



The right energy to connect

Hanab Code of Conduct

www.hanab.nl

 **Hanab**

Introduction

Dear colleagues

At Hanab, everything is about people. The way in which we treat one another explains exactly who we are. How we relate to the outside world speaks volumes about our engagement with clients, suppliers, subcontractors and other partners. It's about the right energy to connect. As the saying goes, 'put good in, get good back'. In other words, if you do nice things for others, you'll enjoy a positive response in return.

The rules of this Code of Conduct are the backbone of Hanab. They are the rules we live by and demonstrate what we stand for. They offer clarity to those who work for and with us. If we follow these rules, we help to minimise the risk of misunderstanding and error, which is good for us as a business and for everyone who works here.

Stay true to yourself, to others and to the world around you. That's what it's all about. Honesty is essential and we always endeavour to make the right decisions. Easier said than done, perhaps. Which is why it's important that we keep talking to one another. If we come to agreements together, it makes collaboration all the easier. This way, we can keep work both fair and enjoyable.

But how do we do that in practice? Sometimes, it can be difficult – there's always a grey area. This Code of Conduct gives you a foundation, a clear basis that you can fall back on when you need to. As Executive Board and Supervisory Board, we stand fully behind this Code of Conduct and will keep to it ourselves. We expect you to do the same. Only together can we keep Hanab strong, safe and reliable. That means leading by example and approaching colleagues if necessary.

Hanab's slogan is '**the energy to connect**'. The title of this Code of Conduct builds on that slogan to become '**the right energy to connect**'. And that's all there is to it! If we can make connections with each other with the right energy, all will be well.

Best wishes.

On behalf of the Executive Board and the Supervisory Board.





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Why does Hanab have a Code of Conduct?

The Code of Conduct: These are the rules that we all follow

'If we all adhere to these rules of conduct, everyone will know who we are and what we stand for.'

Rules regarding good conduct

The goal of this Code of Conduct is to clarify how we interact with one another, our relationships, the environment and the society we are a part of. These rules apply to all Hanab employees, from trainees to directors. In addition, we also expect our business partners, such as clients, suppliers, subcontractors, freelancers and other partners to adhere to our Code of Conduct. Everyone who works with or for our company can be held to these rules.

The Code of Conduct cannot cover every possible situation. Always use your common sense and don't hesitate to ask if you are ever in doubt. So whether you're in the office, welding in a construction pit or visiting a client, professional conduct is the standard for everyone who works for Hanab. If we keep to these rules of conduct, the atmosphere will remain positive, our end product will be better and we will maintain customer satisfaction.

Violating the rules

Failure to comply with these rules can have serious consequences. The same applies when someone fails to report a violation of the rules. The severity of the consequences depends on what happened. There may be a warning or

workplace action. Serious violations could result in dismissal and may also be reported to the police. Violations of this Code of Conduct (with its accompanying guidelines, manuals and other regulatory documents) could give rise to sanctions. If you suspect that someone has violated this Code of Conduct, you have a duty to report it internally.

The Code of Conduct in practice

If something happens at work that you think doesn't feel right, you should speak to your supervisor, confidential advisor or the (central) compliance officer. The final pages of this Code of Conduct explain the process in practice. Together, you can work out how best to proceed.

'I am familiar with the Code of Conduct and what it says.'

'I use the Code as a guide if ever I'm in doubt about what to do.'

'I approach colleagues if I see them violate the Code.'

'I ask questions if ever I'm uncertain about something.'

'I appreciate it if someone explains to me what I'm doing wrong under the Code.'

'If I have concerns, I report them immediately.'

'I have a duty to report serious wrongdoing and danger immediately.'

Four core values: The compass points of our conduct

Hanab cherishes four core values which are the foundation for how we do things. Everything we do must align with these four compass points. We are committed to craftsmanship, safety, sustainability and connection. Those who work with us can trust that we will always remain true to these four principles.



We work with craftsmanship: to build well you need to use your hands AND your heart. We are honest, tidy and reliable towards one another and towards our customers. We don't choose the easiest route, we choose the correct one – not because that's what has to be done, but because that's what is right. Our good name means that we gain more work and experience fewer problems. A good reputation is as valuable as gold.



We are committed to sustainability: we are building for today and for tomorrow. We think ahead, use materials and tools sensibly and take a smart approach to water and energy. This way, we contribute to a liveable future for this generation, our children and grandchildren and the generations that follow.



