

Code of Conduct

Van Ameyde Group

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2. Introduction

2.1 Background

The Code of Conduct (or 'the Code') is regarding the whole Van Ameyde Group and supplies a clear image of what is expected of every Van Ameyde employee.

The Code is a guideline of the behaviour we ought to display towards each other, our clients, suppliers and stakeholders. The rules apply as minimum requirement to which we ought to adhere at all times. For more detailed information, you can find our guidelines and procedures on Van Ameyde's [Policy House](#)

In the Code of Conduct we give our viewpoints and expectations on numerous topics of importance, such as handling confidential information, conflict of interests and undesirable behaviour.

Naturally, not all circumstances are covered by a code of such. Therefore, you are expected to exercise common sense, both at work and in your personal life, because irresponsible or even unlawful behaviour outside of work could impact Van Ameyde. The current and future success of Van Ameyde therefore partly is in your hands.

2.2 Whom does the code of conduct apply to?

The Code of Conduct applies to all employees of the Van Ameyde Group. Every employee, regardless of their position or function, is expected to conform to the Code of Conduct and corresponding guidelines. 'Employees' also encompass temporary employees, on-call workers, student workers, interim employees and interns.

2.3 What is expected of me?

Complying to the Code of Conduct

We trust that every employee will comply with the Code of Conduct. Violation of the code may lead to a disciplinary measure, like an official warning or a more far-reaching measure. This will be registered in your personal file. Ultimately, violation of the code may lead to your resignation.

Managers are responsible for the compliance of the Code of Conduct. If you might discover irregularities, it is your responsibility to inform Van Ameyde on this matter.

Respect our clients

Van Ameyde carries out claims handling for various clients. Naturally, we are ought to respect the codes of conduct of our clients as well as our own.

Supervisors

Managers must put forth the Code of Conduct and the relevant Van Ameyde procedures and are responsible for the personnel to understand and comply with the principals.

Managers are expected to treat their personnel with respect and to encourage them to ask questions, make suggestions and to express their concern about possible violations of the code.

If you have question regarding the Code, please contact your manager or one of the contact points mentioned further in this document.

3. Our Core Values

3.1 Van Ameyde Values

The Van Ameyde Group is the market leader in the domain of cross-border claims handling. We are carrying this status thanks to the trust that is given to us from our clients and stakeholders. The trust is partly based on the professionalism and integrity of our employees. Our values and standards are the foundation for this.

The Van Ameyde values are a substantial part of our company and strategy. They help us to live up to our ambition: To be 'One step ahead'.

Applying the Values to our daily tasks creates professionalism and integrity and helps us to gain and keep the trust from our clients, suppliers and stakeholders.

Every employee is expected to uphold the Values in their working activities. In the next paragraphs, the Values will be explained.

Introducing the first value: Innovative

Innovation means different things for different people. The first thing that comes to mind when discussing innovation is technology. Technology changes our world and offers a host of opportunities for us and our clients. This is why we, at Van Ameyde, are eager to adopt new technologies, launch new products & services and optimize our processes.

Being innovative does not stop at technological developments. Any Van Ameyde colleague can adopt our Value 'innovative' in his or her daily work.

The importance of being human

Although technology is accelerating into our workplace, we believe ours is, first and foremost, a people business. Whether you work with private individuals suffering a loss, deal with losses and assets of commercial clients, or provide services within Van Ameyde, it is the human aspect that makes all the difference.

When working with claimants, we understand that our work often has a major impact on peoples' lives and careers. In addition, what about our own colleagues? Empathy and offering a sympathetic ear to people in need makes all the difference. Yet it is no different when dealing with commercial clients: the persons behind insurance providers, businesses, ship-owners and government authorities. What makes us stand out is not just our expertise. It is people skills and an excellent understanding of our customers' needs and concerns.

At Van Ameyde, we uphold this value by striving to be a trusted employer, offering a fulfilling environment for our people to develop and grow.

Results-driven: part of our DNA

Results-driven probably needs little explanation. It has been in our DNA forever. Our customers have high expectations. They trust us with a crucial part of their business: driving their own customer satisfaction scores. Moreover, for those of us who do not work with 'end customers', but deliver their services to customers directly, results immediately translate in customer satisfaction.

