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1. Purpose and application

AVR Afvalverwerking B.V. and RAV Water Treatment B.V. are the operating companies of AVR (hereinafter referred to as "AVR"), a mostly nationally operating waste treatment company with facilities in Rotterdam-Botlek, Rotterdam, Duiven, Utrecht and The Hague. AVR works with a large number of business partners and suppliers of products and/or services, hereinafter referred to as "Suppliers". The purpose of the AVR Supplier Code of Conduct is to establish ground rules and standards for all suppliers and business partners of AVR, which are necessary to promote the following:

1. Fair and ethical behaviour, including acting ethically in cases of existing or potential conflicts of interest between personal and professional relationships;
2. Full, fair, accurate, timely and understandable presentation of information in reports and documents intended for AVR and all other public communications in which AVR is mentioned.
3. Compliant with applicable laws and regulations and other applicable rules, codes and regulations.
4. Responsibility for complying with this code.
5. Immediate notification of any breach of this code.

AVR works with suppliers who adopt and comply with the ethical business standards and values set out in the AVR Supplier Code of Conduct, and expects them to actively promote these standards when dealing with their own staff and (sub-) suppliers. AVR encourages suppliers to further improve their own standards and practices, taking into account and respecting local traditions, cultures and norms. AVR expects suppliers to disseminate and teach the requirements of this Code of Conduct to employees, agents, subcontractors and (sub-) suppliers and hold them accountable for non-compliance.

AVR expects suppliers to periodically assess themselves and (sub-)suppliers for compliance and to share this compliance status with AVR upon request. If non-compliance with the AVR Supplier Code of Conduct is found, initially AVR will work with the supplier to improve the situation. If there is no visible improvement of the situation, AVR may require the supplier to develop a corrective plan to bring its activities into compliance with the AVR Supplier Code of Conduct. AVR will discuss this with the supplier. If the supplier is unwilling or unable to cooperate, AVR may decide to terminate the cooperation.

2. Ethical Norms

Suppliers should at all times conduct their business in a professional and independent manner and in accordance with the standards and rules set out in all applicable international and national laws and regulations. Suppliers must act with integrity, honesty and fairness in all aspects of their business activities.

AVR expects its suppliers to treat their employees, and all persons acting on their behalf, in accordance with the highest ethical standards. Suppliers must comply with applicable laws, regulations and other applicable rules, codes and regulations and avoid all forms of corruption and bribery. In particular, AVR's suppliers are required to adopt anti-corruption policies and programmes, and to monitor compliance with these policies and programmes. It also encourages its suppliers to adopt their own policies and ensure the promotion and dissemination of their own codes of conduct within their own organisations.

3. Protection of employees' rights

To protect the rights of employees, AVR expects its suppliers to comply with the standards and conditions described below:

Ensure a working environment for employees that is free from any form of harassment or discrimination based on, but not limited to, age, racial or ethnic origin, disability, gender, nationality, marital status, sexual orientation, political affiliation or union membership.

Ensure a working environment that pays attention to safety and minimises health risks or harm to employees.

Legislation on minimum age must be respected. Legislation on payment of minimum wages should also be observed. In the absence of such legislation, care should be taken to ensure that wages are in line with relevant industry standards in force. Laws and regulations on maximum working hours should be respected and adhered to.

4. Conflicts of interests

Suppliers must inform AVR if an AVR employee has an interest in the supplier's business that could create a conflict of interest. Suppliers and persons acting on their behalf should avoid conflicts of interest in relation to their private activities, entities in which they, their close relatives or employees have an interest, their business activities with other parties and their share of the business relationship with AVR. Supplier shall inform AVR of existing conflicts of interest as soon as it becomes aware of such conflicts.

5. Gifts & Entertainment

Suppliers must not offer any gifts, meals or entertainment to an AVR employee or a family member of an AVR employee that could influence or give the appearance of influencing that employee's decision regarding AVR's business or potential business with the supplier. Suppliers are not permitted to give any benefit to AVR's representatives, just as AVR's representatives are not permitted to accept any benefit if it could influence or give the appearance of influencing a business decision. The term "advantage" includes - although not exhaustively - a gift, loan, commission, remuneration, office, employment, contract, service or favour.

6. Accurate accounting and tax compliance

Keeping accurate accounting records and truthfully declaring all required taxes and duties is an indispensable part of running a lawful and transparent business in a sustainable manner. AVR expects its suppliers to act with the highest degree of care in this regard.

