

CONFIDENTIALITY

All personnel of CERTIFER HHC/DRS B.V. (hereinafter CERTIFER HHC/DRS) are obliged to refrain from monetising confidential information that one has at his/her disposal in the exercise of their (inspection) tasks and of which it is to be expected that the disclosure thereof will significantly influence the degree of integrity of CERTIFER HHC/DRS. Non-disclosure of this type of confidential information is also mandatory. This obligation has also been included in articles 272 and 273 of the Dutch Penal Code (Wetboek van Strafrecht).

In order to appropriately follow this policy, each member of personnel has signed a copy of “Code of Conduct - Employees” (D022a). In addition, the suppliers who have access to the processes and related data due to their service have signed a “Code of Conduct - Suppliers” (D022b).

This is regulated directly at the time of hiring of the staff member to exclude all possible forms of alleged risk with regard to the prohibition of the abuse of confidential information (insider information) obtained. Their ancillary activities, among other things, are inventoried (by means of a form D022c) that are used for the purpose of a risk inventory and evaluation. The executive pays attention to this subject in the annual evaluation meetings with the staff.

If CERTIFER HHC/DRS is legally required or, through contractual obligations, authorised to release confidential information, the party concerned will be informed about the information provided unless prevented by law.

Information of the client, which has been obtained via other sources than the client, is treated confidentially as well.

The timeliness and application of this procedure is evaluated annually by the Managing Director.