



D'leteren

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# The WayWeWork

Our guide for ethical and responsible conduct | September 2024

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We all make a large number of decisions every day. Some are relatively simple while others are much more difficult.

The WayWeWork aims to help you make these difficult decisions by setting down the principles that will enable you to act with integrity toward our customers, partners and colleagues.



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# We are all D'leteren !

Our ambition is clear: become the supplier of choice in Belgium for smooth and sustainable mobility for all. This goal is based on our unwavering commitment to apply the highest ethical standards and to comply scrupulously with all applicable laws and our own internal policies and procedures.

Acting with integrity, however, is not just about protecting our reputation or avoiding legal disputes. It is also about creating a place where we support, respect and inspire each other. This way of working is built on the foundations that are our common values: [Collaboration](#) – [Responsibility](#) – [Care](#) – [Enthusiasm](#) – [Pioneer](#).

The WayWeWork is an indispensable guide for all of us during our time at D'leteren. As CEO, I am deeply committed to the quality of our working relationships and am proud to share this new release of our ethical guide with you, a release adapted to our changing organisation and environment. I invite you to take ownership of its content and put it into practice in your day-to-day activities.

Our commitment to ethics is only meaningful if we remain vigilant as to potential breaches and shortcomings, and remedy them in order to protect our business and any victims of these breaches. Do not hesitate to speak to your manager, department head or the persons indicated in this guide if you become aware of a situation that could constitute a breach of the guide's principles. You can also use our Integrity Alert system to report these situations confidentially to an external party appointed to process these reports.

It is crucial to maintain an open and transparent environment where issues can be addressed without fear of retaliation. Our values and rules of ethics are among our most valuable resources. They enable us to gain and maintain the trust of those we serve, strengthen our commitment and unity and are the foundations on which our identity and success are built.

Denis Gorteman  
CEO of D'leteren



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# What is The WayWeWork?

D'leteren has made a firm commitment to act ethically and in accordance with the law in every aspect of its business. To deliver on this commitment and protect our reputation, it is essential that all employees be aware of the standards in place and the behaviour expected of them. The WayWeWork is the reference tool to guide us in our actions every day.

The WayWeWork is a key document setting out behavioural requirements for employees and D'leteren's instructions in this area. It also contains practical examples illustrating how important ethical issues must be addressed.

The WayWeWork is not intended to provide answers to all your questions. It provides general guidance and does not rule out the need for common sense or professional judgement. It is a starting point to guide you to find the right contact if you need additional information.

The WayWeWork applies to all employees of D'leteren Automotive and its subsidiaries. We also expect third parties acting on our behalf to follow the principles set out in this guide.



## Employee responsibility

**Every employee has a duty to set an example through ethical and respectful professional behaviour.**

Therefore, each and every one of you must:

- know and understand the topics covered in The WayWeWork;
- complete training on the topics covered in this guide within the time limits set;
- seek guidance from your line manager or any other person indicated on page 7 of this guide;
- be aware of how to report a problem, in particular through the D'leteren Integrity Alert system;
- report any inappropriate behaviour immediately.

## Managerial responsibility

**All managers are responsible for establishing a strict framework for ethical and rule-abiding behaviour. We expect D'leteren managers to set an example by complying with the guide's principles both within and outside the company, by proactively identifying and mitigating risks and escalating issues when necessary.**

As a manager, you must:

- have an in-depth understanding of the topics covered in The WayWeWork;
- share your knowledge of the guide, of D'leteren's instructions and applicable laws and regulations with employees and third parties when this is necessary;
- ensure your team is trained in D'leteren's ethical principles;
- identify and address risks of non-compliance in your activities;
- ensure processes related to your functional risk areas are communicated, understood and implemented;
- promote the D'leteren Integrity Alert system within your team;
- escalate any issues that are reported to you through the appropriate channels;
- take corrective actions to resolve issues;
- comply with D'leteren's instructions and the law.

## Questions that can help you make the right decisions

- Will this decision put D'leteren in an unlawful or unethical situation?
- Could this decision damage D'leteren's reputation?
- Does the situation generate a conflict of interest?
- Would I feel comfortable if someone treated me in the same way?
- What would my colleagues, family or friends think of my decision?
- Did I get in touch with the right people for advice?

**Breaches of this guide can constitute professional misconduct and can be punished in accordance with labour regulations and legislation in force.**





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# Speak up

If you have doubts about the best way to behave in a specific situation, if you become aware of an ethical or compliance issue or if you believe in good faith that non-compliance issues exist at D'leteren, then you must contact the persons performing the functions listed below or use the Integrity Alert system.

No matter which option you choose, the most important thing is that you speak up and report any problems so they can be identified and resolved as quickly as possible.

Each situation reported will be treated in confidence and with respect. Under no circumstances will an employee who makes a report in good faith be subject to retaliation. Anyone who attempts to retaliate, regardless of his or her position in the company, will be liable to sanctions.

## The people having the following functions are at your disposal

- Your manager
- Your department management
- Your HR Business Partner
- D'leteren's Risk, Compliance and Whistleblowing Officer
- D'leteren's Head of Internal Audit
- D'leteren's Head of Legal
- D'leteren's Social Relations and Legal Manager
- The CEO of D'leteren
- D'leteren's Chief Human Resources Officer
- The CEO of D'leteren Group
- Your entity's external risk prevention service  
(find contact information at <https://www.seed-connect.be>).  
From January 2025, Attentia's risk prevention service  
([accessible on 02/738 75 31 - email: psy.prev@attentia.be](mailto:psy.prev@attentia.be)),  
that can already be contacted by staff members of D'leteren Automotive, Volkswagen D'leteren Finance, PCA, PCB and D'leteren Centers, will be extended to Wonder, Autralis and D'leteren Mobility Company.