We guarantee safety: safety is paramount – both in the way in which we work and how we treat one another. We have a safety plan in place entitled 'Everyone home safely'. A safe working environment also means that people feel safe to report wrongdoing and that there is always someone you can approach when you wish to discuss problems.



We guarantee connection: good work is not only visible in the end result, but in everything that we do. Even when no one's looking. When we're working on site, we work as one team. We laugh together and take on challenges together. Open communication creates trust and ensures that everyone is on the same page. That way, we can build faster and better.



Rules within our company



Equal treatment and inclusivity: Participation from everyone

'I don't make unpleasant jokes or discriminatory comments at work.'

Everyone deserves respect. It doesn't matter who you are or where you come from. Skin colour, religion, age, gender, sexual orientation, marital status, political beliefs or nationality: it makes no difference. At Hanab, everyone can be themselves and everyone has equal opportunity.

A new colleague should feel welcome and be immediately integrated into the team. We never make unpleasant remarks about someone's appearance, accent, or background. There is no tolerance for bullying, intimidation, discrimination, ridicule, unpleasant jokes, etc. There is no favouritism. Family and romantic relationships at work must always be reported to a supervisor.

We take our colleagues into consideration. If someone wishes to pray, we make sure that there's a space for them to do so. If requested, women can be given a private dressing room for their work. If someone works on a part-time basis, we respect it. Talk to each other, make your needs known and help colleagues if they're being treated inappropriately, rudely or improperly.

'I consider commitment and output, not origin and background.'

'I give everyone the same opportunity. If someone is able to do the work, they should do it.'

'I appreciate diversity. A good team is not one made up of clones.'

'I don't make jokes or remarks at the expense of others.'

'I dare to be myself and give others the space to be who they wish to be.'

To put our approach in a nutshell – we treat one another professionally. These 'normal' rules of conduct are an integral part of how we do things. By following them, we can work together to make sure that everyone feels safe and valued. Equal treatment isn't something we do just for show – it's the foundation of how we work together.



Company assets: Proper use counts

Company assets are all the company items that you use to do your work. Company assets belong to the company – not to you personally. They include:

- Tools: machinery, measuring equipment, hammers and pliers.
- Materials: cables, pipes and tape.
- ICT equipment: laptops, telephones, tablets and printers.
- Vehicles: vans, forklift trucks and trailers.
- Clothing: workwear, PPE such as gloves and helmets.
- Means of access: passes, keys and codes.
- Documents: construction drawings, customer data, schedules and e-mails.

In principle, you should only use company assets for your work. In most cases, that should be clear. If you drive to a DIY store on a Saturday, you take your own car with you, not the work van. If there's a roll of electrical cable left over after a job, you don't put it in the boot of your car. If your child is working on a school project, you shouldn't use office printer paper for it – even smaller materials belong to Hanab.

There are obviously going to be borderline cases. If there's no safe, it makes sense for you to take your laptop and mobile phone home with you. Occasionally, you might need to take them with you to finish work or be contactable. In that case, always make sure that you have proper security in place (e.g. a VPN). If there's food or drink left

over after a working lunch, it's perfectly acceptable to take it home as otherwise, it'll be thrown away.

Always handle company equipment with care and attention. When you drive a Hanab bus or car, you represent our company. Obey the rules of the road. Don't tailgate other vehicles or race through red/amber traffic lights. Park properly and give way to other road users. Additionally, make sure that you don't leave your belongings lying around on the construction site or in the van – this helps to prevent loss and theft. Make sure that you leave things clean and tidy when you've finished. Smoking is prohibited in Hanab vehicles as they are places of work.

'I use company property for work only, not for my own private purposes.'

'I never take anything home without permission.'

'If something is broken, I report it.'

'I return items that I no longer need.'

'I treat company property carefully and properly.'



Digital tools: Resources that work

'One wrong click and everything comes to a halt.'

Hanab doesn't just work with machinery, materials and tools – laptops, mobile phones and digital networks are just as valuable to the company. We handle them with the same care as we do other equipment. One wrong click could bring the entire company to a halt, so we pay attention to what's on the screen as well.

A data breach means confidential information ends up in the wrong hands. It could happen entirely by accident. Your laptop, tablet or mobile phone could be stolen, you could lose a USB drive or there could be an office break-in. An employee could also send a file containing

customer data to the wrong person by accident. Any incident of this nature must be reported immediately – every second counts.

