

CODE of CONDUCT 2024

Introduction

At DASA, we believe that it's not just about the contact adhesive qualities we produce and sell. Our behaviour, both as individuals and as a company, is a key part of a partnership with DASA.

It is important to realize that, as a manufacturer of contact adhesives across Europe, selling many products and having many business partners, DASA also plays an important role in society. Therefore, we must always aspire to do the right thing and act as a respectable company.

Within DASA we have defined the following values that guide us in how we work and conduct our business each and every day:

- **Focus on partnerships** Everything we do is designed to increase the value our partners find at DASA.
- **Cost consciousness** We work hard every day to produce our products with the highest efficiency possible, so that we can deliver with the best possible prices.
- **Teamwork** Maximum efficiency only works when executed by people who know how to work together with the same efficiency, as a team.
- **Discipline** It takes discipline to stay focused on what we're good at and what matters to the customer each and every day.
- **Simplicity** We find that the simple way is usually the best.
- **Respect** We are polite, honest and trustworthy with customers and colleagues alike. In a complex business environment, it is not always obvious what the right thing to do is. Our Code has been designed to provide all individuals working for DASA with further guidance in making our day-to-day business decisions. The success of the Code relies on management to lead by example but also on the commitment of all employees to familiarize themselves with the content of the Code, to be open and honest, to discuss possible dilemmas with colleagues and managers and to speak up in case you notice any violation of our Code.

Our Code is based on the following four elements:

- How we do business
- How we communicate
- How we comply with Laws and Regulations
- How we speak up As both DASA and the environment we operate in are constantly in motion, our Code will not be a static document, but will be subject to future changes. This is why it is important for you to check on a regular basis whether there are any updates available of our Code and underlying policies. In case of any discrepancies between the (local) law and our Code and/or the underlying policies, the (local) law prevails at all times.

1 How we do business

1.1 Partnerships with our customers

1.1.1 Our customers are key and the main goal of DASA is creating lasting partnerships. Pricing is of course a very important part of the partnership, but also working together to create the best product for the customer and inform them completely with the knowledge about chemical substances and understanding the contact adhesive product they buy.

1.1.2 But customers expect more than that. They expect our products to be safe and of good quality too. It is therefore of utmost importance that we live up to product safety and quality control standards and that we inform our customers about our products in a transparent and truthful way.

1.1.3 It is our ambition to always do what's right. As human beings, we may however also make mistakes. When this happens and a customer complains or otherwise provides feedback, we always take this seriously and respond quickly and appropriately.

1.2 Relationships with our colleagues

1.2.1 Our DASA team consists of many people with different backgrounds, different talents and different responsibilities, who all have the same goal: growing the success of DASA. To get the best out of our people we need to respect human and labour rights. In order to accomplish that, DASA is committed to and expects you to:

contribute to the strict observance of applicable labour laws, regulations and DASA policies; strictly observe health and safety laws, regulations and DASA policies. If you feel that your work environment is unsafe in any way, please report this to your Manager immediately; use objective, non-discriminatory criteria when decision making involves the recruitment, hiring, promotion or dismissal of employees; treat colleagues with fairness and respect and make sure that no one feels intimidated, harassed, (verbally) abused, insulted, humiliated, isolated or discriminated. Misbehavior of this kind will not be tolerated by DASA;

cooperate with colleagues, support and motivate colleagues and offer help to them without being asked to do so;

proactively share information and knowledge with colleagues, and encourage open communication;

never work while being impaired by alcohol, illegal drugs or any other substance which may have a negative effect on the due performance of your professional obligations.

1.3 Relationships with our suppliers

1.3.1 We expect you to maintain a lawful, ethical and respectful relationship with DASA suppliers at all times.

1.3.2 DASA is committed to ensure good ethical practice throughout our supply chain and has set out minimum requirements in the DASA Ethical Sourcing policy that all our suppliers have to comply with when doing business with DASA.

1.3.3 You will need to follow the DASA procurement policies in the selection of and the negotiation with suppliers and business partners.

1.4 Avoid conflict of interests

1.4.1 As a general principle DASA discourages employees from offering or accepting gifts or any forms of hospitality from suppliers and business partners. In any case such gifts or any form of hospitality may only be offered or accepted by you if this is in line with our DASA gifts and hospitality policy and even then, you should at all times avoid the appearance of bias in your business decisions.

1.4.2 Our work decisions must always be based on what is best for DASA, and not on what is best for us personally or for any of our friends or relatives. Any conflicts of interest between your private activities and your business activities for DASA should be avoided and you must notify our Compliance manager of a (potential) conflict at all times.

1.4.3 Your employment with DASA is regarded as a full-time occupation during your working hours. Outside these working hours, you may engage in other (employment) activities, provided that this does not conflict with the interests of DASA. This in any case means that you may not be employed by, or serve on any Board of Directors/Supervisory Board of a competitor or business partner.