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# D'Ieteren's Integrity Alert system

If you are not comfortable contacting any of the functions above, you can report the problem, anonymously or not, through D'Ieteren's Integrity Alert system. This system is available on dieteren.be and on the intranets and websites of each of our businesses. The system is at your disposal, and it is also at the disposal of our business partners, customers and those with whom we work.

## How to submit a report

1. Go to the digital platform that enables you to report any breach, anonymously or not, in a secure environment:

[whistleblowersoftware.com](https://whistleblowersoftware.com).

The platform is managed by the independent firm Fieldfisher.

2. Detail the issue: What, where, when, how, who?
3. Specify whether you wish to remain anonymous or not
4. Be available and cooperate during the report processing or investigation period



## How are you protected

- Absolute confidentiality (external law firm)
- Specialised support and follow-up
- Protection of whistleblowers by law and by D'Ieteren

Please refer to the Whistleblowing Policy available on the intranets for more details and to find out about the entire procedure.

### Examples of breaches include:

- conflicts of interest, corruption;
- fraud or diversion of money, dishonesty, falsification, manipulation;
- unfair competition;
- immoral, disrespectful or discriminatory behaviour;
- endangerment of physical or IT security or of human health;
- breach of privacy or personal data;
- pollution that does not comply with standards;
- breach of the company's tangible or intangible property or trade secrets;
- inappropriate or unauthorised gifts or entertainment with our partners;
- etc.





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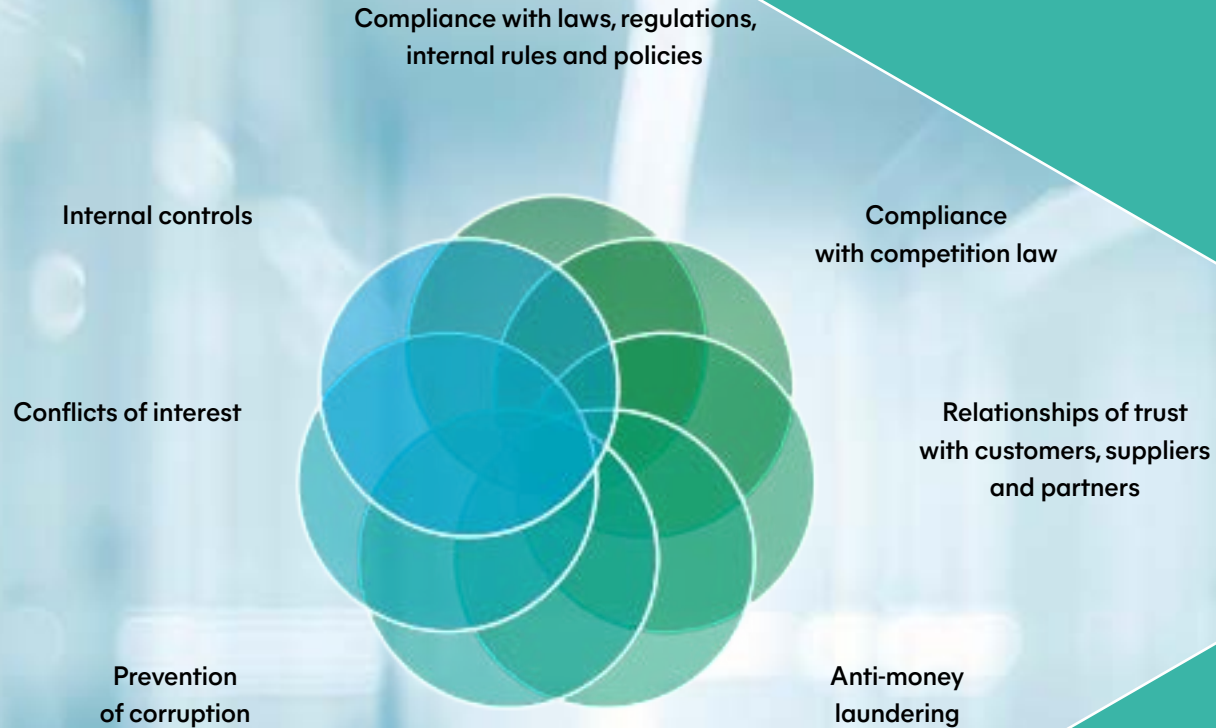
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## Compliance with laws and regulations. Compliance with internal rules and policies

D'leteren maintains its reputation by complying with the laws, regulations and other regulatory requirements in force whenever it conducts its business. Each employee is personally responsible for ensuring that he or she is aware of all laws, regulations and regulatory requirements that affect or impact his or her assignment or function. If questions arise, the Legal Department is available to answer them.

In order to achieve our ambitious ethical goals, we strive to meet a certain number of standards that are sometimes more demanding than the laws and regulations in force. In doing so, we comply with the Organisation for Economic Co-operation and Development's (OECD) guidelines, the Universal Declaration of Human Rights and the principles of the Global Compact.

In addition, D'leteren has put internal rules, directives and policies in place that govern the daily work of employees and with which they must comply.

