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## 2B Plymovent's **Sensitive Transaction Procedure**

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# Ethical Compass: A Guide to Transactions at Plymovent

At Plymovent, we're not just about clean air; we're about clean ethics too! We're dedicated to creating cleaner, safer, and healthier workplaces, and that commitment extends to how we handle our daily operations and interactions.

Our **Sensitive Transaction Procedure** is your guide to handling gifts and other transactions.



# What should I do with this procedure?

This procedure will guide you, our employees, to make the right decisions when faced with transactions that may have ethical implications.

We want to ensure an environment where employees feel supported and equipped to navigate any type of sensitive transaction.

Considering Plymovent's global reach, we acknowledge and respect a wide spectrum of cultural norms while maintaining uniform ethical standards throughout the organization.

This procedure applies to everyone at Plymovent, whether you're an employee, contractor, or stakeholder. Use this procedure when:



Gifts are exchanged.



Other transactions raise ethical concerns or questions.



Plymovent's  
step-by-step approach to

# Navigating the do's and don'ts

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# Gifts/transactions you...

## ... can welcome

- **Promotional Items:** Company-branded pens, calendars, and notebooks - essentially, any item that promotes brand awareness without significant monetary value.
- **Tokens of Appreciation:** Flowers or chocolates to show goodwill, not to gain favor.
- **Holiday Treats:** Gifts tied to cultural or universal celebrations, limited to 50 €/USD.
- **Hospitality Invites:** Modest dinners and lunches for genuine business connections.

## ... should (politely) decline

- **General rule:** Anything over 50 €/USD is a no-go.
- **Cash or cash-like:** Money, gift cards, vouchers or crypto currency are off-limits to keep our transactions honest.
- **Luxury surprises:** Fancy jewelry or high end gadgets don't make the cut.
- **Repeat offenders:** Too many gifts from the same source can raise concerns.
- **Suspicious presents:** If it feels like a bribe, it probably is. Report it and politely decline.

Not sure? If you ever have doubts about anything offered to you, reach out to your manager via phone or email. Together, you'll decide the best course of action. In case of uncertainty, please revisit this procedure and follow it accordingly.

# About this procedure

Always keeping an eye on our procedure. The Environmental & Safety Officer conducts regular reviews to make sure we stick to our procedures. In case of irregularities, Facility Management will be informed and find a swift resolution.

**Any questions? Please contact Group Management.**

## Policy owner



Name Peter van Aken

Position Commercial Director

Date 01.03.2025

Location Alkmaar

Signature



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clean air at work