



## **Code of Conduct – Holland Colours Group**

### **Foreword**

Apeldoorn, 31 October 2025

Since its foundation in 1979, Holland Colours N.V. ('Holland Colours') has grown into an organization in which the core values of Cooperation, Responsibility, Passion, and Courage are firmly embedded. Thanks to these values and your dedication and commitment, we have built an international and innovative organization together that we can be very proud of.

The world around us is changing rapidly, resulting in far-reaching developments and numerous uncertainties at national and international level, which also has consequences for Holland Colours. Globally, we will continue to work together to build a future-proof company, with sustainability as a key pillar and an integral part of our daily practice.

We have drawn up this Code of Conduct ('Code') to make it clear to everyone what we stand for and how we want to work together in accordance with the Holland Colours values. The Code applies to everyone who performs work for Holland Colours and forms part of your agreement with Holland Colours. Wherever 'Holland Colours' appears in the text, we also mean the subsidiaries of Holland Colours.

If you have any questions about the content, please let us know immediately. Discuss this with your team, manager, the Legal Affairs department, the Management Team, your Head of Division, or the Board of Management of Holland Colours NV. You can do this in a way and at a location that feels comfortable for you.

The contribution and involvement of every employee are key to the future of Holland Colours!

Yours sincerely,

#### **Board of Management Holland Colours NV**

Coen Vinke (CEO)  
Eelco van Hamersveld (CTO)  
Martijn Klomp (CFO)

#### **Heads of Division**

Egbert Boerrigter (Europe)  
Joe Gleeson (Americas)  
Florian Balogh (Asia)

## Integrity

At Holland Colours, honest and trustworthy conduct is paramount. We expect everyone to comply with this. Among other things, this means:

1. **Bribes** are not permitted in any way, shape or form.
2. **Conflicts of Interest** between private finances and business dealings are not permitted.
3. **All Business Transactions** on behalf of Holland Colours must be recorded correctly and carefully as per our internal procedures. Transactions may be audited by Holland Colours or an external auditor.
4. **Confidential Information** of Holland Colours' customers, employees and partners must be protected and may not be shared with others without permission.

## Fraud and Conflicts of Interest

Holland Colours has a zero-tolerance policy towards fraud. Fraud includes, but is not limited to: deliberately falsifying data, manipulating reports or financial information, unlawfully obtaining resources or benefits, and deliberately misleading colleagues, customers, suppliers or other stakeholders for personal or business gain.

It is not permitted to unjustly benefit or attempt to benefit oneself or others in a manner that could harm Holland Colours financially or in any other way. For example, in the areas of reputation, safety, health or the environment.

Do not make decisions if there is, or might be, a conflict of interest, and do not attempt to influence such decisions.

Everyone is obliged to immediately report suspected or actual fraud or attempts thereof and potential or actual conflicts of interest via IntegrityLog, to their own manager, the Legal Affairs department or the Board of Management, and to cooperate in investigations into possible fraud.

## Bribery, Benefits and Gifts

Holland Colours rejects any form of bribery. It is not permitted to give or promise benefits in order to obtain a business advantage that would not otherwise have been granted.

Everyone is obliged to report potential or actual cases of bribery immediately via IntegrityLog, to their own manager, the Legal Affairs department or the Board of Management.

Giving or accepting gifts is permitted up to a **maximum value of €50 per occasion** and **€100 per year**, or the equivalent in local currency. Only the Chief Executive Officer or the Head of Division may grant permission to deviate from this rule.

### **Fair Competition**

Holland Colours stands for fair competition. This means that you are not permitted to engage in activities that potentially or actually conflict with the interests of Holland Colours or hinder or might hinder the performance of your own duties.

It is not permitted to use Holland Colours' corporate resources and information or those of your own position for personal gain or to compete with Holland Colours.

### **Use of Corporate Resources**

Everyone must handle Holland Colours' corporate resources, such as tools, materials and information (e.g. intellectual property), with care. Prevent misuse, damage, and theft.

