

Our Code of Conduct

# Do **The Right** Thing



The **Code of Conduct** sets the standard for how we work **together** to develop and deliver products, how we protect the **value** of our group, and how we work with our colleagues, customers, suppliers and others.

The Code of Conduct shows what **Maxeda DIY Group** stands for.

All of us, throughout the entire organisation, will work according to our cultural values:



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# 1.

## The scope of the Code of Conduct

### To whom does the Code of Conduct apply?

This Code of Conduct first and foremost applies to all employees within the holding and business units (Brico, BricoPlanit and Praxis) of Maxeda DIY Group. Our employees, most of whom have intensive contacts with our customers and suppliers, play an important role in setting the public image of the various formats and are therefore crucial for the image and reputation of our group as a whole.

Keeping that reputation intact is essential. It is important that all our employees understand the policy principles, put those principles into action and actively propagate them. As one team we should practice what we preach: we should walk the talk. The Executive Leadership Team (ELT) within Maxeda DIY Group has an important role to play in this matter. They have to set the example and ensure employees have a sound knowledge and adequate means to be able to comply with the Code of Conduct. Human Resources is the first point of contact if the employees have any questions about the compliance with this Code of Conduct and integrity.

Finally, the Code of Conduct in some respects also applies to our suppliers, agents and other third parties with whom we do business. In some cases this has been explicitly mentioned in this document. But also if the Code of Conduct does not explicitly refer to our business partners, we expect them to respect the fundamental values laid down in the Code of Conduct.

### Scope of the Code of Conduct

In this Code of Conduct we indicate our primary objectives. These apply to the holding and all business units of the Maxeda DIY Group. However, the business units may complement the Code of Conduct with further guidelines or rules on the manner in which the employees, suppliers and other stakeholders should behave if they work for or do business with the business unit in question. These further guidelines or rules cannot be contradictory to this Code of Conduct. Where in this Code of Conduct the term Maxeda DIY Group is used this refers to the Group as a whole including all our business units, unless the opposite is clear from the text. The Code of Conducts set the integrity standards for our business and its employees. It protects the reputation of Maxeda DIY Group.



## Developments

Our company has a long history. Both the separate formats and the Group as a whole have gone through many changes in the course of time. We will continue to develop in the future. Given that we work and live in a dynamic environment, we want to regularly review the Code of Conduct and adjust it if necessary. This Code of Conduct is, at all times, a reflection on the social developments and our own opinions on the role and position of our company within society.



# 2.

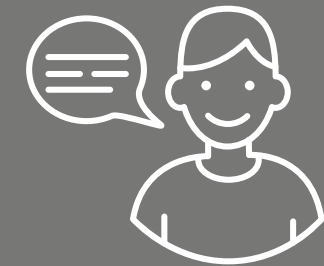
## Integrity

### Starting point

We wish our company to be dependable. Our integrity should be beyond all doubt. In view of the important social role of Maxeda DIY Group, it is imperative that all our employees comply with the legislation and regulations of the countries in which we are active and also comply with the values and standards that apply within Maxeda DIY Group and which have been laid down in this Code of Conduct.

We expect our employees to show integrity and honesty in their mutual relationships and in relationships with third parties. We also expect integrity and reliability from our business partners, such as suppliers and agents.

'Our **integrity** should be beyond all doubt.'



### Privacy

We respect the privacy of our customers and employees and protect their personal data. At our operations we can gather information on customers, suppliers, competitors and other parties. We deal with those data in a confidential manner and will only use them for acceptable commercial purposes of Maxeda DIY Group, whereby the applicable regulations, including but not limited to the General Data Protection Regulation (GDPR), will be respected.

## Gifts & Invitations

The general principle is that employees of Maxeda DIY Group are not allowed to give or accept gifts. By gifts we do not only mean products, but for example also services, entertainment, tickets for sports events or the like. In short, anything that is given voluntarily and has a certain value for the receiver.

There are some cases where refusal of a gift could cause embarrassment or hurt to the person offering it. For example when visiting another country and the gift is something from that country offered as part of a public occasion. In these cases, the gift can be accepted on behalf of the company and this must be reported to the manager and handed over to the Compliance Officers of the company and be registered in a log. This also applies to gifts that are sent by mail.

The business units and head offices will regularly put up all received gifts for raffle amongst their employees. Dinners must be paid for by the relevant employee unless the manager or management team has approved that the company or the other party pays for it. Invitations for trips or events can only be accepted with approval of the manager or management team.

