code of conduct 
annex – speak up!

Management Board, the chairman of the Supervisory Board of Aalberts Industries N.V.

ask or tell

The confidential advisor also provides assistance with the assessment of a situation and whether or not it appears warranted. If you are uncertain if certain conduct is allowed or if you have any concerns about possible wrongdoing in your company and you cannot discuss that with your manager or otherwise within your company, you can always in a confidential manner ask the confidential advisor at Aalberts for his advice. No formal report will be made if only a question is asked.

transparency & follow up

In order to ensure transparency, your report (whether via the website or any other person dedicated by the relevant person in your company or any other person dedicated by the relevant person in your company) may be subject to disciplinary actions as permitted by local law. Especially, unfounded reports, malicious reports, or reports made to hurt someone are strictly prohibited and considered a breach of employee’s duties.

If under applicable law a person affected by reports must be informed on an investigation, we shall do so as soon as reasonably possible. Unless obliged by law or insofar you agree to disclose your identity, the confidential advisor will keep your identity strictly confidential.

anonymous reporting and external parties

Although this is not the preferred route and we strongly encourage you to identify yourself to facilitate the investigation of your report, anonymous reporting to the confidential advisor is also possible via the Speak Up! form on the website. Although you can in such case not be involved, it will allow the confidential advisor to investigate the matter. Anonymously reported misconduct is however always rendered ineffective if the involvement of external parties. It is allowed to report alleged or threatened misconduct to a counsel for advice insofar that person is bound by professional confidentiality rules.

In the following circumstances you may report the misconduct to an external third party (other than the above-mentioned counsel): (i) an acute danger in which a serious and urgent public interest requires an immediate external report, (ii) a previous internal report according to the same standard misconduct has not resulted in the misconduct being addressed, or (iii) a legal or statutory obligation to immediately report externally. In such cases you should also report the misconduct to the confidential advisor as this requires attention from the press or through any kind of (social) media is always considered wholly inappropriate.

The main message of this Annex is that you are encouraged to report (alleged or threatening) misconduct, that your report will be treated confidentially and that Aalberts will do anything in its power to safeguard that you will not experience any kind of retaliation as a consequence.

examples

There are cases where you might want to overhear a conversation between your sales manager and one of our competitors. The manager is obviously discussing price sensitive information that is legally forbidden. This is extremely important. Please, report this immediately to the managing director of your company and to the confidential advisor.

example 3: A safe work environment is of utmost importance. If violations of safety regulations occur, this must be reported. If your manager does not take your concerns seriously and a dangerous situation continues, please communicate your observations to a manager higher in rank, the general management or any other person dedicated by the relevant company for the handling of misconduct within that company.

example 4: If you discover that border security officials charged with the responsibility of checking products are offered payments or entertainment, this constitutes a criminal offense and could potentially ruin the reputation of our company. This bribery must be reported immediately to the managing director of your company and to the confidential advisor.

Q&A

question 1: I suspect my manager of having effected a hiring policy that is discriminatory to certain groups. What must I do?

answer 1: Discuss the situation with your manager. If your manager does not take your concerns seriously, please communicate your observations to any other person dedicated by the relevant company for the handling of misconduct.

question 2: I have some very serious suspicions but I am afraid that sharing this information could harm people’s reputations and jobs. Is it normal to feel reluctant to report this?

answer 2: Yes, this is very normal and it shows compassion for your colleague. However, failing to report may harm your company, Aalberts and the jobs of people working there. Besides that, it is possible you have misunderstood the situation or behaviour to be dangerous. Therefore, failing to report may harm your company, Aalberts and the jobs of people working there. Besides that, it is possible you have misunderstood the situation or behaviour to be dangerous. Therefore,