7. Data security

Suppliers will comply with all applicable data protection laws (AVG) when collecting, processing, storing or otherwise handling personal data of individuals, including, but not limited to, their own employees and employees of their customers, suppliers and business partners according to the guidelines of the General Data Protection Regulation (autoriteitpersoonsgegevens.nl). If a contractual obligation is made with a supplier that processes personal data, a processor agreement will be drawn up separately for this purpose.

8. Respecting the environment

AVR encourages its suppliers to consider the climate change risks associated with their operations and to minimise environmental impacts as far as reasonably possible. It also encourages its business partners and suppliers to use resources efficiently and avoid waste.

AVR invites its suppliers to comply with the standards, practices and principles described below.

Comply with all relevant environmental laws and regulations.

Try to minimise the energy consumption and carbon footprint of operations by implementing environmental policies and environmental management systems.

AVR encourages the use of environmentally friendly technologies that can reduce energy consumption, minimise the need for business travel and reduce dependence on resources such as paper. In addition, AVR considers it important to expand the use of environmentally friendly, recycled and/or sustainably forested materials and products in operations as much as possible.

9. Notification obligation

Suppliers must report to AVR representatives any suspected or imminent breach of this AVR Supplier Code of Conduct.

10. Safety

AVR has eight lifesaving rules aimed at the activities that potentially involve the greatest safety risk. We want everyone to contribute daily to reducing the risks involved in these activities and thanks in part to that, to be able to go home safe and sound.

Our lifesaving rules support our safety policy and procedures. The rules are compulsory for everyone present and/or working at AVR locations.



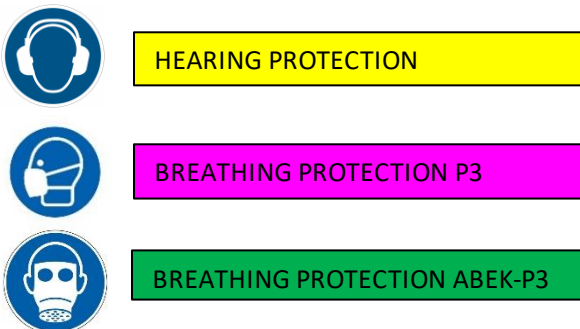
Annex 1 provides text and explanation of these symbols

Personal protective equipment (PPE)

There is a PPE free route on the AVR site, which is signposted. On the non-PPE free route, the following PPE is mandatory throughout the site.



Additional PPE is mandatory in some areas or spaces. On the premises or at the entrance to an area, it is indicated when you should wear what. Additional PPE may include:



11. Sanction policy

In case of a violation by a person not employed by AVR but by another employer, AVR will inform the formal employer of this person of the violation committed with a request to take appropriate disciplinary measures to prevent recurrence.

AVR is entitled to instruct the said external force to leave AVR's premises and not to allow him/her to continue working. In case of a violation by an external force, AVR's internal principal shall be informed as soon as possible. For escalation, the SHEQ manager or the Site Manager may be approached.

Sanction matrix

In order to provide the external force with as much clarity as possible in advance about the consequences of his/her actions and the sanctions that may apply in the event of a particular violation, AVR has prepared a sanction matrix. This sanction matrix is attached to this document as Appendix B.

The most common violations are listed in this matrix. If a violation is not listed in the matrix, AVR will consider the most appropriate sanction at that time.

The various violations are divided into four categories rising from light, medium, heavy to very heavy. For each category, the sanction with which the violation can be punished is indicated. In case of doubt about the allocation of the sanction, the Manager SHEQ decides.

This classification is a guideline. Depending on the concrete circumstances of the case, such as the seriousness of the violation, AVR may deviate from this classification. A repetition of violations and/or committing multiple violations at the same time will lead to an upscaling of the sanction. Here, one or more warnings may ultimately lead to permanent denial of access to the AVR premises.

The sanction matrix is included in appendix 2.

Appendix 1 The 8 Life Saving Rules explanation

Work with a valid licence



A work licence is required for high-risk work activities in the areas of safety, health and environment, such as maintenance and cleaning work. The licence determines the safety regulations for carrying out the work.

Why is this rule important?

Mistakes with work licences are often the cause of industrial disasters and also occur at AVR. The process of the work licence is there to protect you and your colleagues.

When does this rule apply?

