

INFRA, MILIEU EN SLOOP



CODE OF CONDUCT

Introduction

The Sagro Code of Conduct (hereinafter "Code") provides concise information on the rules that apply within the entire Sagro Group (hereinafter "Sagro"). The Sagro Group consists of Sagro Holding Zeeland B.V. and its affiliated businesses. The code of conduct comprises rules of conduct that apply within Sagro. Sagro expects not only its own employees to adhere to these rules, but also all clients, (sub)contractors, suppliers and other business relations. The person reading this code of conduct is deemed to be familiar with this code and to comply with it.

These rules have been drawn up to enable us to implement a policy that is as transparent and clear as possible, and in which honest and pleasant cooperation between all parties can be upheld. By adhering to the instructions, we are jointly working on the quality of our work, the continuous improvement of the working conditions of all parties involved and the protection of the environment.

's-Heerenhoek, June 2018

Executive Board Sagro Holding Zeeland B.V.

Code of Conduct

1. Integrity

Sagro does business transparently and on a basis of mutual trust in all its interactions with clients, subcontractors and suppliers. Integrity is a major element of this approach.

Sagro considers it important to maintain good relations with business partners. This implies, among other things, that gifts and/or invitations are only offered if there is no quid pro quo. Sagro will not attempt to influence a business relationship in an inappropriate way or ask a business partner to abuse a particular position. If doubt arises within Sagro with respect to a particular situation, this shall be dealt with openly and transparently by first presenting the situation to the supervisor.

Sagro is transparent about the choices it makes when sponsoring organisations and activities. Sponsorship policy is not self-serving and is not arbitrary. We can always justify our choices.

2. Professionalism

Sagro strives to conform as closely as possible to current legislation and regulations. Human rights, as laid down in the European Convention on Human Rights and Fundamental Freedoms, will be respected at all times. Furthermore, Sagro will not be party to:

- Conduct which is contrary to European and Dutch competition law;
- Conduct on the basis of which a contractor may be excluded from participating in a tender procedure pursuant to Article 24, sub c to sub g, of Directive 93/37/.EEC (and the corresponding provisions in the other European tendering directives);
- Any other form of criminal conduct in dealings with clients and competitors.

Sagro will also comply with its administrative duties. All transactions that the management and employees enter into on behalf of the company are properly recorded in the administration in accordance with the applicable procedures, which must be transparent and verifiable.

3. Safety

Safety is our number 1 priority! This is the most fundamental issue within Sagro. Sagro makes every effort to ensure not only the safety of its employees, but also the safety of its supply partners, the public and its projects.

Sagro has put this into practice by appointing an internal Quality, Health, Safety and Environment officer. This officer is responsible for ensuring quality control, working conditions and the environment. This means that there are procedures and rules that apply to the entire organisation which must be followed to the letter.

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In practice, Sagro implements its safety policy by ensuring that employees participate diligently in safety instructions, toolboxes and the use of the personal protective equipment (PPE) that has been made available. Sagro has also developed the so-called "HSE - Safety booklet". This is an instruction booklet given to all employees, listing all the safety regulations.

Safety and health go hand in hand. By creating a healthy working environment and atmosphere, you are investing in your employees. To this end, Sagro has drawn up a policy regarding issues such as alcohol, drugs and smoking.

4. Quality

Besides safety, quality is also a priority at Sagro. Sagro's employees are only satisfied if, through efficient and effective work, they achieve the highest attainable quality. In this regard, Sagro keeps a close eye on technological advances and developments, so that it can work as effectively and efficiently as possible each and every time.

In order to guarantee good quality, Sagro needs to be constantly innovating. Together with clients, (sub)contractors and suppliers, we must always arrive at sustainable solutions that address not only economic interests, but also environmental and social interests, creating a well-balanced overall situation.

Compliance

Sagro has appointed a supervisory officer. This person not only supervises compliance with the code, but also acts as an advisor within the company. When a supervisor is appointed, the executive board determines and announces the duties and powers encompassed by this role. The supervisor fulfils a function of trust and therefore takes the greatest possible care with the matters which fall under his/her supervision.

The company code is not optional. In the event of a breach of this company code, the employer will impose sanctions which, depending on the seriousness of the case, may vary from a reprimand, suspension and removal from office to instant dismissal.

If a particular behaviour is not described in this code, but may be contrary to the spirit of the company code, the supervisor will decide on the applicability of the code and advise the employer to impose sanctions if necessary.

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