## Compliance with competition law

We seek to distinguish ourselves from our competitors through the quality of our products and services and the ensuing loyalty we earn from our customers. We therefore operate only on the basis of fair and open competition.

As a result, D'leteren employees are prohibited from coming to any agreements with competitors that prevent or limit competition, for example agreements to fix prices, distort a tendering process, share markets or customers, or boycott a customer or supplier.

D'leteren employees must not share commercially sensitive information with competitors and must exercise caution when working on or with trade bodies. Sensitive information includes information related to prices, sales and purchase terms and conditions, profits, margins and productivity, sales or order figures, customer information, costs and investment plans.

Unfair trading practices can expose D'leteren to heavy fines and reputational damage. As the rules in this area are complex, we recommend that employees consult the Legal Department for clarification whenever necessary as well as take the training courses that this department organises on a regular basis within the company.



*Can you give a dealer details of other dealers' sales figures?*

**No,** sales figures are commercially sensitive information that cannot be shared outside one's own LMA except in some cases where they are anonymised on a country-wide level.

*Can an employee of a DMC dealership who is aware that a competitor/other LMA is giving significant discounts to its customers (to increase its market penetration) contact that competitor and agree on sales prices and a sharing of certain customers and markets?*

**No,** selling or buying price fixing and sharing customers and markets between competitors/LMAs constitute serious breaches of competition law.



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## Relationships of trust with customers, suppliers and partners

D'leteren is committed to providing our customers with high-quality products and services that meet their needs. Any person involved in negotiating contracts with customers must ensure that statements, communications and presentations made to customers are honest and accurate. All employees are required to protect sensitive and confidential customer information, and these data must only be disclosed to those who have a legitimate need to access them.

D'leteren respects its suppliers and business partners and honours its commitments.

Suppliers are selected on the basis of neutral and objective criteria such as price, quality, performance, fitness for purpose, sustainable development, etc. These relationships are managed by the Sourcing & Procurement Department, which aims to guarantee equal treatment for all suppliers and sub-contractors. All measures are taken to avoid conflicts of interest.

D'leteren now requires its suppliers and sub-contractors to sign the Supplier Code of Conduct and strictly comply with all legal requirements applicable to their operations and the business environment.

Our customers, suppliers and partners can use D'leteren's Integrity Alert system available on our website [dieteren.be](https://dieteren.be) if they feel it is necessary.

Public procurement contracts are contracts for the purchase by state-owned enterprises and public entities of goods, services and works. These contracts have very specific requirements and are subject to complex procurement rules and procedures. D'leteren complies with the laws and regulations governing public procurement contracts and prohibits unethical behaviour.



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## Anti-money laundering

Money laundering refers to the concealing of the source of funds acquired through illicit activities, such as tax evasion, corruption or financial fraud. To prevent money laundering, D'leteren does business with reputable partners and carries out its financial transactions in compliance with all anti-money laundering laws and regulations.

## The fight against corruption

Corruption includes any action where one person offers, promises, gives, solicits or accepts an undue advantage in exchange for influencing the action of another in the discharge of his or her duties. This includes bribes, unlawful commissions or any other form of remuneration, or the use of third parties (sub-contractors, advisors or agents) to carry out these actions.

D'leteren has zero tolerance of all corruption activities. We will not accept or make any payment to secure an undue advantage.



*A customer wants to pay for his or her vehicle/bicycle partly in cash. Is this allowed?*

**Yes** provided that the cash payment does not exceed €3,000.

*A supplier who submits a bid in a call for tenders issued by the Sourcing & Procurement Department and with whom I would be working if they were selected, wishes to invite me to a restaurant. Can I accept?*

**No.**

It is important to maintain a professional distance during the tendering process. Accepting an invitation to a restaurant from a supplier submitting a tender can be seen as an attempt to influence the choice of bidder. Therefore, it is best to decline this invitation.



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## Conflicts of interest

A conflict of interest arises when a personal interest conflicts with D'leteren's legitimate interests. There can be a conflict of interest if your personal, social or financial activities (or those of your family members or close friends) conflict with your professional responsibilities at D'leteren.

In order to protect D'leteren and protect yourself from a perceived conflict of interest, you are requested to inform your manager (in writing) of any relationship you may have with a customer, supplier or competitor, whether these are already in contact with D'leteren or not or are potential partners or not.

In addition, employees are not allowed to use company property, information or their position within D'leteren for their own personal enrichment or that of third parties. It is also forbidden to derive personal gain from the business or investment opportunities generated by D'leteren, apart from any long-term incentive plans put in place for management.

To avoid conflicts of interest, employees must use common sense and act appropriately in all situations where the objective nature of business decisions could be at risk.

Not putting a supplier in competition due to the "good relations" you have with them; accepting a gift from a supplier and giving them preference; influencing a colleague to obtain preferential terms for a relative for the purchase of a vehicle; negotiating a contract that will have a close friend's company listed as one of D'leteren's suppliers; calling on one of the company's suppliers for private reasons... these are all examples of conflicts of interest that can lead to a loss of objectivity, a perception of dependency or have an adverse impact on the performance of your work at D'leteren.

If you are a director and are faced with a potential conflict of interest situation, you are required to inform the Legal Department prior to taking any decision so that it can ensure compliance with the procedure provided for in the Companies and Associations Code.