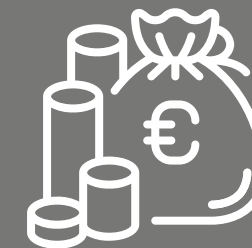
We expect our suppliers and other business partners to refrain from offering gifts to our employees or to third parties with the aim of influencing them. Should we find that this was not complied with, we may end the commercial relationship. Offering, promising or giving bribes as well as re-questing, accepting and receiving bribes is strictly forbidden in any event and may result in criminal charges towards the employee(s) and Maxeda DIY Group as a company.

## Theft & Fraud

It is the policy of Maxeda DIY Group to immediately investigate, report, and, should the occasion arise, prosecute any cases of internal or external theft related to Maxeda DIY Group. This policy consists of guidelines on how to act in the event of theft, fraud and other types of crime. To report this, read chapter 8.

## Administration

The management must make sure that all relevant transactions and other actions are recorded in the administration in a correct, precise and truthful manner.



## Conflicts of interest

We depend on the trust of our customers, suppliers and other third parties. Conflicts of interest or the appearance of conflicts of interest undermine Maxeda DIY Group's good reputation. A conflict of interests arises in a situation in which the position of an employee within the company is used to serve personal, commercial or financial interests, be it to the detriment of the company or not.

Any situation in which a conflict (or the appearance of a conflict) could arise between personal interests and the interests of Maxeda DIY Group, should be avoided. In particular, any transaction of a business unit where an employee has a personal interest must be approved upfront by the manager of the person to whom that employee is directly reporting.

This includes transactions with that employee himself or herself, but also transactions with businesses in which the employee has an interest or is in any other way involved (for example as advisor or supervisory director).

# 3.

## Doing business

### Customers

Our customers are decisive to our success. Therefore, we do our utmost to meet or exceed our customers' needs. We provide our customers with good service and are open to complaints, comments and recommendations.

### Competition

We do business on the basis of honest and ethical management, good faith and integrity. We expect the same from everyone with whom we do business. Legislation on competition aims at promoting free and fair competition. The business units of Maxeda DIY Group comply with this legislation. Maxeda DIY Group is supportive of constructive legislation prohibiting trade restrictions, sharp practices and abuse of economic power. Employees of Maxeda DIY Group are not allowed to exchange information on profits, prices, market shares and any other confidential information if it leads to a violation of competition legislation. Also our suppliers and partners who have access to this information are contractually bound to the confidentiality clause.

### Comply with the law

Maxeda DIY Group follows the Letter and Spirit of the Law. As a global company Maxeda DIY Group must comply with the laws of the many countries in which it does business. We are each responsible for following applicable laws or regulations. We also must act in a manner that upholds the spirit and the intent of the law. Where the Code or company guidelines differ from local laws or regulations, we must always follow the higher standard. Violations of laws and regulations have serious consequences, both for the company and for the individuals involved. Therefore, when any questions arise on these or other legal matters, you should always seek guidance from our Legal Department of Maxeda DIY Group.



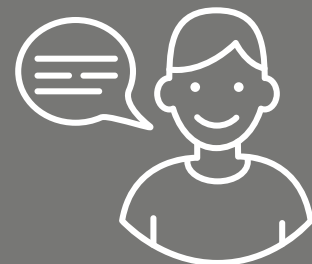
## Public Communications

As an unlisted company, Maxeda DIY Group needs to comply with a variety of regulations that govern public communications to investors and the public and promote transparency in financial markets. In addition, general news disclosures, external presentations and public communications of all types should be coordinated in advance with the Group's Corporate Communications, being responsible for disclosing information publicly about Maxeda DIY Group and its business units. Only authorized employees may make any public statements on behalf of Maxeda DIY Group or their business units, whether to the media, investors, or in other external forums including the Internet. This includes disclosing new or confidential information regarding our total business through social & online media, news groups and websites.

## Social Media Code of Conduct

Social media is changing the way we work, offering a new model to engage with customers, colleagues, and the world at large. We believe this kind of interaction can help you to build stronger, more successful business relationships. And it's a way for you to take part in global conversations related to the work we are doing at Maxeda DIY Group and the things we care about. Here are some guidelines for using social media.

**'Play nice and fair.  
Online you're always  
on the record.'**



Make sure all that transparency doesn't violate the confidentiality or legal guidelines of our business and your own privacy. Remember, if you're online, you're on the record: everything on the Internet is public, searchable and it could stay there a long time. And what you write is ultimately your responsibility.