1.5 Protect company property

1.5.1 In the performance of your job you will make use of DASA physical assets, such as equipment, tools, technology, documents, funds, accounts. DASA expects that you use these assets with respect and for the purpose intended. This also means that you need to protect the property against waste, lost, theft, misuse and damage.

1.5.2 We must all use DASA computers, data and telecommunications in a way that is ethical, legal and secure according to DASA policies.

1.5.3 Personal use of computers, phones and other equipment in line with the applicable DASA policies is allowed as long as this does not infringe on your tasks and responsibilities and does not endanger the security of DASA information.

1.5.4 We further need to protect the intellectual property rights that result from our work, ideas, improvements and developments, as this would otherwise reduce our competitive advantage and devalue our creative work. This means that DASA shall take any necessary steps to obtain, maintain and protect the intellectual property rights of DASA. Intellectual property rights, include copyrights, patents, trademarks, design rights, logos and brands.

1.5.5 As a rapidly expanding manufacturer of adhesives DASA effects the environment in many ways. DASA is fully aware of that and works hard to prevent pollution, minimise waste, and reduce the use of natural resources in order to minimize its long-term effect on the environment. DASA expects you to do the same.

2. How we communicate

2.1 Confidentiality of information

2.1.1 Confidential information related to our business that may come to your knowledge may not be shared externally. Also, be careful in discussing such information with colleagues who do not have a clear purpose to know. Confidential information includes all information that is not publicly known and that may be of use to our competitors or could otherwise be harmful to DASA if disclosed.

2.1.2 Also, confidential information about suppliers or other parties DASA does business with should never be shared outside DASA without their permission, as this information has been provided to you under the assumption that the information is safe with you.

2.1.3 Information relating to the DASA business, its business partners and the workforce needs to be documented, protected, stored and destroyed in line with local laws and regulations.

2.2 Accuracy of information

2.2.1 To protect the reputation of DASA, we always strive to provide true and accurate information to third parties (such as media, financial analyst, creditors, sellers) on the DASA business. Information must only be provided to third parties by people who are explicitly authorized to represent DASA.

2.2.2 Accurate financial statements in books and records of DASA provide stakeholders the information they need to make good investment decisions. Therefore, such statements must be timely, accurate and fair and they must comply with local laws and regulations, applicable accounting principles and internal controls.

2.3 Communication with third parties

2.3.1 DASA embraces the various opportunities social media provides. You should never forget however that electronic messages can have a negative impact on the reputation of DASA, even if this was unintended. Do not give the impression on social media that you speak on behalf of DASA and always adhere to communication policies.

3 How we comply with laws and regulations

3.1 Laws and regulations

3.1.1 Regulatory compliance is a pre-requisite of our Code. At all times we have to comply with the rules set out in applicable laws and regulations in each and every country where DASA operates.

3.2 Competition and anti-trust

3.2.1 DASA does not allow any misleading, dishonest or malicious conduct whatsoever and expects that, in your interactions with competitors, you will always act in compliance with local laws and regulations, including competition and anti-trust laws. This means that you must:

be cautious not to discuss confidential information, such as DASA's commercial position, suppliers, tenders, costs, sale conditions, pricing, promotions, strategy, product portfolio, market share, lease terms and / or any other strategic or commercial terms in violation of applicable laws with competitors; not enter into agreements, express or implied, about any of these items above or any other agreement in violation of applicable laws with competitors. For the avoidance of doubt, this covers both oral and written agreements as well as "gentlemen's agreements" and even informal conversations.

3.3 Privacy

3.3.1 We all have the right to privacy. Therefore, we have the responsibility to respect the personal data of our colleagues, customers and suppliers. DASA processes personal data in conformity with applicable local data protection laws and has put in place safeguards to protect such data as much as possible.

3.3.2 DASA expects you to only access and process personal data if this is strictly necessary to fulfill your job responsibilities, and only to the extent this is in line with local privacy law, regulations and the applicable policies within DASA.

3.4 Bribery and corruption

3.4.1 We believe in doing business fairly, and free of corruption. In your daily work for DASA it is therefore not allowed to offer, pay, ask or accept bribes, kickbacks, facilitation or similar payments, neither directly nor through a third party. Anyone who does so directly damages the trust and credibility we carefully built and violates the law. If you witness this type of behaviour, we ask you to report it immediately to your Manager and try to stop it if possible.

3.5 Fraud and theft

3.5.1 It is not allowed to be involved in an offence of theft or in fraudulent matters, such as money laundering, falsification of documents, trading of illegal goods and tax evasion, as this will seriously harm the reputation of DASA.

