Van Aarsen Code of Conduct

September 2026

People • Quality • Environment • Integrity

Revised edition — September 2026

Acting with integrity. Working safely. Doing business responsibly.

Message from the Management Team

Van Aarsen is a unique company and an essential link in the food chain. Quality, safety and innovation are central to everything we do. Our mission is to be a worldwide leading supplier of machinery and installations for the production of animal feed, pet food and fish feed, from concept to completion. Within our company, we continuously strive to optimise our operations. To keep improving our performance in a rapidly changing world, it is important that we remain true to our core values.

The following core values form the foundation of this Code of Conduct:

- People
- Quality
- Environment
- Integrity

Our Code of Conduct sets out our core values and key policy principles. It provides guidance for everyone acting for or on behalf of Van Aarsen and aims to promote appropriate conduct and integrity within the company. The values, standards and behavioural guidelines set out in this Code of Conduct must be always complied with.

Good relationships with our stakeholders are one of the keys to our success. We encourage everyone acting for or on behalf of Van Aarsen to help establish and maintain these relationships. We communicate with employees, customers, suppliers, business partners, public authorities and other stakeholders with integrity and respect.

This Code of Conduct cannot cover every specific situation. We therefore expect everyone acting for or on behalf of Van Aarsen to consider carefully what is right and to raise or report questions, concerns or suspected breaches in a timely manner. Reports are handled with care and as confidentially as possible. Van Aarsen does not tolerate detrimental treatment or retaliation against anyone who makes a report in good faith or cooperates with an investigation.

Questions about this Code of Conduct or reports of a possible breach may be submitted through Van Aarsen's designated reporting channels, including the compliance contact point. Up-to-date contact details are made available both internally and externally.

The Management Team of Van Aarsen

People

Discrimination and equal opportunities

We provide all employees with equal employment opportunities. At Van Aarsen, we are:

- committed to ensuring that recruitment, selection and personnel policies do not involve unlawful discrimination on grounds including race, colour, ethnic origin, religion, nationality, sex, sexual orientation, age, physical ability, state of health, political or social opinion, trade union membership, marital status or any other ground protected by applicable law.
- committed to a workplace where teamwork matters and everyone feels valued and respected.

Human rights

At Van Aarsen, we support the protection of internationally recognised human rights. We strive to prevent violations of these rights within our operations or supply chains. We are committed to:

- not participating in or benefiting from any form of forced labour.
- not participating in or benefiting from any form of child labour.
- paying employees at least in accordance with applicable legal and industry requirements.
- not doing business with parties when we know that they commit serious human rights violations, and taking appropriate action when risks are identified.

Terms of employment, respect and safety

Every employee has the right to work in an environment free from violence, intimidation, discrimination, bullying and other unacceptable behaviour. We want to ensure that everyone returns home safely from work every day. Therefore:

- we require work to be carried out safely and safety rules to be observed.
- we do not tolerate intimidation, discrimination, bullying, sexual harassment, threats, violence or other unacceptable behaviour.
- we prohibit the use or misuse of alcohol, drugs and other substances where this may threaten safety, health or productivity.
- we ensure that terms of employment, including holidays, working hours and leave, comply with applicable legal and industry requirements.
- we invest in resources that help employees develop and realise their potential.
- we assess health and safety risks and take appropriate measures to eliminate or reduce them.

Quality

Outstanding quality is one of Van Aarsen's firmly held principles. We deliver high-quality products and services that comply with applicable regulations, standards and agreed requirements. In doing so, we follow these principles:

- we are fully committed to delivering products and services that meet applicable quality requirements and can be used safely.
- we comply with applicable international standards and legal requirements.
- employees use effective processes to measure and record product and process performance, and take preventive or corrective measures where necessary.
- we report quality and safety issues in a timely manner and do not conceal shortcomings.

Environment

Environmental responsibility

Van Aarsen places great importance on the environment. Within our capabilities, we contribute to reducing our environmental impact. We follow these guidelines:

- as a minimum, we comply with applicable legal requirements and take relevant stakeholder interests into account.
- we strive to minimise the environmental impact of our activities, production processes and end products.
- we strive for continuous improvement in our environmental performance and a reduction in our environmental impact.
- every employee is responsible for acting with due care for the environment; incidents and potential improvements are reported through the designated channels.

Social responsibility

Van Aarsen aims to contribute to society in a positive and responsible way. Van Aarsen:

- provides opportunities for learning and development, including work placements, traineeships and guided tours.
- supports appropriate social activities.
- strives to maintain good relationships with stakeholders and the local community through open, respectful and honest communication.