*My brother has a stake in a small company that is one of D'leteren's supplier. We do not talk business and I have never been involved in any decision regarding the use of this provider. Do I have to report the existence of this relationship?*

**Yes.**

Your relationship could create the perception of a conflict of interest. You must inform your manager of the existence of this relationship. Even if there is no direct conflict, the perception of a conflict can still cause problems for you and D'leteren.



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## Gifts and invitations

Gifts and invitations to certain events that we receive from our customers, suppliers, dealers or other partners, or that we offer, must be kept within acceptable limits, both with respect to reasonable and tolerated business practices and anti-bribery legislation.

The usual end-of-year gifts or favours of little value – i.e. less than €50 incl. VAT – received as part of reasonable business practices, as well as invitations for occasional modest meals are acceptable in principle provided that they do not influence your independence or the defence of D'leteren's interests. Under no circumstances is the exchange of cash and cash equivalents (for example, securities or gift vouchers) acceptable.

If you accept a gift or favour worth more than €50 incl. VAT, you must report it to your manager and inform him or her of the value of the gift or favour. A gift must never be accepted if it influences your judgement or is in breach of the law.

*A supplier gave me an iPad as a gift and personalised it with my initials. I know I shouldn't accept it, but I wouldn't want to offend the supplier, and since the device is already engraved, can I keep it?*

**No.**

Return the item politely to the supplier and explain D'leteren's policy by referring to The WayWeWork guide.

### → Suggestion

*Pool and share all gifts received within your department. In addition to being transparent on the subject, these are pleasant moments of exchange between colleagues.*

*As part of my role, I have regular dealings with a caterer. Can I call on this caterer for my child's wedding?*

**No.**

It is likely that the supplier will want to give you special conditions because D'leteren is its customer and you will be obligated to him or her in this case. But even if you pay the market price and get no personal gain from it, the perception of your independence of this supplier would suffer. This perception is also essential.





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## *Parallel work and other activities*

In addition to their duties at D'leteren, employees are free to participate in lawful activities provided that they do not interfere with the quality of their functions within the company and do not involve the disclosure of confidential information.

Furthermore, the activity in question must not affect the quality of the employee's duties at his or her workplace, may only be carried out outside working hours and may not involve the use of equipment, supplies or information belonging to D'leteren, unless specifically agreed in writing by management.

Under no circumstances may an activity carried out by a member of staff constitute a form of unfair competition with D'leteren, including outside working hours. Any member of staff wishing to start additional paid activity must inform his or her HR Business Partner in advance in writing to ensure compliance with these rules.



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D'leteren is committed to providing truthful and accurate information for all matters related to accounting and financial reporting. Any irregularity can have serious consequences for the company as well as for the persons responsible. In addition, at all levels of D'leteren, employees make decisions on the basis of information prepared by others. It is therefore vital to have reliable information to help our business develop.

That is why we at D'leteren ensure that our accounting and reporting documents accurately reflect all of our operations and transactions. In this context, it goes without saying that we expect employees to prepare reliable, thorough, accurate and well-documented information. Just as it goes without saying that those of us who exercise a function of supervising this information follow up and control it.

Moreover, fraud prevention and detection are fundamental to D'leteren's commitment to ethical and lawful behaviour. Fraud is defined as any act intended to deceive, steal or lie to gain an unlawful advantage. Fraud includes, for example, submitting falsified expense accounts, misappropriating or misusing company assets, managing or executing unauthorised cash transactions or payments, etc. All employees must therefore ensure that the documents, reports or information they produce are accurate, honest, fair and adequate.

If you discover erroneous reports or suspicious transactions or accounting practices involving D'leteren, you must inform your manager or one of the persons occupying the functions listed in this guide as soon as possible or use the D'leteren Integrity Alert system.



*I am responsible for monitoring the budget in my department. A colleague approached me recently to inform me of a cost overrun on a project and expressed a wish to carry over some of these costs to the next fiscal year when the budget is renewed. The costs, in the end, will be accounted for correctly. So can I simply carry these costs over to the next fiscal year?*

**No.**

You must never falsify the dates at which costs are incurred. Expenses must always be accounted for in a timely, accurate manner and in the fiscal year in which they are incurred. Inaccurate or falsified accounting can have serious consequences for both the company and the employee concerned.



