

CODE OF CONDUCT

Primaverde BV

Version 2021



A clean and safe way to work



A clean and safe way to work

At Primaverde, we are passionate about developing, making and selling reliable products for a safe and clean way to work. With our products, we provide safety for surfaces, areas and people. Our ambition is to be the reference in the industry.

Being a developer and provider of products in the field of cleanness and safety, creates obligations to the way we fulfill our role. As a leading supplier, it is not just about making the best products and performing well financially, but also about being a reliable business partner. We want our customers and business partners to know what they can expect from us.

This is why we interpret our main values to the effects on Safety, Integrity and Sustainability. The Code of Conduct explains how we put them into practice. It lays out expectations and responsibilities within the company, which also extend to those whom we do business with.

At Primaverde, we do business in a safe, honest and sustainable way. We face dilemmas and make choices every day. Our Code of Conduct gives us the confidence to make the right decision. Sometimes this means walking away from a business opportunity when it doesn't meet our high standards. It takes courage and determination to do what is right, and our Code of Conduct is there to help us make the right choices.

We strive to live by it because it is a condition of working for and with Primaverde, but also because it gives us pride and confidence in what we do.

Robert Furgler, CEO and founder
Annemiek Loonen Furgler, CFO and founder

This is our Code of Conduct

Our Code tells us what we stand for. It explains our core values and what they mean in practice. It defines what we will and will not do.



This is our Code of Conduct

Primaverde provides products for a clean and safe way to work. These terms affect the way we behave. Working clean and safely has its effect on:

Safety

- We care about the safety of our colleagues and everyone we deal with, and focus on people, process and product safety.
- We follow the safety rules and procedures.
- We follow the Life-Saving Rules.
- We stop work if behavior or conditions are unsafe.
- We make and distribute products safely.
- We report safety concerns immediately.

Integrity

- We care about conducting our business in a fair and honest way.
- We compete in a fair and honest way.
- We follow trade restrictions carefully.
- We protect personal and confidential information.
- We keep a clear line between business and personal interests.
- We look after company property and use it appropriately.
- We keep records in accordance with company policies.
- We are alert to fraud and report suspicious activity.
- We communicate in a professional way.

Sustainability

- We care about our environment, our colleagues, our business partners and the communities we operate in.
- We recognize human rights and treat people with dignity and respect.
- We recruit and manage employees fairly
- We reduce the environmental impact of what we do.
- We address the concerns of those affected by our operations.
- We give back to communities we operate in.
- We work with business partners who share our values.



What is the Code of Conduct?

The Code defines the way we live our core values every day. Whether you work for or with Primaverde, these are the responsibilities and behaviors we expect of you. It's a shared standard we can all be proud of, and an integral part of our rules and procedures. You should use these to find out more about how the Code applies to you.

Who is the Code of Conduct for?

Everyone who works for Primaverde must follow the Code, whether they're an employee or contractor. We also have a Business Partner Code of Conduct, based on the same values, which covers the responsibilities of our partners, including suppliers, distributors and agents.

What is expected of us?

Every one of us needs to understand the Code, its policies and how we should behave as a result. While you may find it easier to apply some parts of the code to your specific role, it's important you ask questions about any part you are unsure of. If you cannot find a clear answer to an issue, use good judgment and discuss it with your manager if needed. And, if you are a manager, you are also a role model. Help your team understand how to live our values and hold them accountable for their behavior.

What if the Code of Conduct is breached?

Failing to follow the Code may lead to disciplinary action, including dismissal. If you see any breaches, raise them in a timely manner with the individual, your manager, or share your question with us. You can find further guidance at the end of this document.

Why our Code of Conduct is important

One standard

It helps us take the right decisions and shows what we stand for.

A reliable partner

It shows our customers, business partners and the authorities that they can count on us to do the right thing.

Reputation in our markets

It supports our reputation in the market and the communities we operate in, as a business and an employer



Safety

We care about the safety of our colleagues and everyone we deal with, and focus on people, product and process safety.