For most maintenance and cleaning work, you need a work permit. This allows all hazards to be identified and proper coordination takes place between all involved.

Working at a height



Always use fall protection when working at height. Check that the fall protection is working properly and that you know how to use it.

When climbing a ladder, always maintain contact with the ladder at three points. Ensure that the danger zone below the work site cannot be entered.

Why is this rule important?

A fall from height is a major cause of fatal accidents in the industry.

When does this rule apply?

When working at height and there are no collective facilities (such as fencing), you must use personal fall protection. Above 2 metres, it is a legal requirement in the Netherlands. At any height, assess the risk and protect yourself.

LOTOTO for securing installations



- Follow applicable procedures to check that equipment is electrically and physically isolated before starting maintenance work.
- Identify potential risks associated with energy sources and what these risks are.
- Lock out all energy sources and 'lock out' and 'tag out' all means by which they are closed.
- Ensure that the owner of the facility installs a lock and that everyone involved installs their own personal lock.
- Always remain alert to the presence of hazardous substances or energy flows.
- Ensure that no one starts work before formal permission is given.

Why is this rule important?

Niet goed veiligstellen van apparatuur zorgt jaarlijks voor dodelijke ongevallen en veel ongevallen met letsel. Dit willen wij voorkomen met een werkwijze die dit voorkomt.

When does this rule apply?

All plant, machinery and equipment likely to cause injury must be made safe before any work is carried out on them.

Entering a restricted space



Before entering a confined space, check that the applicable procedures have been followed.

Why is this rule important?

Fatal accidents occur every year in confined space operations, often in rescue operations.

When does this rule apply?

Before entering a confined space, a work permit must be issued and signed by all those involved. Confined spaces are defined on site and are locations with restricted access where there is a risk of injury or health damage from hazardous substances, conditions or activities.

Switching off safety devices



- Identify the hazards against which the critical safety equipment/facility provides protection and the possible effects of removing that protection.
- Check what protective measures are needed and take them.
- Obtain permission before actually taking the equipment out of service or having it taken out of service.
- Put the override or decommissioning in writing and let all interested parties know.
- Check that the equipment has been restored to correct operation and document this.

Why is this rule important?

Faulty or disabled safety systems can cost lives.

When does this rule apply?

Safety equipment, including interlocks, guards and alarms, may only be disabled (bridged) with prior written consent.

Smoking is forbidden



AVR's facilities may contain flammable substances. A smoking ban prevents fire hazards.

Why is this rule important?

Fire can have a major impact on our operations, as well as on our employees and external forces.

When does this rule apply?

The rule applies at all times and to the entire site.

Do not work while under the influence of alcohol, medicines and/or drugs



- Make sure you are not under the influence of alcohol or drugs while working. This contributes to the safety of yourself and others.

- Drugs include stimulants, narcotics and mind-altering substances as listed in the Opium Act. Drugs may also include medicines that affect consciousness or (driving) ability.
- Intervene if you suspect or observe use of alcohol or drugs and talk to the user about it. Discuss the situation with your supervisor.

Why is this rule important?

Using alcohol or drugs can impair your ability to perform your duties. In doing so, you put yourself and others at risk. Under the influence, you are four times more likely to be injured.

When does this rule apply?

Do not consume alcohol or drugs prior to or during work. At social events (e.g. after a staff meeting or during dinner with a client), limited use of alcohol is allowed. Stay within the legally permitted blood alcohol level if you have to drive. Everyone on the premises should behave in a professional and presentable manner.

Never be under a suspended load

Avoid getting within reach of suspended loads.



Why is this rule important?

Every year, fatal accidents occur in which people are trapped or buried by falling or toppling objects.

When does this rule apply?

In lifting and hoisting operations involving the lifting of (heavy) loads.

Golden principle

Stop work when conditions or behaviour are unsafe.

When does this rule apply?

- Take a moment for safety
- Have you done everything you can to reduce risks?
- Do a Last Minute Risk Analysis (LMRA)
- Dare a colleague, supervisor, manager, contractor or anyone else to stop work when you observe unsafe behaviour
- Always stay alert while working



Category IV, very serious offences	Category IV = Permanent disqualification from entering the AVR premises
Accepting money, goods, waste from third parties for own gain.	
Providing third parties with business-sensitive information such as customer data, quotations, contracts, etc.	
Theft/disappropriation, including taking goods that have been presented for destruction.	