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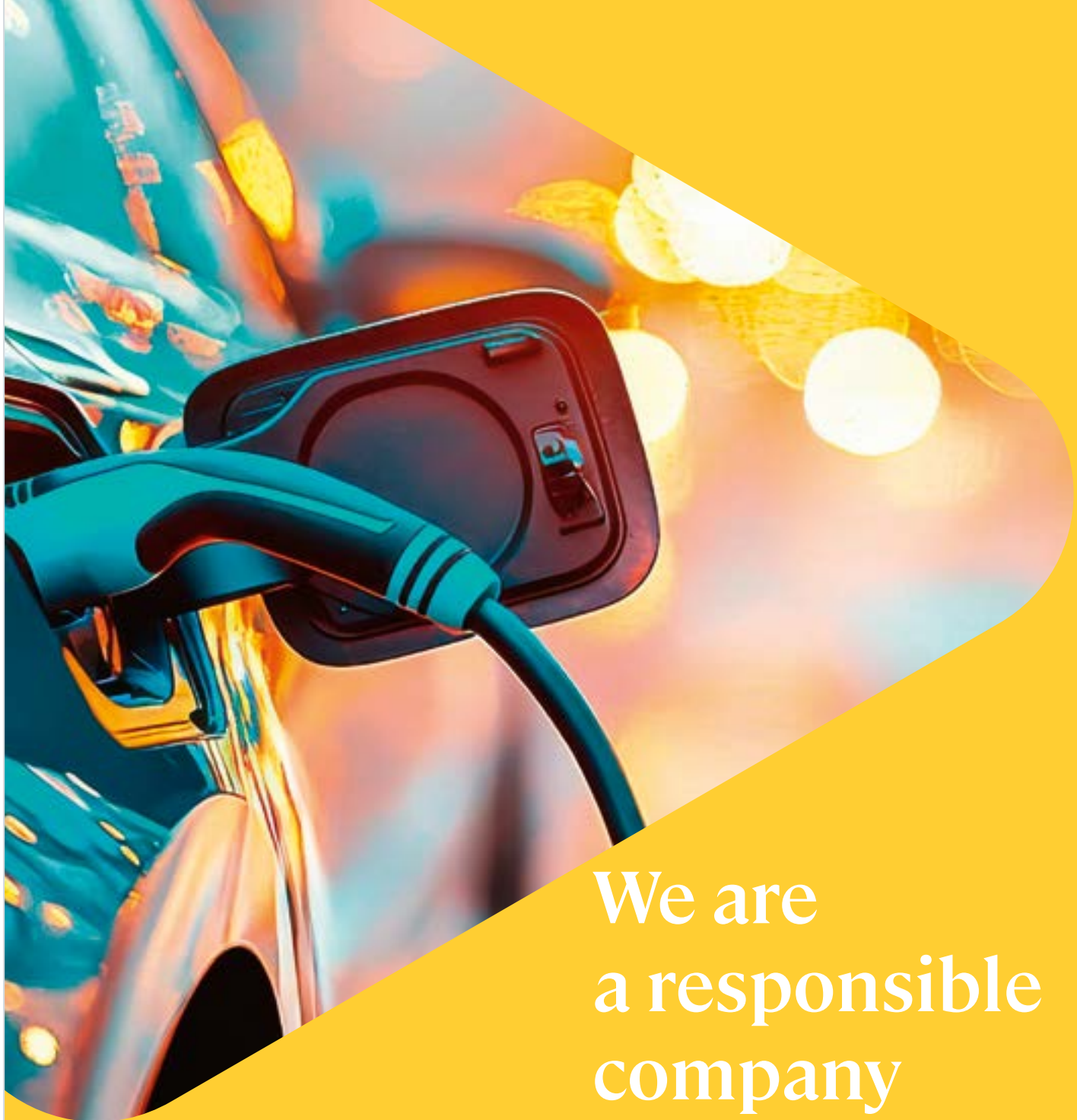
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**M**obility is the driving force behind a prosperous society, fostering social interactions and being an essential pillar of our economic growth. Mobility is our business, putting us in the privileged position of being able to place our expertise and know-how at the service of society and the environment.

Our ambition is clear: become the benchmark for sustainable mobility and a source of inspiration for the industry as a whole. We want to take decisions and actions today that will make future D'leteren generations grateful and proud of us.

**[Go to dieteren.be](https://dieteren.be) for more information on the company's ESG strategy and sustainability policy.**

## Environmental protection

D'leteren is aware of its responsibilities with respect to the environment.

Our ambition is to accelerate the decarbonisation of the mobility sector in Belgium. This means drastically reducing our dependence on fossil fuels across the entire value chain by 2030, promoting low-carbon mobility solutions, extending the life cycle of our products and thus promoting a sharing and circular economy. We will thus contribute to purifying the air, reducing traffic congestion and, above all, limiting the increase in the global temperature in line with the Paris Agreement.

**[Project Zero is D'leteren's climate plan which you can read on dieteren.be.](https://dieteren.be)**



*As a employee, can I really contribute to the impact our company has on the environment?*

**Indeed,**

each function must ensure that environmental concerns are taken into consideration when making decisions every day. In addition, basic actions such as turning off lights, printing as little as possible, recycling paper and reducing business travel can help protect the environment.



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## Build an inclusive mobility ecosystem

Mobility allows freedom of movement, connecting with others, access to employment, health care, etc. A choice of means of transport makes it easier for people to get around and has a positive impact on their quality of life. In a society where more and more people are struggling to achieve a well-balanced existence, the importance of inclusive mobility cannot be understated.

That is why we are striving to build a holistic mobility system, combining traditional mobility solutions with new means of transport, new technologies and new behaviour patterns. We want to meet the mobility needs of as many people as possible in Belgium.

## Non-funding of political activities

D'leteren keeps itself informed of political issues and developments that may impact our operations, but we do not fund any political activities.

Financing of political activities is defined as any payment made to a party, organisation or politician or to an election candidate. A payment can be anything of value, including goods, services, gifts, loans, financing a political meeting or event, an advertising campaign or anything of value provided to a politician, a political party or political organisation, such as the use of a company's offices, computer equipment or office supplies. We do not make donations to political parties, politicians or political organisations.

D'leteren respects the right of its employees to participate in the political process. However, all of these activities must be undertaken in your personal capacity, on your behalf, on your time and at your expense. It must be clear that these activities are not being carried out on behalf of D'leteren.