3.6 Dealing with public bodies

3.6.1 Anyone communicating with public authorities on behalf of DASA shall have prior express authorization of DASA for such relationship. Before responding to any non-routine request for information from a government or other public authority, your line manager, Legal or Communications will need to give prior approval.

3.6.2 In dealings with governments and other public authorities, you should always make sure that you deal honestly. That means that all information you provide is true and accurate and that you refrain from making any facilitating payments or other bribes.

3.6.3 In case you suspect or become aware that DASA is the subject of an investigation or that measures will be imposed on DASA by a public body outside the normal course of business you are expected to raise the issue immediately. You are also expected to always cooperate with such investigations.

3.6.4 When you are dealing with customs, please note that you should always comply with international and/or local trade laws and constraints and requirements on import and export, custom formalities and permits.

4 How we speak up

4.1 Adherence to our Code

4.1.1 Violating our Values, our Code and / or any laws or regulations means a violation of trust we have worked hard to foster with anyone we do business with. Furthermore, any such violation may result in serious consequences in the form of company and/or personal fines and in some countries even imprisonment of the responsible individual. Therefore, a failure to comply is regarded as a serious misconduct and may lead to disciplinary sanctions by DASA, such as termination of the employment agreement.

4.1.2 If you notice a colleague about to do or doing something not in line with the principles of this Code, you should address the matter as soon as possible to the relevant Manager and try to prevent it. Avoiding irregularities and wrong doings is always better than taking care of the consequences afterwards. Seek the assistance of your manager in all cases where you are uncertain how to act.

4.2 Questions about our Code

4.2.1 After reading our Code you may have questions, or you may want to report any wrongdoing. You can raise your questions in the following ways:

Questions about the interpretation of our Code and / or advice about the application of our Code: contact your Manager. Urgent or sensitive cases that you cannot discuss with your Manager: contact the Compliance manager. The Compliance manager will treat your questions confidential.

4.3 Alert Line Policy

4.3.1 DASA stimulates openness and honesty at the work floor and believes it is essential that there is always room to discuss any concerns you may have internally. More than that, DASA wants you to speak up if you believe that our Values or our Code or any law or regulations may have been violated. Doing so helps Dear employees,

Acting with integrity and doing the right thing in all of our business practices is fundamental to DASA philosophy of winning the right way. Our unwavering commitment to maintaining the highest standards for ethics, citizenship, corporate responsibility and governance drives our success, and results in the best customers, the best suppliers and the best people wanting to work with us.

As a leading European adhesive company, we have an obligation to comply with the wide range of laws and regulations governing our business around the world. Holding ourselves to the highest standard ensures that we follow the right path in every location where we operate.

Our commitment is only as strong as the employees who uphold it. The daily actions of our employees ultimately define who we are as a company, so each of us must take responsibility for complying with our Code of Business Conduct. This Code explains our principles, summarizes our core policies and provides a framework for making ethical decisions.

I am counting on you to protect and strengthen our reputation by living our values and committing to the Code's high standards, now and in the future.

4.3.2 Our Alert Line Policy describes the channels through which you can report your concerns. This may be internally or, if you feel that you cannot express your concerns internally, externally online via info@dasa-international.com. Your concerns will be taken seriously and investigated swiftly. It is also possible to report concerns on an anonymous basis. If a violation of the relevant laws, our Values or our Code is proven, appropriate corrective or disciplinary action will be taken. You can rest assured that retaliation of any kind against anyone who in good faith made a report on suspected irregularities or wrongdoings will not be tolerated by DASA.

To Whom It May Concern:

As a socially responsible company, we at DASA applaud your efforts to ensure that your supplier business partners share your commitment to doing business with integrity.

As a European company with hundreds of customers, we receive many requests to confirm our compliance with customers varying codes of conduct. Although committing to comply with the nuances of each customer code in addition to our own is logistically impossible, we acknowledge receipt of your business code of conduct, supplier responsibility, and/or ethics inquiry and can confirm the strength of DASA's own ethical commitments.

DASA is respected for its long-standing culture of ethical business practices. Our commitments are reflected in our strong business relationships and high-quality products. We take great pride in DASA's Code of Business Conduct. Employees are also required to participate in our ethics learning program, and training on key ethics and compliance topics throughout the year. Finally, DASA actively encourages reporting of violations and concerns through multiple channels, including our telephone and website.

Our Board of Directors manage the Company's Ethics and Compliance programs. Therefore, we can assure you that our programs meet or exceed the high standards for compliance and effectiveness that are required and expected of a European adhesive manufacturer company such as DASA.

I hope this information is helpful. If you have any questions or require additional information, please feel free to contact us at info@dasa-international.com.

Yours Sincerely,



A. Waalewijn

General Manager
DASA International BV