Corporate resources may only be used for business purposes. Use and lending are only permitted with the permission of your supervisor.

### **Confidential Information**

Everyone at Holland Colours must be aware that confidential information must be protected. This applies to company data, customer data, personnel information and other non-public information, among other things.

Only share information if it is necessary and you are authorized to do so. Never use confidential information for personal purposes. When sharing information, you must comply with the law. This obligation remains in force even after the end of your employment.

### **Listed on the Stock Exchange**

No securities transactions (such as buying or selling shares) may be conducted on the basis of confidential company information.

Holland Colours shares are partially listed on the stock exchange. This means that specific legislation applies to the handling of sensitive information. You can read more about this in the **Insider Dealing Policy**, which can be found on our website.

### **Accurate Reporting**

Holland Colours attaches great importance to ensuring that all financial reports and sustainability reports are complete, clear and factually correct. Everyone involved in the preparation of reports is expected to exercise great care.

The administration of Holland Colours must comply with applicable laws and regulations at all times. Reports must not contain any incorrect or misleading information. Every transaction must be clearly documented.

## **Corporate Governance**

Policies, procedures, and responsibilities are designed to help us achieve our goals in a responsible manner. Everyone has their own responsibilities and powers and acts accordingly and in accordance with the applicable guidelines.

We expect managers to demonstrate responsible leadership and to act as role models in terms of integrity, responsibility and transparency.

## **Health & Safety**

We strive to provide every employee with a healthy and safe workplace. As such, Holland Colours takes measures to limit potential risks where necessary. The health, safety and environmental policy is continuously updated and complies with applicable laws and regulations.

We expect everyone to be aware of the policy – including the 10 safety rules – and to adhere to it.

## **Social Engagement and Sustainability**

Holland Colours supports various societal projects and encourages everyone to actively contribute to them.

Sustainability is the responsibility of everyone who works at Holland Colours. Our goal is to minimize the consumption of water, energy and raw materials, as well as the associated CO<sub>2</sub> emissions and waste production, per kilogram of product produced.

## **Respect and Equal Treatment**

At Holland Colours, we work together. We invest in well-being, safety, diversity, equal opportunities and personal development.

We offer an open and pleasant working atmosphere based on mutual respect. Holland Colours stands for equal treatment and rejects discrimination and harassment.

If employees fail to comply with this, Holland Colours will immediately take appropriate measures. Unwanted behaviour is taken seriously and leads to action.

## **Confidential Advisor**

Holland Colours' policy is aimed at providing everyone with a safe, healthy and pleasant working environment. If an employee nevertheless feels unsafe or encounters potentially inappropriate behaviour, they may submit a complaint to the local trusted representative or via **IntegrityLog** on our intranet. This last option offers the possibility of submitting anonymous reports.

Every report is handled carefully, discreetly and in accordance with applicable privacy guidelines.

### **Responsible Employment Practices**

Child labor and forced labor are not tolerated.

Every employee receives a competitive salary. Recruitment and promotion are based on knowledge, skills and experience.

### **Deviation, Priority and Measures**

This Code forms part of everyone's agreement with Holland Colours. Should the content of the Code deviate from national or international legislation and regulations applicable to Holland Colours, then such legislation and regulations shall prevail. If the content of the Code deviates from individually made agreements, the latter shall apply, provided they are in accordance with applicable legislation and regulation.

Questions about the Code may be submitted to your line manager, the Legal Affairs department or the Board of Management.

If you knowingly act in violation of this Code, measures may be taken, such as suspension, dismissal or immediate termination of an agreement with Holland Colours. Depending on the circumstances, failure to report a situation in which this is required or desirable under the Code might also give rise to measures being taken.

### **Adoption and Amendment**

This Code has been adopted by the Board of Management. Amendments are made at the recommendation of the Holland Colours' Compliance Taskforce and after consultation with the *Vertrouwenscommissie* (Workers' Council in Apeldoorn).

The new version is applicable to all employees from the date it is published on intranet. Once this version is published, the old version will become invalid.