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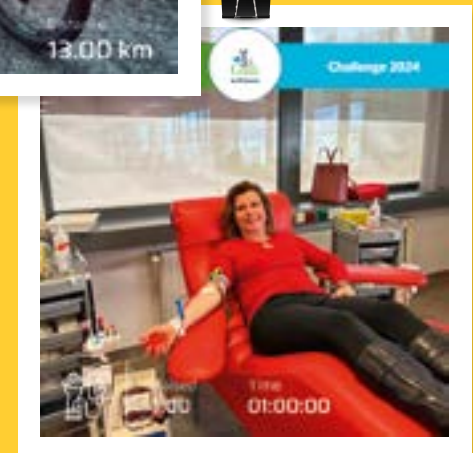
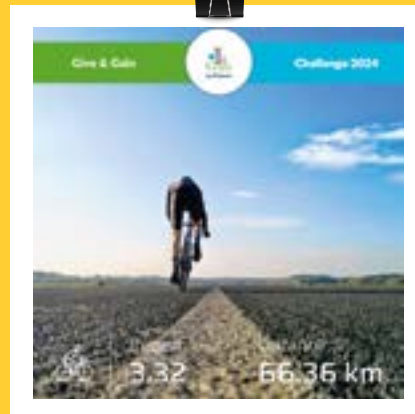
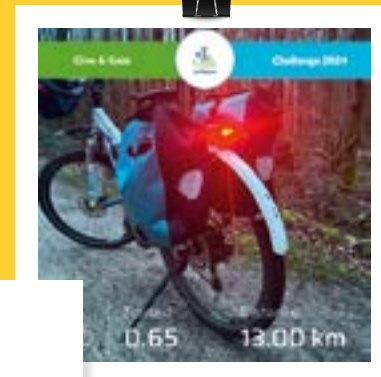
■ We respect each other

■ Protection of D'leteren's property

## Actively engage in local community initiatives to help foster an inclusive economy

D'leteren actively participates in Belgian association life through its patronage and sponsorship activities. The charitable causes supported are, for the most part, related to the company's businesses, its values and the specificities of its brands. These patronage and sponsorship initiatives must have an appropriate purpose and must not create a real or apparent conflict of interest or seek to gain an undue advantage.

With increasing demands forthcoming and in a concern for ethics and transparency, D'leteren has based its Give & Gain patronage policy on precise goals that meet exclusion, eligibility and preferential criteria. All charitable activities must be properly recorded on the donation form and forwarded to [giveandgain@dieteren.be](mailto:giveandgain@dieteren.be).



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# We respect each other



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D'leteren is a people-centric business. These people are our colleagues, the customers we serve and our business partners. At D'leteren, we are committed to providing an inclusive, safe and healthy working environment, in which everyone is respected and appreciated.

## Respect for human rights

D'leteren is committed to respecting laws governing human rights and fair labour practices.

We adhere to the UN guiding principles on Business and Human Rights.

We strictly prohibit our suppliers and sub-contractors from engaging in any form of unlawful, forced or compulsory labour.



*I recently learned that one of our suppliers had made headlines because of allegations of child labour. Does D'leteren care about the behaviour of an outside third party or can I simply ignore this information?*

D'leteren prohibits our suppliers and sub-contractors from partaking in any unlawful or forced labour practices. While this may be just an allegation, you must inform the Legal Department so that further information can be gathered about the professional practices of that particular supplier.



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## Workplace behaviour

D'leteren is committed to promoting a work environment in which its employees respect each other. Behaviour that includes any form of harassment, intimidation, oppression, exploitation, violence in the broadest sense of the term, discrimination, racism, sexism or homophobia cannot be tolerated under any circumstances. Employees must be able to work in a safe and stimulating environment.

If you witness or experience discrimination, inappropriate behaviour or harassment, report it immediately to your manager or anyone who performs any of the functions listed in this guide. Bear in mind that ignoring the problem will not make it go away. Prompt notification of inappropriate conduct enables the issue to be addressed rapidly and a favourable environment to be maintained.

As part of our commitment to maintaining a professional and respectful environment, it is essential that all employees adopt appropriate dress. The dress code at work must reflect our corporate image. Employee clothing must be neat, clean and appropriate to the work environment, while respecting safety standards where necessary. Casual clothing can be accepted in some cases, but must always be sober and appropriate.



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## Equal opportunities, inclusion and non-discrimination

D'leteren offers equal access to employment for its employees and qualified candidates so that everyone can contribute and succeed at D'leteren. The hiring, training and personal development of people from different backgrounds are major assets for the company.

All employment decisions, including hiring, performance appraisal, promotion, training, compensation and development, will be based solely on objective factors such as merit, qualifications, performance and other professional considerations. D'leteren prohibits any form of discrimination based on age, race, gender, ethnic origin, nationality, religion, health, disability, marital status, sexual preferences, political or philosophical beliefs, trade union membership, or other characteristics protected by applicable laws and regulations.

### Diversity in the workplace and religious or conscientious symbols

At D'leteren, we value and respect the cultural and religious diversity of our employees.

D'leteren is committed to maintaining an inclusive work environment where respect and acceptance of all individuals are paramount, as long as this does not hinder the company's ability to ensure a safe working environment.

The wearing of religious or conscientious symbols is allowed. However, no religious or conscientious symbol may compromise the safety of workers in the workplace, and everyone must remain identifiable. Furthermore, employees are required to adhere to any restrictions that may be imposed in the context of external collaborations.

Finally, outward signs of political affiliation are not permitted.