A data breach can also be caused by an external attack. E-mails could contain viruses that cause damage or steal confidential information. They might also be infiltrated with ransomware, making it impossible for us to work without first paying a ransom. If a password is leaked, a criminal could access our networks without our knowledge. They can then log in and steal customer data, manipulate appointments, modify invoices, obtain trade secrets or install malware that is harmful to our computer networks. It's essential that we remain vigilant, including when we're working at our screens.

When it comes to digital security, human behaviour is the weak link, which is why we need to pay close attention. Don't delay software or app updates. This prevents cybercriminals from infiltrating through a bug in an outdated software program. Don't download games, social media or illegal files as these can infect your computer. Don't send construction drawings, customer data or work e-mails to your personal computer so that you can continue working from home. It's not secure and sometimes even illegal. Keep passwords secret. Use different passwords for work and home. Don't use the same password for different accounts and always log in with your own account. This prevents data leaks, keeps our systems clean and protects our customers, partners and everyone's privacy.

Hanab has an official Information Security and Privacy Policy which sets out the rules and objectives for securing our digital activities. Every employee with access to our servers must know and comply with these agreements. It's how we keep cybercriminals, spies and hostile countries out.

The Information Security and Privacy Policy can be accessed on the Hanab Intranet. It is only available internally.

If you suspect that there is a problem with digital security, report your concerns to the Hanab Security Hotline immediately at meldpunt_security@hanab.nl.

Remember, there's more to security than just protecting digital information. Paper-based data can also cause a data and/or security breach.

'If my laptop, phone or tablet is lost or stolen, I report it immediately.'

'I treat my laptop with the same care as I would other tools.'

'I only use my work e-mail and apps for work, not for private purposes.'

'I keep my password a secret and share it with no one.'

'I never store work data outside the secure work environment.'

'I don't open suspicious links or attachments. Better to check first than be hacked.'

'I don't send work documents or updates using my personal e-mail account or WhatsApp.'



Rules outside our company



Honest business with integrity

We believe in honesty, openness and healthy competition. We never work with false invoices, fix prices, engage in bribery, submit inaccurate returns or accept/give payments in kind. We don't conduct business with cash. This prevents projects from being financed with criminal assets. We don't participate in corruption or facilitating payments. We only do business with honest parties. We don't collaborate with parties under trade restrictions or sanctions.

Bribes can take the form of gift cards, cheques and pre-paid cards but can also be concealed in discounts, sponsorships, commissions and fees. Be alert! Commercial advantage might seem appealing, but fraud and money laundering are shady practices that work to undermine the industry.

Never share sensitive company information without permission, especially not with competitors. Always check with the Legal department before sharing or accepting sensitive information from competitors. Sharing information without permission is prohibited, even within the company. Make sure that you only share sensitive information with colleagues who need it as part of their role within the company. For example, if you are working on a project or acquisition, only share the information with the project team. Always ask the project manager for permission before sharing the information with colleagues.

Always be vigilant when talking to competitors. (Price) agreements to divide the market are a violation of competition law. Making these agreements is illegal and can lead to serious reputational damage and even business closure.

'I don't forge invoices or other data.'

'I am alert to unusual transactions and sanctioned parties.'

'I don't accept or make cash payments.'

'I don't accept or disclose confidential information before discussing it with the Legal department.'

'I have a duty to report suspicions of fraud and money laundering.'

'I don't participate in corruption or facilitating payments.'

'I don't make agreements that could restrict honest competition.'



Gifts and Invitations: What is appropriate?

'Accepting gifts or invitations? If in doubt, don't!'

We never give or accept gifts or invitations designed to influence (business) decisions. This also means not accepting cash, vouchers or gifts in exchange for assignments, favours or preferential treatment. This also applies to trips, luxury excursions and private invitations paid for (in whole or in part) by a business contact. This type of bribery and corruption is unfair and often prohibited.

Small tokens, such as a pen, a bottle of wine or a bunch of flowers have symbolic value and can be accepted (or given) so long as they are worth no more than € 100. The same applies to business lunches and networking events, such as trade fairs or seminars, but nothing more. If in doubt, ask your supervisor. Otherwise, don't do it.