Integrity

Data privacy

We respect the privacy of employees, customers, suppliers and other business partners. We process personal data only for legitimate purposes and in accordance with applicable law. At Van Aarsen:

- we protect personal data, keep it up to date where necessary and retain it no longer than necessary or permitted.
- we restrict access to personal data to individuals with the appropriate authorisation and a legitimate business reason.
- we use personal data solely for permitted business, contractual or legal purposes.
- we report potential privacy incidents immediately through the designated channels.

Cybersecurity and information security

Information and digital systems are essential to our business operations. Everyone at Van Aarsen is responsible for handling company information, personal data and company systems with due care. We protect information against unauthorised access, loss, misuse, alteration and disclosure.

- we use company information, systems and equipment safely, responsibly and solely for authorised purposes.
- we keep passwords, access codes and other security credentials confidential.
- we remain alert to phishing, fraud, social engineering and other forms of cybercrime, and report suspicious situations immediately.
- we share confidential or sensitive information only with authorised individuals and take appropriate measures when exchanging it externally.
- we do not install software, applications or other tools for business use without the required permission.

Responsible use of artificial intelligence

At Van Aarsen, we use AI responsibly, safely and transparently. Employees:

- use only AI tools approved by Van Aarsen for business purposes.
- do not enter confidential company information, personal data, customer information, technical information or other sensitive information into unapproved AI systems.
- remain personally responsible for the accuracy, quality and suitability of AI-generated information.
- check AI output before it is used for business decisions, communications, technical applications or financial reporting.
- do not use AI to circumvent security, privacy, intellectual property or other legal and internal obligations, and seek prior approval where required for higher-risk applications.

Confidential information and intellectual property

Information, knowledge and intellectual property are important assets of Van Aarsen. These include technical drawings, designs, software, cost calculations, pricing information, quotations, customer and supplier data, business strategies, know-how and trade secrets.

- we protect confidential information and intellectual property against loss, misuse and unauthorised disclosure.
- we share confidential information only with individuals who need it for their work and are authorised to receive it.
- we also respect the confidential information and intellectual property rights of third parties.
- we use confidential information solely for legitimate business purposes.
- our duty of confidentiality continues after an employment or business relationship has ended, insofar as applicable.

Use of company assets

Van Aarsen provides company assets to enable work to be carried out properly and safely. We handle machinery, tools, vehicles, computers, telephones, software, means of payment and other Van Aarsen property with care and responsibility. Theft, fraud, deliberate damage, unauthorised use and other misuse are not tolerated.

Fraud prevention and accurate records

Van Aarsen does not tolerate fraudulent conduct. This includes theft, deception, falsifying invoices or other documents, inaccurate expense claims and dishonest transactions. Reliable business information is essential for sound decision-making and the trust of our stakeholders.

- we record transactions, costs, expense claims, hours worked and other business data completely, accurately and promptly.
- we do not create or use false, misleading or deliberately incomplete documents.
- we do not maintain unrecorded accounts, funds, assets or transactions.
- we retain and destroy documents in accordance with applicable statutory and internal retention periods.
- we cooperate fully and honestly with internal and external audits and investigations.

Conflicts of interest

We avoid situations in which personal interests could improperly influence our business judgement, as well as the appearance of such situations. Employees inform their manager promptly and fully when personal relationships, external activities, financial interests or other circumstances could influence their decision-making on behalf of Van Aarsen. Prior permission is sought, in accordance with the applicable internal rules, for outside activities that could potentially affect Van Aarsen’s business interests.

Gifts and hospitality

Gifts, meals, invitations and other forms of hospitality must never be used to improperly influence business decisions or create the impression of doing so.

- gifts and hospitality have a legitimate business purpose and are reasonable and appropriate.
- they are not offered or accepted in exchange for a business advantage and do not consist of cash or cash equivalents.
- applicable internal approval and registration requirements are observed.
- additional restrictions apply to public officials; where there is any doubt, advice or permission is sought in advance.
- gifts received are handled in accordance with Van Aarsen's applicable arrangements.

Corruption and bribery

Van Aarsen does not tolerate any form of corruption or bribery, whether directly or through third parties. We do not offer, promise, give, request or accept money, gifts, services, benefits or anything else of value where these are intended, or could be perceived, to improperly influence a business decision.

- we do not pay or accept bribes, kickbacks or other improper payments.
- we do not make facilitation payments to expedite routine government actions, except where payment is necessary to avert an immediate threat to health or safety; any such situation is reported immediately and recorded accurately.
- we exercise particular care in dealings with public authorities and public officials.
- we work only with trustworthy third parties and, where appropriate, assess integrity and corruption risks relating to agents, distributors, consultants and other business partners in advance.
- we expect business partners to act in accordance with the principles of this Code of Conduct relevant to them, and take appropriate measures when wrongdoing is identified.

