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2A Plymovent's **Business Ethics Policy**

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V202501



Business Ethics – Our business's moral GPS

Welcome to our Business Ethics policy. This is not just a policy; it's our way of ensuring cleaner, safer, and healthier workplaces across all our locations.

We leave no room for unethical conduct, whether it's corruption, bribery, fraud, money laundering, anti-competitive practices, conflicts of interest, or lapses in information security.



Why a policy on business ethics?

Doing the right thing goes beyond delivering a high-quality product

Think of this policy as the moral GPS for our corporate journey. It's the set of principles guiding us through our day-to-day business. With this policy, we show commitment to the following principles:



We uphold integrity by playing by the rules. And we expect our partners to join us in this fair play.



We say "no" to any form of corruption and bribery.



We believe in transparent and fair play, with no tricks involved.



We prioritize honesty and put the collective good above any personal interests.



We protect everyone's data as if it's our own treasure.

Let's break it down! This policy is our guide to doing business right, and it's something everyone should know about. Here's what to expect:

- 1** Your role in the policy: Business Ethics is how we all play fair in the business game. Yep, it's for everyone!
- 2** Ethics targets: We've set targets on stopping corruption, avoiding conflicts of interest, saying no to fraud, and more.
- 3** Actions: We're not just talking the talk; we're walking the walk. Here we explain how we turn our targets into actions.

Good to know: With this policy, we've got the legal side covered, following all national and international laws wherever we operate.

Everyone counts! (1/2)

To guarantee that this policy is not just words on paper but something we live and breathe, we've assigned specific roles and responsibilities. Learn what your responsibility will be:

I'm an employee

- Take your time to read the policy carefully and familiarize with it. Bravo! you already made it to page 2.
- Notice any off-policy behaviour or actions? Let your manager or senior contact know.
- Join mandatory sustainability training or workshops. It's a team effort!

I'm in Group Management

- Enable your team to follow the policy by providing relevant documents, guidelines, trainings, or procedures.
- Monitor whether the policy is doing its job and adjust when necessary.
- Ensure a shared understanding among all stakeholders and commitment to Plymovent's sustainable procurement.

I'm the policy owner

- Guide your team in understanding and implementing the policy. Be the go-to for any questions.
- Monitor the progress on the objectives and report to management and relevant stakeholders.
- Keep the policy up to date.

See two more roles on the next page.

Everyone counts! (2/2)

I'm a contractor, supplier, or vendor:

- Align your operations with Plymovent's ethical standards
- Refrain from corrupt practices
- Ensure safe working conditions for their employees.

I'm a customer

- Don't you worry! At Plymovent, we are dedicated to treating all our customers with respect, honesty, and transparency.
- Any feedback on any ethical concerns regarding our products and/or services? Please share it with us.



Targets

Plymovent's ethical practice

We are committed to
ethical excellence.



Plymovent's ethical practice

					Target	Leitprinzip
GENERAL	ANTI-CORRUPTION & BRIBERY	CONFLICT OF INTEREST	FRAUD, MONEY-LAUNDERING AND ANTI-COMPETITIVE PRACTICES	INFORMATION SECURITY		
Maintain our integrity through commitment to ethical conduct.	Ban corruption and bribery in all forms.	Support our employees' social commitments without compromising their dedication to our organization.	Continue to prevent mis-use for money laundering or terrorist financing.	Prohibit the disclosure of confidential business information to any unauthorized third parties during or after an employee's tenure.		
Minimize risks of legal and guideline violations.	No preferential treatment or personal gain-seeking for employees or third parties.	Prevent employees from engaging in activities that could undermine our core business interests.	Comply with competition laws in our operating countries.	Safeguard all personal and third-party information with the utmost security and confidentiality.		
Yearly review of our Code of Conduct by group management.	Ensure everyone (current and new employees) understands our Whistleblowing Policy, creating a transparent culture of reporting serious misconduct.	Ensure that group management approves transactions involving close relatives to eliminate conflicts of interest.	Continue to reject unlawful agreements or contracts with competitors.	Annually maintain an untarnished record of zero data breach incidents.		
Conduct annual internal compliance audit.	Maintain zero reported incidents due to corruption.	Uphold the separation of personal financial matters from our business endeavours.	Forbid unauthorized disclosures of insider information.	Annual phishing email test.		
Maintain a clean slate of zero non-compliance incidents.		Don't share insider information. Whether it's for personal gain or to help someone else. And whether you've gained it while working here or from another company.	Conduct at least one impartial financial audit each year.	At least one information security audit per year.		
Yearly review Employee Code of Conduct by group management.			Maintain a clean record: zero legal complications/cases each year.			
			Maintain a clean record: zero anti-competitive practices each year.			

Turning targets into action

- Incident Response Procedure: Think of it as our security superhero, ready to tackle data breaches when they strike.
- Sensitive Transactions Procedure: Our guide for giving and receiving gifts, with a side of handling tricky situations.
- Due diligence: Our due diligence procedure is embedded in our financial reporting and signed off annually by an external financial accountant.
- Whistleblowing Policy: If you have concerns about this policy or witness any misconduct, we've got your back. Use the Plymovent Whistleblower policy to speak up – your voice matters to us.
- Open Communication Policy: We believe in open and respectful and direct communication, so our door is always open for your ideas and concerns.



Always keeping our policy relevant

Every year, the policy owner will take a close look at the policy and update it if necessary.

Let's stick to our policy! If someone chooses to disregard our policy, we may need to take appropriate action against the individual involved.

Any questions? Please contact Group Management.

Policy Owner



Name Friso Horstmeier

Position CEO

Date 01.03.2025

Location Alkmaar

Signature

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clean air at work