Donations and sponsorships can contribute to a positive image, valuable relationships and community involvement, but such arrangements must be open and honest. All proposals for sponsorship and donation must be approved by the head office. Initiatives must align with our four core values and may not be for personal gain. We do not sponsor political organisations, individuals or parties.

'I am honest and independent.'

'I don't allow myself to be influenced by gifts, promises or invitations.'

'If someone offers me something and it feels wrong or uncomfortable, I report it.'

'I don't accept or give gifts worth more than € 100.'

'I only offer sponsorship or donations after seeking approval.'



Sideline activities: What is permitted and what isn't

'Company tools are used for work, never at home.'

Sideline activities are any work you do outside of working hours. They can be entirely harmless. Teaching a safety course in the evening hours is no problem. Running a hobby club at an activities centre isn't an issue either. But if you spend your evenings working for suppliers, competitors or clients, there may be a problem. If you do engage in sideline activities, report them and always ask your supervisor for permission.

You can help your parents with renovation work, of course, but you should use your own tools, not company tools. This also applies to the company van. It shouldn't be used for moving or for other journeys. If you spot a colleague engaging in sideline activities at the weekend, check that they have permission. If they don't, make sure to remind them of the need to report it. Report any violations of these rules. Turning a blind eye and remaining silent contribute to dishonest conduct. It harms our company and spoils the atmosphere amongst colleagues.

The simple rule is to always report sideline activities to a supervisor in advance. He or she can then determine whether these activities are harmful to Hanab. It's also important to consider any conflicts of interest. These come about when your own interests conflict with those of the company. Report them and avoid making decisions that could pose a conflict of interest.

**'I keep my work life and
private life separate.'**

**'I never make work decisions
that benefit me personally.'**

**'I ask permission for
sideline activities.'**

**'I never work on assignments
that benefit family or friends.'**

**'I approach colleagues
if they abuse trust.'**



Social media: Make smart connections

'I also keep my private life and work life separate online.'

Social media platforms can be fun and interesting, but should always be used responsibly. We have one simple rule and if you follow it, you can't really go wrong. Don't post work-related topics on your private channels, and vice versa. Don't share anything personal on Hanab channels (and in the forums where you're active as a Hanab employee). Why? Because keeping your work and private life separate is clear, safe and professional.

Don't complain about a difficult client on your personal Instagram page. Don't complain about a tricky job on Facebook. Don't post videos on TikTok about a nice new Hanab excavator. You can report that you work for Hanab on LinkedIn, but don't use your work account for private expressions. Private is private. And remember that what you put on the internet never goes away.

You can share text and photos about work on Hanab's social media accounts. A completed project deserves to be highlighted, but be careful not to share any personal thoughts.

Your colleagues are not social media content. If in doubt, consult your division's communications officer.

More information about the use of social media can be found in the social media policy. The social media policy can be found on the Hanab Intranet. It is only available internally.

'I don't post about work or colleagues on my private social media channels.'

'I don't post personal messages on work social media channels.'

'I respond politely to messages from others.'

'I think before I put something online. What I put on the internet never goes away.'

'I don't disclose information about clients, construction sites or internal affairs.'



Rules governing violations of the Code of Conduct



Laws and regulations: How we stay on track

**'If it's illegal, I don't do it.
Not even under pressure.'**

We work according to the laws and regulations that apply to our profession. Always and everywhere. Outside on site and inside in the office. Thinking of climbing scaffolding without a helmet? Don't do it, your life could be at risk. Considering putting everything in one waste container as it's easier to clean up? Not a good idea. That will cost money later on and is bad for the environment. Thinking of quickly modifying a design? No, there's a reason the drawing is the way it is. Legislation regarding cybersecurity and other aspects is also becoming increasingly important. Our clients are pushing it too. You need to be aware of this.

As an example, if Hanab conducts work for the government, it's important that you know the relevant procedures. There are numerous procedures that can sometimes be complicated, especially with large tenders. Ask one another for advice. This way, we can navigate through the paperwork smoothly and keep the end goal in sight.

A counter clerk in the office or on site is often the first point of contact for the outside world. It's important that the role is exercised with professionalism and a friendly face. In addition,

all of our locations have counter instructions available. These instructions detail how raids by certain authorities should be handled.

Laws and regulations are a key part of our work. Make sure that you know what applies and don't hesitate to ask for help if ever you are in doubt. Because at Hanab, we follow the rules. This means that we have fewer accidents, we avoid problems with inspections and fines, our customers and partners are satisfied and we maintain our good reputation. And that, in turn, leads to new assignments!