Fair competition

We conduct business fairly and comply with applicable competition law. It is not permitted to enter into prohibited agreements with competitors concerning prices, customers, markets, production, tenders or other competitively sensitive matters, or otherwise to restrict competition unlawfully.

Competitive intelligence is obtained and used only by lawful means. Where there is any doubt about contact with competitors or the exchange of information, legal advice is sought in advance.

International law, sanctions and export controls

Van Aarsen complies with applicable laws and regulations in the countries where we do business. We comply with applicable export control, import and sanctions rules, and carry out appropriate checks on transactions and business partners where required.

- where required, we check whether parties, countries, goods, software, technology or end use are subject to applicable sanctions or export restrictions.
- we ensure that the required licences, authorisations and documentation are in place before goods, software or technology are imported, exported or transferred.
- we do not attempt to circumvent sanctions or export control rules, either directly or through third parties.
- we seek legal or compliance advice as soon as there is any doubt about sanctions, import or export controls.

Money laundering and terrorist financing

Van Aarsen is committed to complying with applicable national and international laws and regulations on money laundering and terrorist financing. We do business with legitimate business partners and

remain alert to unusual payments, arrangements or transactions. Suspicious situations are reported in a timely manner through the designated channels.

Business commitments

Honest communication, mutual respect and honouring agreements are crucial to lasting business relationships. Therefore:

- we conduct business honestly and transparently.
- we honour business agreements and communicate unexpected events proactively, promptly and openly.
- we record transactions accurately.
- we work with suppliers and other business partners to promote business conduct consistent with the relevant principles of this Code of Conduct.

Compliance with the Code of Conduct

Questions and ethical dilemmas

A code of conduct cannot cover every possible situation. When we are uncertain about a decision or action, we ask ourselves questions including the following:

- Is it legally permitted?
- Is it consistent with this Code of Conduct and Van Aarsen's core values?
- Is it honest, safe and consistent with acting with integrity?
- Have I taken sufficient account of the interests and safety of others?
- Would I feel comfortable if my decision were made public?
- Can I explain my decision without reservation to colleagues, my manager, a customer or my family?

If the answer to any of these questions is no, or if doubt remains, we stop and seek advice before acting.

Raising questions, concerns and possible breaches

Van Aarsen promotes an open culture in which questions, concerns and possible breaches can be discussed. Anyone who suspects in good faith that conduct is inconsistent with this Code of Conduct, internal rules or applicable laws and regulations is encouraged to report it as soon as possible.

Depending on the situation, a question, concern or possible breach may be discussed with or reported to the immediate manager, another appropriate manager, a designated confidential adviser or compliance function, or through Van Aarsen's official reporting channel. If a report concerns the immediate manager, or someone does not feel comfortable reporting to them, another available reporting channel may be used.

Van Aarsen handles reports with care and as confidentially as possible. Information is shared only with individuals who need it for a thorough assessment or follow-up, in accordance with applicable law.

No retaliation

Van Aarsen does not tolerate any form of detrimental treatment or retaliation against anyone who, in good faith, asks a question, raises a concern, reports a possible breach or cooperates with an investigation. Retaliation includes threats, intimidation, discrimination, adverse changes to terms of employment or career opportunities, and other detrimental treatment resulting from a report. Suspected retaliation must also be reported.

Knowingly making a report that a person knows to be false is not covered by this protection and may itself breach this Code of Conduct.

Investigation and follow-up

Reports of possible breaches are assessed carefully, objectively and appropriately. Further investigation is carried out where necessary. Everyone involved in an investigation cooperates fully and honestly, keeps relevant information available and respects the required confidentiality. Van Aarsen takes appropriate measures when a breach is established and strives to prevent recurrence.

Responsibilities of managers

Everyone at Van Aarsen is responsible for complying with this Code of Conduct. In addition, we expect managers to lead by example, help employees understand the Code, create a safe environment for questions and reports, refer reports with due care and not allow retaliation.

Breaches and measures

Breaches of this Code of Conduct, applicable internal rules or laws and regulations are taken seriously and may result in appropriate corrective or disciplinary measures. Depending on their nature and seriousness, breaches may have consequences under employment law or contracts. Where legally required or appropriate, Van Aarsen may report a breach to the competent authorities.

Responsibility and periodic review

The Management of Van Aarsen endorses this Code of Conduct and is responsible for promoting a corporate culture of integrity. The Code of Conduct is reviewed periodically and, where necessary, updated to reflect developments within Van Aarsen, applicable laws and regulations, and relevant social and technological developments.

Everyone acting for or on behalf of Van Aarsen is expected to familiarise themselves with the sections of this Code of Conduct applicable to them and to comply with them in their day-to-day work.