- We follow the safety rules and procedures
- We follow the Life-Saving Rules
- We stop work if behavior or conditions are unsafe
- We develop, test, make and distribute products safely
- We report safety concerns immediately

“Safety is the purpose of our work”

Mark van den Heuvel
accountmanager Primaverde



Safety

Our goal is to achieve zero injuries and serious incidents. We do this by applying consistent and leading standards in people, product and process safety. Whatever the context, we are committed to complying with safety-related laws, and we all play our part in the company's safety performance.

People safety

We are all responsible for health and safety. We are committed to running our operations safely by providing the equipment, procedures and training to prevent injuries. Whether we are at work, visiting customers or traveling, we follow safety rules and procedures at all times. We report injuries and safety incidents to continuously improve our safety performance.

Product safety

Product safety covers regulatory compliance, protecting people from exposure to hazards and management of hazardous substances. We apply our expertise to responsibly

manage the health, safety and environmental aspects of a product throughout its life-cycle. We label products properly and communicate product-handling requirements well, often over and above any legal requirements to do so.

Process safety

Process safety management is a systematic way to assess, manage and communicate the operational risks of injuries, waste or harm that may result from the work we do. This includes hazards associated with our research, manufacturing and transport activities. Safe methods of work are a license to operate.

We follow local process safety procedures, and we identify and report any risks promptly, so that we can control the risks and continuously improve on our safety performance.

Life saving rules

We support our life-saving rules with our core value 'A Clean and Safe Way to Work'. We must always stop work if conditions or behavior are unsafe. The life-saving rules apply to us all. We apply zero tolerance to breaches of the life-saving rules. risks and continuously improve on our safety performance.

These are our life-saving rules to protect us while carrying out work with a higher safety risk.

- *Work with a valid work permit when required*
- *Use personal safety products such as helmets, safety goggles and safety gloves if required or if the situation calls for it*
- *Obtain a permit for entry into a confined space*
- *Make sure moving machinery is guarded*
- *Check equipment is isolated before work begins*
- *Obtain authorization before disabling safety equipment*
- *Wear a seatbelt in motor vehicles when provided*
- *Do not use alcohol or drugs at work*

**Clean and
safe way
to work**

Integrity

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- We communicate in a professional way

“Integrity forms the base of our safe and clean way to work”

Robert Furgler
CEO Primaverde



Integrity

Our individual and collective behavior shapes the opinions of everyone we deal with. Because of this we act in a fair and honest way, complying with all laws and regulations wherever we operate. We all contribute to safeguarding the company's integrity and reputation.

Honest business conduct

We are committed to applying the highest ethical and legal standards. We conduct business fairly and with integrity. We don't make, offer or authorize bribes or conduct any other form of unethical business practice. We do not make facilitation payments. We believe in competing on the merits of our products.

We each have a responsibility to ensure that we base our dealings with business partners on objective decisions and are not influenced by gifts or entertainment. All gifts and entertainment given or received must be of modest value and

appropriate to the business relationship. We seek approval for our actions.

Fair competition

We support free and fair competition. We aim to meet our customers' needs faster, better and more distinctively than our competitors. So we compete hard, but fairly, within the framework of competition laws. We maintain a policy of strict compliance with competition laws and our own rules. We do not enter into agreements and practices that would have a detrimental effect on competition, such as price-fixing, market allocation or abuse of dominant

position. We promote our products in a fair and balanced way, with information that has been approved through our internal marketing review procedures.

Trade controls

We conduct international business in a world that has trade restrictions. Some countries have trade controls that restrict certain business transactions and movement of goods across borders. We comply with all trade controls applicable to our business, and provide accurate and truthful information about our business to Customs and other relevant authorities.

Primaverde was founded in 2009 and has built up an excellent reputation with its brands:

- PrimaCover
- Curtain-Wall
- FugenMeister
- Ram Board

We bring these to the market through our customers, which are wholesalers and distributors. We support our sales channels.



Confidential information

It is vital that we safeguard the company's intellectual property and confidential information. This includes business strategies, technical know-how, financial information, customer lists and passwords. We protect confidential information against unauthorized disclosure to avoid destruction of the value of our assets and damage to our business operations and reputation.

We also respect the intellectual property of others. We protect confidential information provided to us and only use it if we have obtained permission to do so.