'I adhere to the legislation and regulations that apply to me.'

'Either I work safely, or not at all.'

'I pay close attention to the safety of my colleagues.'

'I report incidents so that we can all learn from them.'

'I follow building regulations and work according to technical requirements.'

'I cooperate with checks and inspections and follow the counter instructions.'



A safe and healthy working environment

'If you have to deal with something that doesn't feel right, don't keep it to yourself.'

The health and safety of those we work with is paramount. Make sure that you're fit to work, be mindful of the medication that you take and make sure that alcohol and drugs don't affect your work. You can ask the company doctor for advice.

If you have to deal with something that doesn't feel right, don't keep it to yourself. Talk to the confidential advisor or the compliance officer. They are there specifically to listen and to help. Their door is always open. You don't need permission, and whatever you say is kept confidential. If you'd prefer not to talk to the

confidential advisor or compliance officer, think talking to them wouldn't work or would prefer to share your concerns anonymously, you should use the confidential helpline programme. You can share your story with the helpline (anonymously) at any time. You can find a link to the confidential helpline programme in the final section of this Code of Conduct. Please consult the ADM policy for all rules relating to alcohol, drugs and medication. **Several divisions have an ADM policy in place in addition to the above.**

We have a safety plan in place that helps ensure that work is conducted safely. It can be found on our website. If you have any questions, please send an e-mail to iedereenveiligthuis@hanab.nl.

The compliance officer and the confidential advisor have different roles, but both are there to make sure that we maintain a safe, fair and honest working environment. One achieves this with rules and (compliance) monitoring, the other through personal support. Both take action when something inappropriate happens. They are independent and help resolve problems through conversation, investigation or referral.

The confidential advisor or compliance officer will listen carefully to your concerns without judgement. He or she will work with you to see what you can do to improve the situation. If you'd like, you can get tips on the right steps to take. You decide what happens after the discussion.

Everyone at Hanab can talk to the confidential advisor or compliance officer if they have problems. The sooner you contact them, the better. This prevents problems from escalating, which negatively impacts the atmosphere and safety at work. Don't hesitate. There are no stupid or wrong questions.

'I make sure that I'm fit to work.'

'I consult the confidential advisor or compliance officer if I have concerns.'

'I know that I can tell my story.'

'I know that everything I say is said in confidence.'

'I respect it when a colleague asks for help.'

'I know that the confidential advisor or compliance officer will work with me to provide the help that I need.'

'I can use the confidential helpline programme in extreme cases or when

I wish to remain anonymous.'



Questions, suspicions and reports

Questions, suspicions and reports

Do you have questions or suspicions of misconduct? You should always discuss them. If you say nothing, you could unintentionally make the situation worse. If you have serious suspicions, such as those involving illegality or risks to health or safety, you have a duty to report them to the Central Compliance Officer. In extreme cases (or if you prefer to submit an anonymous report), you can also use the confidential helpline programme.

For questions, suspicions and reports, you can contact the confidential advisor or the compliance officer. But which one?

The confidential advisor:

- You feel excluded by colleagues.
- You are being harassed or bullied.
- Someone is making racist or sexist jokes.
- You have problems at home that affect your work.
- You have problems with alcohol, drugs or medication.

The compliance officer:

- A colleague is stealing material or tools.
- A colleague wrongly reports in sick.
- There is an unsafe situation at work.
- Dishonest returns are being submitted, or there's fraudulent activity.
- Someone uses violence against you or a colleague.
- Agreements about work and rest times are being violated.

TIP:

Prepare for the discussion: What exactly happened? Where and when? Who was involved? Were there any witnesses? The more facts you have, the more effective the follow-up action will be.

There's also a confidential helpline programme that anyone can use to report something at any time. **The confidential helpline programme can be found on the Hanab website.**

You can find out who your compliance officer and confidential advisor are at the link below. **An overview of all compliance officers and confidential advisors can be found on the Hanab Intranet. It is only available internally.**

In this Code of Conduct, 'Hanab' is used to refer to the group of companies that make up the Hanab Group BV group (including Vita BidCo BV). Laws and regulations that are more stringent than our Code of Conduct or manuals take precedence.

Contact details

For questions or comments about the content of these rules of conduct, e-mail compliance@hanab.nl or www.hanab.nl

Version 1.0 - september 2025