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## **DE RIJKE – POLICY ON SENSITIVE TRANSACTIONS**

### **1. GOAL**

The purpose of this policy is to ensure that business gifts are given and received in an appropriate and ethical manner. This policy on sensitive transactions must safeguard the integrity of de Rijke Group and ensure that there are no conflicts of interest, bribery or inappropriate influence.

### **2. WHAT ARE SENSITIVE TRANSACTIONS?**

Sensitive transactions are usually in the nature of kickbacks, business gifts or invitations of significant value, bribes or payoffs made to favorably influence some decision affecting a company's business or for the personal gain of an individual or their family.

Business gifts include all gifts given to or received from customers, partners, suppliers and other business relations.

### **3. COMPLIANCE WITH (INTERNATIONAL) LAWS & REGULATIONS**

The De Rijke Group seeks to promote distinct and unambiguous ethical standards in any area of business. We strive to provide a secure and moral workplace for all our employees. As a family-owned company, we anticipate that everyone will act respectfully and in compliance with the law's minimal standards.

### **4. POLICY**

Our policy prohibits the company and its employees from corruptly offering or giving anything of significant value to business relations. The criteria for significant business gifts or invitations is € 150.

It is not permitted to give anything to government officials, politicians or an official of a public international organization as this can be considered bribery.

In other cases, giving modest business gifts and entertainment is permitted, but only if it meets the following conditions:

- it should not influence the recipient's business decision;
- it is in context of a normal good cooperative relationship;
- it is not frequent;

- it must not affect the integrity of De Rijke Group;
- it may not conflict with any laws and regulations;
- giving money or vouchers is not permitted;
- gifts with a value exceeding € 150 may not be given without prior approval from management.

In addition, we operate the principle that for business gifts and invitations we receive, the same standards apply as for gifts and invitations we are permitted to give.

Employees who regularly receive non material business gifts or similar gratuities due to their many external contacts are required to inform the Board of Directors and may be required to hand these over.

## **5. REPORT AND APPROVAL OF A SENSITIVE TRANSACTION**

Business gifts or similar gratuities with a value exceeding € 150 and other transactions that could be perceived or implied as favors, should be reported and may not be given or received without prior approval from the Board of Directors.

## **6. CONCERNS**

Colleagues who have any concerns about an employee's decision making on business gifts and hospitality should raise them for further investigation. The arrangement on how to act/report by misconduct and whistleblower protection can be found on our [website](#).

## **7. ENFORCEMENT**

Everyone within the Company is responsible for adhering to this policy. Management is responsible for enforcing this policy. Staff who fail to comply with the provisions of the Sensitive Transactions Policy may be subject to disciplinary action, potentially leading to dismissal.

## **8. QUESTIONS**

All questions regarding sensitive transactions should be directed to the Board of Directors.