gifts should be refused if it is apparent that their intention is to impose an obligation on the recipient, to influence decisions or to gain an unfair advantage.

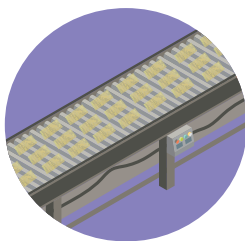


# 3.

We comply  
with laws and  
regulations

## Work

All Vepo Cheese employees work within the limits stipulated by law. Remuneration, working hours and rest periods, as stipulated by law and collective labour agreements (CAO), are respected and adhered to. There is no forced labour or child labour at Vepo Cheese. Only employees entitled to work and reside in the Netherlands may be employed or deployed. Vepo Cheese respects the right of employees to organise and engage in collective bargaining. Vepo Cheese respects and complies with applicable laws and regulations in the area of food safety.



## Administrative records

We maintain administrative records accurately and in compliance with applicable regulations. The independent auditors and accountants of Vepo Cheese have access to all information required to conduct their periodic audit.

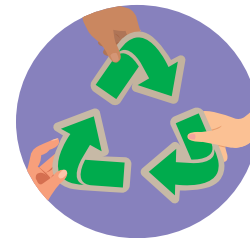
## Company documents

Business documents are managed, retained and destroyed in compliance with the relevant statutory

period. If we ask for proof of identity, this personal data will not be copied and kept in our records unless it concerns employees who enter into employment at Vepo Cheese. All data is subject to the relevant frameworks of the General Data Protection Regulation.

## Protection of personal data of employees

The collection and retention of personal data may only take place if this data is required for the proper functioning of the company or if required by law. Access to this information is only granted to employees who are authorised to do so on the basis of their work for the company, subject to the relevant frameworks of the General Data Protection Regulation. These employees sign an additional confidentiality agreement for this purpose.



## Environment

The workplace and the environment must be protected. We therefore carry out our work according to applicable regulations and procedures.

# 4.

## We take responsibility



### **Sustainability**

We are aware of the impact of our cheese, packaging and business processes on the climate and the environment. We are a family business and want to be able to pass on what we do from generation to generation. As an employer, producer and supply chain partner, we therefore invest in sustainability. We safeguard this via Vepo Forward, our strategy for sustainable business.

### **Contribution to sustainable development goals**

Vepo Cheese is committed to contributing to the Sustainable Development Goals (SDGs) of the United Nations. These SDGs focus on achieving a sustainable and inclusive world by 2030. We have selected SDGs that allow us to make the greatest impact with our products and business processes.

### **Corporate social responsibility (CSR) in international business**

We deliver our cheese products far beyond our national borders. We are committed to the principles and standards of the OECD Guidelines for Multinational Enterprises.

### **Commitment of employees**

We expect employees to use, protect and maintain Vepo Cheese property and assets with the utmost care while performing their duties.



### **Working safely is partly up to you!**

We are all responsible for managing the safety of each other and of our products, and minimising the risk of incidents and accidents. Safety is a shared responsibility. We expect employees to remind each other of the rules and call each other to account for unsafe behaviour.

