

## Code of Conduct for employees of the DOEN Foundation

### Introduction

The Code of Conduct describes the desired behaviour of employees towards each other and towards business partners in general terms.

1. We think it desirable to make clear agreements with each other on how to deal with business gifts.

In this way, we draw a common line with regard to each other and to external parties, and we prevent partiality and conflicts of interest.

2. We make it clear what forms of participation in the Lotteries we allow employees.

3. We want employees to behave correctly towards each other.

This regulation therefore describes the specific rules for:

- offering and accepting business gifts, gratuities and invitations.
- playing in the Lotteries.
- rules of conduct and behaviour.

These rules are aimed at dealing with business partners and with each other with integrity.

#### 1. Accepting corporate gifts

- It is important to keep sufficient distance from applicants and suppliers. In this way, the applications/agreements can be properly assessed and concluded on a completely objective basis.

- In this context, it is also desirable not to allow major differences to arise between employees owing to their jobs.

- It is important that applicants/suppliers (and third parties in general) are aware of this Code of Conduct. For this reason, this Code of Conduct can also be communicated to external stakeholders.

- Employees cannot accept free items for personal use. This also includes admission tickets with an economic value (or sales value) higher than €150.

- Employees cannot accept a personal discount for private purposes. If the discount can be negotiated for all employees, the applicable procedure will be followed.

- The employee must inform their team manager immediately of personal invitations (e.g., where you go to a concert or football match with the business partner). Team managers must report this to the Executive Board.

The team manager or the Executive Board will decide whether the invitation can be accepted. If the invitation takes place on a working day, the employee concerned must take a day's leave.

- All Christmas gifts must be handed in for the big Christmas raffle among all employees.

Any deviation from the above rules must be discussed with the team manager and/or the Executive Board.

#### 2. Playing in the Lottery

##### A. The Executive Board playing in the Lottery.

Members of DOEN's Executive Board may play in the Lotteries. If they win a prize of more than €5,000 per ticket (before payment of gambling tax), this prize is not paid out to the person concerned, but is refunded in full to the prize pot. The Executive Board will provide information about the amount of the prize won on its own initiative and truthfully.

### **B. Other employees playing in the Lottery.**

Employees are only eligible for prizes won by them in one of the Lotteries' draws. Employees are not allowed to participate in a recording of one of the television shows where a sum of money can be won by performing an act, such as answering questions. However, if a gift is presented to the audience during the recording, the employee may accept it. The employee may not transfer an invitation to one of the shows to a third party. Employees are expressly excluded from participating in phone-in games and promotional games of chance organised by the Lottery (whether or not in cooperation with third parties), both during and outside the performance of their work. This exclusion from participation also applies to partners and children of the employee living at home.

Under no circumstances may employees accept gifts of cash and/or non-cash prizes won by players. Information concerning the games of chance organised by the Lotteries, including draw files and/or other confidential information which may increase the employee's chances of winning a prize or prizes, must be treated as confidential by the employee. Under no circumstances is it permitted to use such information for personal gain or to make it available to third parties, unless the employee is required to do so by virtue of their position.

### **3. Confidentiality, confidential information**

DOEN employees must treat the information made available to them by virtue of their employment with care and propriety. The employee must treat as confidential any information which could harm DOEN and/or individual employees if third parties were to become aware of it. Passwords and access codes for the use of computers and databases are personal and may not be given to third parties.

### **4. Discrimination**

At DOEN, everyone is treated equally and with respect, regardless of gender, race, skin colour, religion or sexual orientation.

### **5. Sexual harassment, bullying, gossip**

All employees shall refrain from sexual harassment and bullying in the workplace. Gossiping and slandering colleagues, both internally and to third parties, is inappropriate.