We are a trusted partner when delivering great results, on time and as promised. Our drive is to keep improving our efficiency and quality. Day in, day out. This makes us a valued business partner.

4. Dealing with each other and others

In line with our Values, we will treat everyone with respect and dignity. Respect for the individual is at the core of all communication between Van Ameyde and its stakeholders. Van Ameyde is eager to create an environment of diversity where everyone shares their own success with the success of the company and where everyone is respected for their personal qualities.

We believe that our management and our employees should be a reflection of our society. For this reason, we want our employees and selection procedure to be free of discrimination and to provide equal chances to everyone. Within Van Ameyde, we address undesirable and unwanted behaviour among each other. Supervisors ought to be role-models in this regard.

4.1 Unwanted behaviour

Bullying and discrimination are forms of unwanted behaviour. Unwanted behaviour can take many forms, such as: bullying, discrimination, sexual intimidation, aggression or violence. The characteristic of unwanted behaviour is that the victim experiences the behaviour as unwanted, degrading, intimidating and/or offensive. Van Ameyde has no tolerance for unwanted behaviour, not towards colleagues, nor towards external individuals. We place significant importance on safeguarding our employees' human labour rights, on stopping unwanted behaviour and on preventing future recurrence in accordance with our Desired Behaviour Policy.

If you are a victim of unwanted behaviour, please report this at your supervisor or at the HR department. If you want to (anonymously) share your experience, you can also contact a confidential advisor within the Van Ameyde organization. The confidential advisor guides and gives you advice to address the unwanted behaviour. If you might know a colleague in such an undesirable situation, please help this individual by pointing out the possibilities. The procedures for reporting unwanted behaviour are set out in our whistleblower policy.

For additional information, please consult the Human Labour Rights Policy and the Desired Behaviour Policy of Van Ameyde Group. You shall find both policies in the Policy House folder.

5. How we deal with company information and resources

To carry out your duties properly you are using resources provided by Van Ameyde. This includes a laptop, confidential and business sensitive information and possibly a business phone. These resources will, fundamentally, only be used for business purposes. We expect you to handle the resources accordingly.

5.1 Confidential information

We mean by confidential information all information which you encounter through the business. This includes all information regarding insurance holders of our clients and counter parties, but also business sensitive information. To protect the confidentiality of this information is an important part of our daily job. This is a shared responsibility for us all.

We expect our employees to undertake appropriate measures to prevent confidential information from leaking out, caused by imprudence, carelessness and indiscreet behaviour. Always be extra careful when working in public spaces such as in trains, airplanes and airports. Never leave your laptop, cell phone or documents unattended. This also applies to your own desk or working environment in the office or your home and car. We expect a 'Clean Desk'. This means all confidential information is stored and locked and your laptop is stored and locked when you are leaving.

5.2 Devices

We expect you to use our laptops, cell phones and other devices in a professional and discreet manner. It is allowed to use your own mobile devices (e.g. smartphone, tablet), provided that you ensure all usual processes and procedures regarding the handling of data and information are secured.

5.3 Data privacy

Next to handling confidential information, we have rules for the protection of our information and data. In these rules there is clearly described the way you ought to handle sensitive information, passwords and how to safely send information and data.

5.4 Media

Unless you are explicitly authorized to represent Van Ameyde during an interview with the media, you are not allowed to communicate to the media in the name of Van Ameyde. If you receive a media request, send this directly to our Communications Department, whereupon we or our suppliers can react timely and properly to the request.

For more information regarding how to handle sensitive information and business resources, please see the following policies:

- **Data Protection & Privacy Policy**
- **IT Fair Use Policy**
- **Password Policy**

6. How to handle conflicts of interest

If you come across other parties in your position, be aware that these parties might have other interests. It is of importance that you can independently do your job, without a doubt of a conflict of interest. To prevent a conflict of interest, rules are set for dealing with competition, receiving gifts, having side functions, handling claims submitted by our own personnel and unfair benefits towards acquaintances.

6.1 Conflict of interest

The Van Ameyde Group handles thousands of claims on yearly bases. It might occur that Van Ameyde represents both a party and its counter party. It is not permitted to represent both parties regarding the same file.