*If any questions arise, they can be addressed to the HR Department.*





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## Health and Safety

The implementation of stringent safety standards and ongoing improvement to those standards are an integral part of our work ethics and commitment. D'leteren offers working conditions on its sites that are intended to protect the health and safety of its employees and contractors.

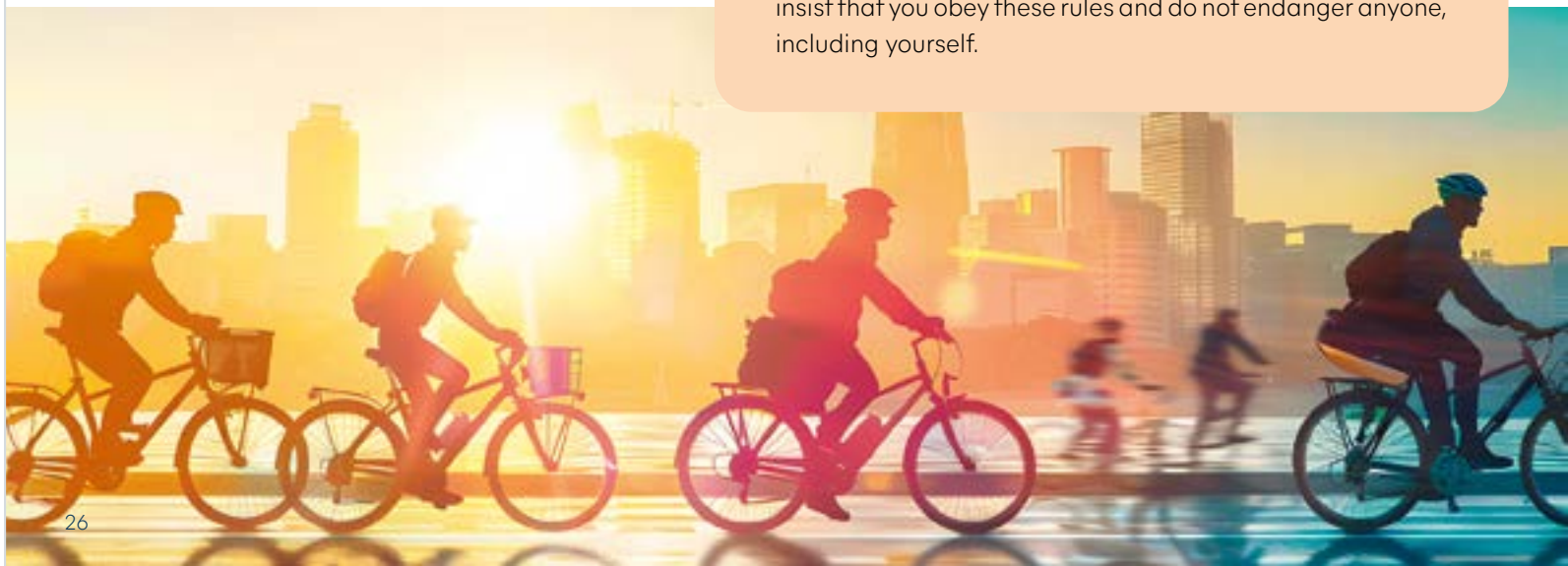
Everyone is responsible for ensuring that the activities incumbent on them are carried out in accordance with the general regulations that apply as well as the rules specific to D'leteren, and they must report any problematic situations or dangerous equipment.

In addition, D'leteren acknowledges the need for an appropriate balance between private and professional life and takes various initiatives in favour of the well-being and health of its employees.

The safety of colleagues, customers and the public can depend on our ability to think clearly and react quickly. Being under the influence of alcohol or drugs or taking medication inappropriately can impair the ability of an employee to perform work safely and this is therefore prohibited during working hours, on company premises or when using a company vehicle.

No strong alcohol will be offered at internal or external events organised by the company.

Only wines, champagnes or beers can be consumed there and then of course in moderation. Compliance with road traffic rules, during your business trips or test drives for example, is also a key part of our ethical commitment. We insist that you obey these rules and do not endanger anyone, including yourself.





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## Protection of personal data

We guarantee the confidentiality and security of the personal data of our employees, our customers and any other persons with whom we have dealings. Personal data can only be used for legitimate business purposes and in compliance with applicable legislation.

As a result, no personal data will be disclosed to third parties unless this is necessary and permitted by law. You might have access to other people's personal data in the course of performing your duties. Access to these data is restricted to those employees who have a legitimate reason to process this information on behalf of D'leteren through the nature and extent of their duties and professional responsibilities.

It is incumbent on each employee to ensure personal data are not inappropriately handled, used or disclosed.

*My sister is starting up her own business and asked me to provide her with my colleagues' contact details to add to her network of business contacts. I think they might be interested in what she is selling. Can I give her their names and email addresses?*

## No.

**You cannot provide this information. Your sister will have to find another way to build up her clientèle. The names and email addresses of employees are personal data and can only be processed by D'leteren for legitimate business purposes.**



D'leteren's Data Protection and Confidentiality Committee (DPCC) is at your disposal if you have any questions on this subject. Any suspected data breach with respect to D'leteren's data must be reported as soon as possible to [dpcc@dieteren.be](mailto:dpcc@dieteren.be).



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# Protection of D'leteren's property

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**W**e expect employees to use D'leteren's property responsibly. This property includes not only tangible items such as the premises, merchandise, supplies, vehicles, equipment, furniture, IT networks, etc., but also intangible elements such as working time, D'leteren's image and its brands, ideas, creations and concepts. Asset protection also includes lists of customers and suppliers and other market data.