## Make sure we can be proud of you:

People quickly believe what they read on social media and the lines between public and private, personal and professional are blurred. Just by identifying yourself as an employee, you are creating perceptions about your expertise and about our organisation. Do us all proud.

### Add value:

There is already a lot of information online. So make sure your post has added value. An online post is a conversation (people can react), so keep it real. You can also improve online information by citing others who are writing about the same topic.

### Keep it cool:

There can be a fine line between healthy debate and incendiary reaction. Be careful and considerate.

### Play nice and fair:

Anything you publish must be true and not misleading. For example, don't slam the competition.

**'Make sure we can be  
proud of you.'**

### Oops?

If you make a mistake, admit it. Be upfront and be quick with your correction.

### Don't over share:

Be careful out there. Once you hit "share", you usually can't get it back.

### Don't tell secrets:

Never reveal classified or confidential information. If you're unsure, check with the Groups Corporate Communications department. Off-limit topics include also: litigation, non-published financials, and unreleased product info. Also, please respect brand, trademark, copyright, fair use, and trade secrets. If it gives you pause...pause rather than publish.

# 4.

## Capital assets & information

### The group's financial means

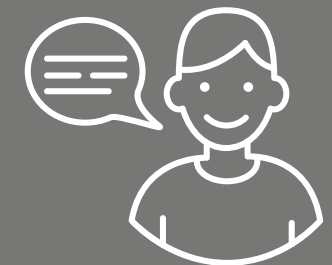
Employees are responsible for the adequate use, protection and maintenance of the group's financial means. These means consist of, among other matters, cash, credit cards, invoices and receipts. It is paramount to protect these against abuse, loss or theft. All claims, receipts, invoices and bills must be correct and complete.

### Use of the computer, Internet & e-mail

Information technology and infrastructure that function adequately are crucial to our commercial success. Each employee using the computer and the network, therefore, must do this in a responsible and appropriate manner. Personal (non-business) use must remain within reason and must be kept to a minimum.

Maxeda DIY Group has an internal policy 'Internet and mail policy', that can be consulted via MijnHR or Brico Intranet.

'Employees handling  
**confidential information**  
have a duty of  
confidentiality.'



### Confidentiality

Every employee must treat confidential data with care. Employees handling confidential information have a duty of confidentiality. Unwarranted disclosure of this kind of information can harm Maxeda DIY Group.

# 5.

## Working conditions & working

### Starting point

Our management style aims at creating conditions in which our employees are engaged to their work and feel responsible for their task. Maxeda DIY Group puts high priority on good, safe and healthy working conditions.

### Health & safety of our customers and personnel

We aim that all our business units have an approved and tested recall procedure. We aim that all our business units have a safety and security manual. Our activities are labour-intensive and mostly take place in areas that should be easily accessible to large flows of consumers. In places where many people gather, safety aspects should be a major concern. This is why we are continually devoted to creating safe working and shopping conditions for both employees and customers.

### Diversity and inclusion

We want to be an inclusive organization in which everyone, regardless of religion, sexual orientation, gender, age, race, nationality, marital status, disability or chronic illness, belief, political opinion, working hours (full-time or part-time) or type of contract (permanent or permanent) ), feel at home. No form of discrimination based on these characteristics will be tolerated.

We make optimal use of the diversity of talents and capabilities on the labour market and make sure that everyone is enabled to contribute to the operating result according to their ability. All employees are given the opportunity to develop and grow with us.

We have a company culture where everyone feels safe, respected and heard and has equal opportunities. We offer a safe working environment in which all employees feel welcome, can be themselves and have a say. Differences are valued and even sought to use for work. We don't exclude anyone, but rather look for cooperation.

### **Intimidation, harassment and aggression**

Sexual harassment, other kinds of intimidation, harassment and aggression are inadmissible. Executives should be attentive to possible cases of intimidation, harassment or aggression and immediately report such a situation to the Compliance Officer, or the person or authority appointed in accordance with local law or regulations, and end this situation as soon as possible. Complaints can be submitted to the executive, the Compliance Officer, the Human Resources Department or to senior management.

### **Use of drugs & alcohol**

We expect our employees to behave in an appropriate manner at all times. This means, amongst other matters, that the consumption of alcohol or drugs at work and during working hours is strictly forbidden. During business lunches, dinners, business receptions or celebrations moderate consumption of alcohol is allowed.

### **The right of association**

Employees have a right of association and are entitled to bargain collectively. They are also entitled to become a member of a trade union or works council. Maxeda DIY Group values engagement with employee representative bodies and will foster open communication with these groups.

