



Roto Smeets Group

Roto Smeets Group CODE OF CONDUCT

Values

Integrity

All our business activities are based on integrity. Everybody who has dealings with Roto Smeets Group, internally and externally, can rely on being treated respectfully, fairly and justly.

Proficiency and service

We are proud of our proficiency and the skill with which our employees exercise this proficiency in their everyday work. Our employees must be aware that Roto Smeets Group can achieve its objectives only by offering customers and suppliers the best standard of service. This service-minded approach is the cornerstone of Roto Smeets Group's vision of doing business.

Sustainability

Our most important goal is to run a profitable, growing and sustainable business. It is essential to maintain a balance in our short-term and long-term objectives and to avoid causing damage to people and the environment.

These values are fundamentally important to the way Roto Smeets Group runs its business and they are the foundations for all our business decisions.

Guidelines

General

Human rights and discrimination

We respect human rights and comply with all legislation in this field. We reject any form of intimidation or discrimination on the grounds of race, age, gender, skin colour, sexual preference, religious beliefs, disability or country of origin. Besides our own employees, we expect other parties involved with Roto Smeets Group - including temporary workers, customers, suppliers and visitors - to refrain from any form of discrimination and to respect the human rights of other people.

Equal opportunities and working conditions

We are committed to offering all employees equal opportunities. All work-related decisions - including recruitment, promotions, transfers, dismissals, disciplinary measures, compensations and payments - are taken solely on the basis of the qualifications and skills needed for the position concerned.

Every relationship with and between employees must be built on respect for the individual. We strive to recruit, develop and retain proficient people and offer all employees a safe and healthy working environment. Our employees have a duty to take all reasonable measures to prevent injury and damage to themselves, their colleagues and the public at large.

Business

Conflicting interests

Our employees are not allowed to perform any business activities for competitors, customers, suppliers or other third parties without the explicit permission of the management of the operating company where they work. Our employees may not derive any personal gain from business opportunities related to our conduct of business and must avoid situations where their own interests may conflict with those of Roto Smeets Group.

Relationship management, gifts and corruption

We do business solely on the basis of the value and service we offer and we avoid unethical conduct. We recognise that business gifts and entertainment may be offered as part of building a normal business relationship. However, our employees must not accept any gifts of a nature that may cause the appearance of certain obligations being attached.

Our employees must make sure that their dealings with government officials are such that transactions cannot lead in any way whatsoever to any personal gain for those officials. Employees may not offer any business gifts or entertainment that could be construed as corruption, bribery or pay-offs. Under no circumstances whatsoever must any cash change hands.

Confidential information

Our employees must treat with the utmost confidentiality all information that they receive in connection with or during their employment. Employees who come into possession of confidential information that, if made public, could harm Roto Smeets Group in the short or long terms may not use such information for their own personal gain or that of others. Specific data concerning the financial position, production process, important contracts, acquisitions, disposals and mergers of Roto Smeets Group must always be treated confidentially. Similarly, information not in the public domain that could harm employees, customers or competitors, financially or otherwise, must be treated as confidential information.

Competition

Our employees must comply with all applicable international and national competition laws. They must refrain from holding impermissible discussions with competitors, exchanging sensitive information and engaging in other forms of illegal practices concerning competition.

Environment

We are committed to conducting business in a sustainable and environment-friendly way. We endeavour to ensure that our production processes have the least possible negative impact on people and the environment, but are nevertheless appropriate to our legitimate business needs. All our operating companies must comply with the prevailing legislation covering working conditions and the environment. We report on our environmental activities in a Socially Responsible Business report. When selecting paper

suppliers we consider matters such as renewable wood extraction and the registration of the origin of fibre-like material to be essential.

Political involvement

We do not support any political parties and do not contribute to the funding of groups whose activities are designed to promote party interests. In certain circumstances we may decide to provide financial support to local, non-partisan causes that are relevant to the community in which a certain subsidiary operates.

Compliance

All our employees must be familiar with and adhere to this code of conduct in their everyday work. Improper behaviour can damage the reputation of our company.

Each employee is personally responsible for complying with the code of conduct within Roto Smeets Group. Employees who have questions about the code or require advice on its correct application may contact their line manager. Employees should contact their operating company's human resources manager or the Roto Smeets Group compliance officer in the event of sensitive questions or problems that cannot be discussed with the line manager.

Raising questions about certain issues or practices, or reporting in good faith a suspected failure to comply properly with the code of conduct, shall not lead under any circumstances whatsoever to a negative approach towards the employee or have an adverse effect on his or her career.

The best assurance for correct compliance is for all employees to remain alert and collectively ensure that we conduct business ethically.