All rights to the goods and information generated or acquired in the course of the employee's work for D'leteren remain the exclusive property of D'leteren, unless provided otherwise by law.

## Use of the company's IT resources

D'leteren places communication tools such as computers, printers, email addresses and telephones at the disposal of employees and these tools are mainly to be used for work purposes.

Professional data on personal devices connected to D'leteren's network belongs to D'leteren and will be deleted when the employee leaves the company.

The use of means of communication is based on the recognition that private and professional lives are closely linked and that a fair balance between the two of them benefits both D'leteren and its employees. Therefore, personal use is permitted to the extent that it is reasonable and necessary in the circumstances, and must not interfere with your professional obligations.



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## Non-disclosure of confidential information

Protecting confidential information about employees, customers, business partners and suppliers is a key commitment. We want to protect this confidential information from unauthorised disclosure or access.

In addition, protecting information about pricing, supplier contracts, business and marketing strategies, intellectual property, litigation and risks allows us to protect our competitive position and is a critical factor in our success.

All our employees are obliged to preserve and protect the confidentiality of information relating to D'leteren even after termination of their employment contracts.

We all have access to confidential information in the course of performing our duties. These can relate to a business strategy, economic data or the personal situation of our employees, customers, shareholders or dealers. Such a situation requires that we take all steps necessary to prevent access to such information, by securing our PC or smartphone by means of strong passwords for example or by not holding professional conversations in public places (over the phone or otherwise).

You might receive requests for confidential information in the course of your duties. Be careful and ask your manager for advice if you are in doubt as to whether you can disclose this information or not.

## Insider trading

Employees may sometimes access information in the course of their professional duties that is not known to the public and which, if made public, would influence the stock price of D'leteren Group's shares. The mere disclosure of such information, internally or externally, is punishable by law. It follows that the acquisition or sale of the company's shares or other securities (directly or through an intermediary) is prohibited for those who hold such information and this for as long as the information is not in the public domain. Only information that is already in the public domain (available on [www.dieteren.com](http://www.dieteren.com)) can be forwarded to others or commented on. No other commercial or financial information can be disclosed without prior authorisation. The disclosure of such information is furthermore subject to stringent rules and is restricted to a small number of formally authorised persons.

Rules on inside information also apply to information you might acquire about other publicly traded companies, including customers, suppliers and business partners.

## Good to know

It is prohibited to disclose or use any commercial or confidential secrets for personal purposes, whether during the employee's employment or after his or her employment contract with D'leteren has been terminated. This ban also applies with respect to internal mobility within the group. Confidential information obtained in one entity of D'leteren may not be used in another. Any breach of this non-disclosure obligation is a legal and contractual offence, as a result of which the employee and D'leteren can be liable to sanctions, in particular by the Belgian Competition Authority.



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## Use of artificial intelligence

Artificial intelligence (AI) tools are a great opportunity for D'leteren to achieve greater efficiency and innovate in our services. However, it is essential that we use these technologies ethically and responsibly.

AI must always be used in compliance with the most stringent data privacy and security standards. In addition, the results produced by AI must be systematically challenged and verified to ensure they are accurate and complete. Together we must ensure that AI is beneficial to everyone.

ChatGPT is a language model developed by OpenAI that can generate text in a conversational way. It can be used for a variety of applications, including education, customer service and entertainment. However, be vigilant, as ChatGPT operates outside D'leteren's protected environment.

### Good practices when using ChatGPT

Always check the privacy and data management policies of the platform you use to access ChatGPT.

Avoid sensitive Information: avoid sharing personal or sensitive information unless you are sure that privacy measures are adequate.

Use of secure services: for specific needs, opt for secure versions or specific services that guarantee better data protection.





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## Communication

D'leteren, through its brands and developments, actively communicates with customers, journalists, opinion leaders, investors and the general public. It is an essential element in preserving the company's image and reputation.

For these reasons, communication with the media is the sole responsibility of the Public Relations Department and General Management. If you receive a request for an interview or information from a journalist, we ask you to notify the Public Relations Department (at [public.relations@dieteren.be](mailto:public.relations@dieteren.be)) and coordinate with this department. If the request comes from a financial analyst or investor, please forward it to D'leteren Group's Financial Communication Department.

For the sake of consistency and information validity, documents intended for wide publication, within and outside D'leteren, must be approved by the appropriate communication department or be prepared in collaboration with it. In the event of a crisis, relay the relevant information in your possession directly to General Management and strictly apply the communication guidelines that will be given to you.

## Use of social media

Social media are an important marketing tool for us. D'leteren employees must exercise caution when disseminating company information on internal or external social networks.

If you represent D'leteren's products and services on social media, say that you work for D'leteren. Limit yourself to your areas of expertise. All your statements must be accurate and not misleading. If you leave D'leteren, remember to update your professional information.

Do not reveal confidential information under any conditions. If you post a description of your responsibilities on LinkedIn, be careful not to reveal information about products that are still secret. Prohibited topics include litigation and financial and product information that has not yet been published. Also, be sure to comply with trademark, copyright and image rights laws.

If you make a mistake, admit it. Be frank and correct your mistake quickly. However, immediately notify the public relations department if you notice that information that should be confidential is circulating on social networks.



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# Moving people ► forward

## D'leteren

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