### **Extra activities**

We welcome the fact that our employees have extra activities, as long as these do not go against Maxeda DIY Group's interests. If these activities have to be combined with the daily working activities, this happens after upfront approval with management.



# 6.

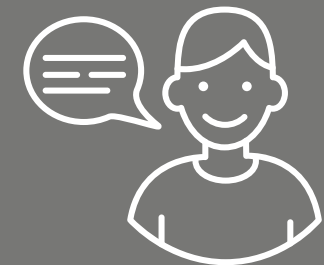
## Working conditions of suppliers

### Basic conditions

Our business units and business relations purchase products from a large number of countries across a wide spectrum of cultural backgrounds and social conditions. Therefore, we have set a number of basic conditions concerning working methods and conditions that we expect our suppliers and manufacturers to meet. It covers all the products and services we buy, from single products to professional services, in every market where we operate across the world. We expect all our suppliers to commit to meeting these requirements.

In our Vendor Manual we incorporate fully detailed responsible Sourcing Principles. Find below a summary of the main topics of the social standards. In accordance with the ILO (International Labour Organisation) conventions, the Universal Declaration of Human Rights, the Convention of Children's Rights, and the Convention on the Elimination of all Types of Discrimination against Women we aspire to reaching compliance of the following social standards:

'We expect all our suppliers to **commit** to meeting these requirements.'



### Legal Compliance

Compliance with all applicable national laws and regulations, industry minimum standards, ILO and UN Conventions, and any other relevant statutory requirements, whichever requirements are more stringent.

### **Freedom of Association & the Right to Collective Bargaining**

In situations or countries in which the rights regarding freedom of association and collective bargaining are restricted by law, parallel means of independent and free organisation and bargaining shall be facilitated. In accordance with ILO conventions 87, 98 and 135.

**'No one has to face verbal or physical abuse at work.'**

### **Prohibition of Discrimination**

No discrimination shall be tolerated on the basis of gender, age, religion, race, caste, social background, disability, ethnic and national origin, nationality, membership in workers' organisations including unions, political affiliation, sexual orientation, or any other personal characteristics. In accordance with ILO conventions 100 and 111.

### **Eradicate Harassment & Violence**

This means making sure no one has to face verbal or physical abuse at work, or any kind of behaviour that creates a hostile or intimidating atmosphere. Sexual harassment is part of this. We expect all our suppliers to have policies in place to deal with this, and appropriate training for managers.

### **Compensation**

Wages paid for regular working hours, overtime hours and overtime differentials shall meet or exceed legal minimums and/or industry standards in the relevant country. Illegal or unauthorised deductions from wages shall not be made. In situations in which the legal minimum wage does not cover living expenses and provide some additional disposable income, companies shall strive to provide employees with adequate compensation to meet these needs. In accordance with ILO conventions 26 and 131.

### **Working Hours**

Overtime hours are to be worked solely on a voluntary basis. The maximum allowable working hours in a week are 48 and the maximum allowable overtime hours in a week are 12. An employee is entitled to at least one free day following six consecutive days worked. In accordance with ILO conventions 1 and 14.

### **Health & Safety**

This is the number one priority for Maxeda DIY Group. Our target is a zero accident rate, both for our own employees and our vendors. We expect a Maxeda DIY Group supplier to be working towards the same goal. We'll also expect our suppliers to have their own Health & Safety policy and management system, ideally one that conforms to the international Health and Safety Standard ISO 45001:2018 (the international standard for occupational health and safety).

A clear set of regulations and procedures must be established and followed regarding occupational health and safety. Workplace practice and conditions which violate basic human rights are forbidden. In accordance with ILO convention 155 and ILO recommendation 164.

## Prohibition of Child Labour

Child labour is forbidden as defined by ILO and United Nations conventions and/or by national law. Of these various standards, the one that is the most stringent shall be followed. Any forms of exploitation of children are forbidden. Working conditions resembling slavery or harmful to children's health are forbidden. The rights of young workers must be protected. In accordance with ILO conventions 79, 138, 142 and 182.

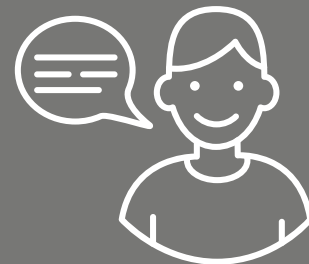
Using guidelines from the International Labour Organisation a child labourer is a child under 14 years of age involved in regular work, or under 15 in western countries. Child labour is often defined as work that deprives children of their childhood, their potential, their schooling and their dignity, and that is harmful to their physical and mental development (like heavy, nightly or dangerous work). We expect our suppliers to ensure that they only employ people above the set age, and to take care that children under 18 years of age are never employed for hazardous work.