Personal data

We are committed to protecting the personal data of employees, customers and business partners. We follow applicable laws and our own set of privacy rules which ensure that we treat personal data with a high level of care. We abide by these rules to ensure that we keep personal data for legitimate business purposes, and that we are clear about when and how we collect, use or share personal data.

Avoiding conflicts of interest

We each have a responsibility to make decisions in the company's best interests, and we understand that our decisions at work must not be influenced by personal

or private considerations. If a potential conflict may exist or may appear to exist, we discuss it with our manager. We can take part in political and democratic processes in our personal capacity. We separate professional and political interests. As a company, we do not provide financial or other support to political parties or political campaign efforts.

Company resources

It is important to protect the company's property, resources and information systems and ensure that they are kept secure at all times. We use these assets



appropriately and responsibly, and protect them against loss, damage or misuse. We take care to use assets and resources for their intended business purpose.

Record keeping

We each have a duty to ensure that the records we keep related to our business activities are accurate, complete and up to date. Efficient and accurate records management is essential for the protection of the company's business interests. We follow internal rules and guidelines when creating documents and ensure that we keep records safely or destroy them in accordance with relevant document retention policies.

Preventing fraud

We have a set of comprehensive business controls in place to prevent fraud. We follow all internal approval processes and accounting and financial reporting principles to ensure that we properly record all transactions and to ensure that they are subject to review where appropriate. We abide by anti-money laundering laws to prevent any use of the company's resources to conceal crimes. We are alert to threats of fraud, and we report any suspicious transactions or activity immediately.

Proper communication

We are committed to communicating in an open, factual and timely way, while following all legal and business obligations. To be sure that we comply with the law and protect the company's interests, we refer media enquiries to people who are authorized to speak on behalf of the company. We each carefully consider our business communications, regardless of the method we use to communicate, and ensure that they meet high standards. We each use discretion and common sense when we use social media and follow the company's guidelines at all times.

Sustainability

We care about our environment, our colleagues, our business partners and the communities we operate in.

- We recognize human rights and treat people with dignity and respect
- We recruit and manage employees fairly.
- We reduce the environmental impact of what we do
- We address the concerns of those affected by our operations
- We give back to communities we operate in
- We work with business partners who share our values

“Protecting people and working environments is just one of the many ways we attribute to sustainability”

Wouter Berkelmans
backoffice Primaverde



Sustainability

If we are to leave a healthy planet for future generations, we must strive for more sustainability in all of our endeavours. That means working with customers and suppliers to develop leading solutions that do more with fewer resources. It also means continuously developing ourselves and our colleagues. We each play our part in creating an engaging place to work and contributing to the company's sustainability success.

Human rights

We recognize the human rights of all people as outlined in the Universal Declaration on Human Rights and the UN Guiding Principles on Business and Human Rights. We take responsibility for avoiding infringement of human rights and for remediating the impact on human rights resulting from our activities and our products and from the activities that our business partners conduct for us.

We expect our business partners to apply equivalent values and actively support them in their

implementation where needed. We encourage our colleagues, business partners and people affected by our activities or products to raise complaints and grievances about any potential human rights impact or breach of our Code. We address these complaints and grievances fairly, in confidence and in accordance with laws.

We are committed to continuous improvement in order to remain an attractive employer, business partner and member of the communities in which we operate.

Employment relationships

We hire the best people for the job based on equality of opportunity and encourage them to develop personally and professionally. We provide the right conditions for our colleagues to thrive and develop, and we each commit to our own continuous personal development.

We apply the principles of the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work. We do not employ people against their will or deprive them of their rights. We adhere to the legal minimum

Primaverde BV has an extensive range of reliable products for a clean and safe way to work.

Our product range is developed with attention and knowledge and consists of protective non-wovens, protective films, dust barrier systems, dust doors, tapes and tools.



age requirements as outlined in the relevant ILO conventions and the laws of the countries we operate in, and we do not employ children under the age of 16.

We treat people with dignity and respect, and we support diversity. We don't harass or discriminate, whether through culture, nationality, race, religion, gender, disability, association, sexual orientation or age.

