



## Statement regarding Code of Conduct

Dear (business) relation,

With this statement Hienfeld provides insight into the way we do business and how we have implemented the ethical and legal framework within which Hienfeld and all its employees must act.

Hienfeld operates as a financial service provider within a highly (self)regulated market and is a member of several (sector)associations, such as the Dutch Association of Insurers and the Netherlands Insurance Exchange Association. As a result, Hienfeld is and remains continuously up to date of all relevant (legal) developments within the insurance industry, share our vision and knowledge and conform to the applicable self-regulation.

Hienfeld has the necessary licenses of the Financial Markets Authority (AFM). Thereby Hienfeld is under the supervision of the AFM.

To monitor the integrity of the organization and its operations, Hienfeld also has an ISO certification, (policy) documents, regulations, procedures and a Code of Conduct. Both the content and enforcement thereof are periodically reviewed by both internal staff and external regulators and auditors. Below is an overview of the relevant control measures Hienfeld uses.

### Business operations

#### **Corruption, bribery and improper business behavior**

Hienfeld strives to achieve the highest standards of ethical behavior and does so by combating money laundering and bribery. Hienfeld prohibits bribery in any form, direct or indirect, regardless of the amount and employees must maintain the highest level of integrity. The Hienfeld anti bribery statement applies to every employee and encourages personal responsibility, oversight, integrity, accountability, leadership and transparency. Every employee is screened prior to employment and must adhere to the Hienfeld Code of Conduct.

#### **Competition**

Hienfeld does not enter into any agreement, arrangement or activity that could violate applicable competition laws and regulations.

#### **Trade Sanctions**

Hienfeld complies with relevant trade sanctions and screens its relationships to (inter)national sanctions lists.

#### **Data privacy / information security**

Hienfeld complies with all applicable data protection legislation. (Self)regulation applicable within Hienfeld includes: the Privacy Statement, the Protocol Right of Data Subject, the Data Breach Procedure and the Code of Conduct on Processing Personal Data Insurers. Hienfeld is also **ISO27001:2022** certified. The aim is to continuously ensure confidentiality, integrity, availability and information security of data.

### Human rights and working conditions

#### **Working conditions**

Hienfeld complies with the provisions of labor laws- and regulations. There is no place for child labor, forced labor, violation of the Working Hours Act, harassment and discrimination. Respect for individual and collective human rights is extremely important for Hienfeld.

The Hienfeld Personnel Manual contains the regulations and arrangements applicable to employees. In addition to fair remuneration, statutory and non-statutory vacations, much attention is paid to mental and physical health of employees. This is reflected in, among other things:

- a good (home) workplace;
- instructions on sitting posture and relaxation;
- vitality programs;
- anonymous surveys on happiness at work, productivity and vitality;
- company emergency service;
- A confidential advisor (internal and external);
- disability arrangements;
- whistleblower regulations

#### **Environment and climate**

Hienfeld complies with environmental laws and regulations and strives to minimize the adverse environmental and climate impact of its services. For transport, energy and paper use, Hienfeld has taken reduction measures. Affiliation is sought with industry-wide initiatives for further reduction(s).

Yours sincerely,  
W.A. Hienfeld B.V.

A handwritten signature in black ink, appearing to read "J. Matthes". The signature is written over a faint, light-colored rectangular stamp or watermark.

Johannes Matthes  
CCO/COO