## Prohibition of Forced or Compulsory Labour

All forms of forced labour are forbidden, as is prisoner labour that violates basic human rights. In accordance with ILO Conventions 29 and 105. This means ensuring that no one is forced to work under any kind of threat.

In practice this covers issues like allowing people to end their employment voluntarily and without any kind of penalty, and giving everyone clear contracts of employment that cover rights, obligations, notice periods and grievance procedures. Likewise any loans to employees shouldn't be part of their contract, and should be covered by a legal agreement.

'No one is **forced** to work under any kind of treat.'



## Respect indigenous peoples' rights and avoid involuntary resettlements

Indigenous peoples are distinct communities whose unique identity and culture is inextricably linked to the land on which they live, and the natural resources on which they depend. The most obvious way in which we respect the rights of these peoples is by avoiding moving them from established settlements to make way for business operations. We expect our suppliers to do the same. Where this is genuinely unavoidable, the process must be handled with the utmost sensitivity, and according to local government guidelines, and international best practice in human rights.

## Environment & Safety Issues

Procedures and standards for waste management, handling and disposal of chemicals and other dangerous materials, emissions and effluent treatment must meet or exceed minimum legal requirements. Maxeda DIY Group and its business units expect their suppliers and manufacturers to check the working conditions in their production sites against the aforementioned criteria. For this purpose, Maxeda DIY Group will establish the assessment procedures and organisations it deems acceptable.

## Helping, monitoring & auditing suppliers by BSCI

We'll work with suppliers to help them to do this, whether by offering help in specific areas, or by connecting them to amfori-BSCI and/or amfori-BEPI (Business Social Compliance Initiative). Amfori-BSCI is an organization following the social development of their organization, by yearly self assessments and audits. Amfori-BEPI is an organisation that monitors environmental aspects of a production by, for example, conducting annual audits and self-assessments. Maxeda DIY Group is participant of the BSCI Network.

# 7.

## Society & environment

### Our corporate responsibility

As largest do-it-yourself retailer in the Benelux, Maxeda DIY Group takes her responsibility in in pursuing an Environmental, Social & Governance (ESG) focused business. For us, corporate responsibility means achieving business success in ways that demonstrate respect for people and the planet and uphold the values and high standards of ethics expressed in this Code.

### 'Being a Responsible Citizen.'

We demonstrate respect for people and the planet and ask all our employees and suppliers to consider the short and long-term impacts to the environment and the community when they make business decisions. Through various sustainability initiatives, Maxeda has been committed to make a positive contribution to the environment, society and our organization for many years. In all our activities, we need to uphold Maxeda DIY Group's reputation as a role model for socially responsible behaviour.

### Environmental stewardship

We expect our suppliers to do the same, and to encourage similar improvements further down the supply chain. We expect our suppliers to assess the social aspects of their supply chain and amfori-BSCI, as part of their verification program, can also play a role in this. We expect our suppliers to have their own Environmental Management System or EMS, preferably certified to ISO14001 or another internationally recognized standard. We expect our suppliers to be compliant with the Maxeda DIY Group Code of Conduct.



# Our sustainability strategy focuses on three focus areas:



Connecting with Our people



Reducing the carbon footprint of Our stores/head offices



Make it sustainable with Our products.

## 1.

### Connecting with: Our people

#### Involve employees in improving environmental performance

This is partly about empowering employees and contractors to make suggestions about improvements and partly about ensuring that they have the skills and training they need to implement the environmental policy effectively.

#### Communicate openly

A wide range of stakeholders can be affected by a supplier's environmental performance. We will look for evidence of open communication, genuine dialogue, and active reporting. We expect our suppliers to work continuously to reduce the environmental impact of their production and logistics processes and to be compliant with the Maxedá DIY Group Code of Conduct.

## 2.

### Reducing the carbon footprint of: Our stores/head offices

#### Saving of energy

Maxedá DIY Group works to reduce the carbon footprint of our buildings and vehicles. We achieve this, among other things, by electrifying the leased vehicle fleet and a continuous analysis of the energy consumption and savings potential of our buildings and by involving property owners to encourage them to make their (retail) properties more sustainable.