We ensure that working hours and remuneration comply with laws and are fair and just. We respect individual rights to freedom of opinion and association, and we respect the right to collective bargaining and co-determination.

If we are to leave a healthy planet for future generations, we must

strive for more sustainability in all of our endeavours. That means working with customers and suppliers to develop leading solutions that do more with fewer resources.

It also means continuously developing ourselves and our colleagues. We each play our part in creating an engaging place to work and contributing to the company's sustainability success.

The environment and the community

We are committed to comply with all environmental laws and regulations in every country we operate in. We focus on reducing our environmental footprint by lowering our carbon emissions, using less energy and creating

less waste in our activities. We develop environmentally friendly technologies and work closely with our business partners to do more with less in an environmentally responsible way.

We fully understand our role and responsibilities when it comes to society and contributing to the communities we operate in. Whenever possible, we make a positive difference to the world around us, engaging with people and organizations to help bring Primaverde and its brands to life while supporting deserving and sustainable projects and causes, using our products when appropriate. We are each encouraged to get involved in community activities, as long it doesn't lead to a conflict of interest.



Stakeholder relationships

We engage with our customers to understand their markets and needs. We have a transparent and unbiased dialog with our key financial, social and environmental stakeholders and use knowledge from this dialog to develop leading sustainability solutions.

Business relationships

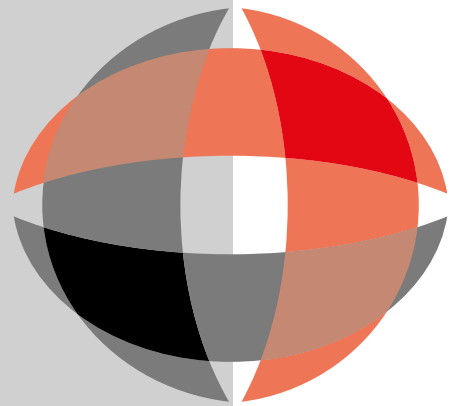
We wish to do business with partners whose ethical, social and environmental standards are consistent with our own. We use these standards to decide whether to enter or continue relationships with business partners. We expect our business partners to confirm that they conduct their business in accordance with our Business Partner Code of Conduct.



Integrity • Safety • Sustainability

Product development
& procurement

Market behaviour
& interacting with people



Passion for protecting
people and materials

Precise
procedures

Commitment and
powerful performance

Proud employees
and proud customers

It's about doing the right thing

Our Code sets out the high standards of behavior expected of us at all times. Everyone who works for Primaverde must comply with the Code and the underlying policies, rules and procedures. If any provision of the Code conflicts with the law, the law prevails. When in doubt, we should contact our manager or the legal department.

Taking time to think

We're sometimes faced with situations where there is no obvious answer. If we are unsure what to do, we should stop and ask ourselves:

- Do I understand the risks and implications?
- Is this legal?
- Does it follow our Code?
- Is it fair and honest?
- Will it reflect well on me and the company?
- Would I feel okay if this appears in the news?

If the answer to any of these questions is "no", we should not do it. If we are unsure, we should seek guidance from our manager, HR or our Compliance Officer.

Raising concerns

If we believe that our Code is being, or is about to be, breached, we should take action. We can:

- Talk to the person involved
- Talk to our manager, HR business partner or the Compliance officer
- Share your questions or concerns

What is expected of us?

- Follow the law and our Code
- Stand for our values and guide others
- Report any breaches



Share your questions

A breach or a concern can be reported to Primaverde in three ways.

Make a call

An operator will listen to your concerns and ask questions.
The helpline can be answered in Dutch, English, German or French.
Call Primaverde at +31 (0)416 820282.

Send an e-mail

A report can be sent to
codeofconduct@primaverde.com

Send a letter

You can send a letter to
Primaverde BV
attn. Annemiek Loonen Furgler
Industrieweg 22a
5145 PV Waalwijk
The Netherlands

Reports will be treated confidentially. Reports can be submitted anonymously, although disclosure of identity is encouraged to facilitate the investigation. Primaverde encourages open dialog and takes every report seriously. There are no repercussions for reporting a breach of the Code in good faith, even if the report is unfounded. We all have a responsibility to do the right thing.