We expect you to prevent a conflict-of-interest situation at all times. Make sure you can never benefit yourself, family, friends or other relations. Never close a transaction and never provide a service when it does not come directly out of our usual business. Always be transparent and avoid every doubt of prejudice. When a file of yourself or one of your relations occurs, never handle this file yourself, but report it to your supervisor.

6.2 Side activities

Van Ameyde encourages social engagement of its employees. The social engagement of employees in forms of internal or external ancillary positions can provide an outstanding employment. To prevent contradictory interests, it is not allowed to participate in side activities unless Van Ameyde has explicitly permitted this. The condition is that your work at Van Ameyde may not suffer from the ancillary position and that there is no conflict of interest.

We mean by ancillary positions any position that is hold by a Van Ameyde employee outside of the contractual agreement with Van Ameyde. No distinction is made between paid and unpaid positions.

6.3 Gifts

It is not permitted to accept gifts from clients, suppliers, or third parties without permission of Van Ameyde. Gifts include presents, invitations for events and other possible financial benefits.

A preliminary consideration prevents the (doubt of) a conflict of interest or external influence on your independence.

Gifts related to individual claim files may never be accepted. Gifts that do not come forth out of individual claim files and are worth €50,- or more have to be reported at the Risk & Compliance Department.

6.4 Personnel claims

All employees are expected to carry out the values of Van Ameyde. This includes integrity, respect of the Code of Conduct and to cooperate with controls. Transparency and integrity are, above all, highly valued.

Personnel claims are in scope of the regular quality and compliance controls. These are subject to all policies, processes and procedures. In short: no preferential treatment is tolerated.

Do you want to know more about conflicts of interest? Read the following policies:

- **Policy Conflict of Interest**
- **Fraud Prevention Policy**

7. How to handle incidents

7.1 Aggression and threats

The safety of Van Ameyde's employees, clients, suppliers and colleagues may never be jeopardized. There is a zero-tolerance policy for aggression. By aggression, we mean any form of behaviour that brings feelings of unsafety, or a deliberate infliction of material or immaterial damage.

Security, front office personnel and other relevant risk groups have policies and instruction and are trained in dealing with forms of aggression. Nevertheless, it might be possible that you encounter aggression or threats when carrying out your job. This may happen via telephone, social media or physically. It is crucial that every form of aggression is reported.

If you are dealing with aggression (e.g. occurring out of a claim file), please report this to your manager.

7.2 Fraud

Fraud means deliberately misusing procedures, systems, belongings, products or services with the intention of unlawfully enriching yourself or others. Fraud can be committed by a Van Ameyde employee or an external party (i.e. the insured, the counter party). When you suspect fraud by a colleague, directly report this to your manager or to the Risk & Compliance Department.

When fraud is suspected in a claim file, you have to report this to your company's Fraud Coordinator and/or your manager.

More information about fraud is available in the 'Fraud Prevention Policy'

7.3 Anti-Money Laundering

Involvement in financial criminality, money laundering or terrorism-supporting activities can expose Van Ameyde and its personnel to criminal prosecution and can do a lot of damage to Van Ameyde's reputation. Therefore, we need to stay alert on a daily basis, to prevent Van Ameyde's involvement in activities of such. A measure to mitigate this risk is to check the different Sanction Lists, whereby no transaction may be done to any of the listed parties.

If you encounter a suspicious situation directly report this to the Risk & Compliance Department.

More information about Anti-Money Laundering is available in the 'Anti-Money Laundering Policy'

7.4 Violations

The reputation and integrity of Van Ameyde are of greatest importance. For that reason, it is essential to report (suspicions of) unethical behaviour by or in our company. We encourage our employees to report any violation that is contrary to this Code of Conduct.

Violations are initially reported to your manager. It may occur that you are not comfortable to report such behaviour through the hierarchical structure. For this situation, the 'Whistle Blower Policy' is set up. The Whistle Blower process Van Ameyde guarantees a way to, if desired anonymously, report a situation, apart from the normal process.

With the Whistle Blower process Van Ameyde guarantees a fair and independent process, with understanding and protection of reprisals, for employees who wish to provide information in good faith to contribute to an investigation.

8. Questions

This code is composed by the Risk & Compliance department.

Questions regarding the Code of Conduct?

Contact your manager or the following department:

Risk & Compliance via risk&compliance@vanameyde.com