## 3.

### Make it sustainable with: Our products

#### Increase and make the range of sustainable products more visible

To the extent possible we aspire to using sustainable raw materials. This is specifically true for timber, for which we strive to come from forests managed in a demonstrably sustainable manner. Whenever possible, in co-operation with the manufacturers and suppliers, ecologically sound alternatives are sought besides the existing product range, taking also into account the pressure materials put on the environment. This sustainable choice will also be clearly explained to the consumer so that they can make a conscious choice.

Advancing insight in the area of potential harmfulness of materials can signify that a substance that is considered safe today, becomes suspect tomorrow. We do our utmost to only use raw materials that are safe for human beings and the environment. If there is cause to doubt the safety of certain substances at any point in time, we will look for a safer alternative, in collaboration with our manufacturers and suppliers.

## Development of more environmentally friendly products

This relates to the entire life cycle, from production to disposal after use and recovery, with the circularity aspect of the product and/or raw materials being central.

## Waste management

It is our aim to decrease the pressure on the environment in a structural manner, in the production stage, the use stage and the waste stage. As retail is an important link between manufacturers and suppliers on one hand and consumers on the other, it is possible to contribute substantially to reducing the amount of consumer packaging waste, to separating and recycling industrial waste, to reducing energy use and to limiting the pressure on the environment as a consequence of transport. This can initially be done by minimizing packaging for our own-brand products.

## Comply with all relevant environmental laws and regulations

We make ongoing improvements in environmental performance.

## Make more efficient use of natural resources, energy and land

Our suppliers will need to demonstrate that they are making efficient use of resources like water and energy, and minimizing how much waste they produce. We consider opportunities for an active re-use and recycling program.





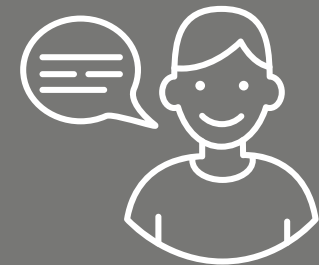
# 8.

## Compliance

### Employees

Working in retail means working with people. In this labour-intensive business, staff quality and commitment and attention for the customer are key to successful operations. Therefore, it is of vital importance that the employees act sincerely and are treated with sincerity as well. This means that they must be aware of this Code of Conduct and comply with it in good faith. If they fail to properly comply with these standards, they do not only harm themselves but also their colleagues, their business unit and Maxeda DIY Group as a whole. Breach of this Code of Conduct can lead to disciplinary measures, including the termination of the employment. Disciplinary measures will be dealt with in the framework of the local legislation.

'Therefore, it is of **vital importance** that the employees act sincerely and are treated with sincerity as well.'



### Suppliers & other stakeholders

As explained in chapter 1, we also expect our suppliers and other business partners to stick to the principles of this Code of Conduct. If we establish that their behaviour is contrary to this Code of Conduct, we reserve the right to end the business relationship, possibly with immediate effect.

## Asking questions & reporting concerns

It is the duty of all employees to respect and implement the stick to the principles of the Code of Conduct. Because the Code cannot address every situation, we expect employees to seek guidance whenever they are unsure of the correct course of action. We ask them to address the issue with their manager or with any other person in the management chain. Employees can address ethics and legal questions and concerns with the internal groups who specialize in handling such issues at Maxeda DIY Group, including our specialists at Risk & Security, Legal, Corporate Communications and Human Resources. Maxeda DIY Group will investigate all issues that are reported.

Because we aspire a culture based on integrity, trust and individual responsibility, Maxeda DIY Group offers its employees a safe and honest way to report behavior that violates the Code of Conduct, the labor regulations and, national or international law. Our whistleblowing policy for both countries follows European guidelines in this area and falls under the responsibility of the Maxeda DIY Group Compliance Officers.

Employees, consultants, as well as suppliers or employees of suppliers can report violations. Reports can be made both internally and externally in order to safeguard our integrity as much as possible. Preferably, the report is first made internally to the manager or other contact persons such as a Human Resources employee, an employee of the special service for safety and security or a confidential adviser.

In this way, feedback can be given to the reporter about the results of any investigation. If desired, a report can also be made anonymously via an external party. The relevant external reporting channels of this whistleblowing policy are country specific. All employees are proactively informed about these helplines that are easily accessible to employees, with Maxeda DIY Group paying the utmost attention to properly protecting the reporters. All reports, the evaluation of a report and the possible investigation, are treated in strict confidence in order to protect both the reporter and other parties involved from the risk of prejudice.



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