

## Code of Conduct Governing Koninklijke Wegener NV and its Subsidiaries

### FOREWORD

*The Code of Conduct presented in this brochure describes as clearly as possible how we, as employees of Koninklijke Wegener, wish to deal with our customers, readers, advertisers, shareholders and other business relations.*

*Koninklijke Wegener's Code of Conduct complies with the statutory rules and regulations that have evolved over time, particularly with regard to listed companies.*

*The code is based on the company's mission statement, which states that Koninklijke Wegener provides valuable information to consumers and makes market information and target groups available for marketing purposes. These activities are performed in a socially responsible and honest fashion.*

*Our role in society comes paired with important responsibilities, of which we should all be aware in our day-to-day activities. Managers and staff frequently take decisions that have a direct impact on Koninklijke Wegener's reputation.*

*This brochure presents the most recently adopted Code of Conduct that applies to all staff of Koninklijke Wegener and its subsidiaries.*

J.C. Houwert

Chairman of the Board of Directors

Koninklijke Wegener NV

### INTRODUCTION

Drawing from its deep sense of regional involvement and understanding, Koninklijke Wegener NV, henceforth referred to as 'Wegener', provides valuable information to consumers and makes market information and target groups available for marketing purposes. Wegener performs its activities in a socially responsible and honest fashion. Its products and services contribute to Wegener's profitability. Pursuing this mission, Wegener achieves its objectives, on the one hand, through the nature and quality of its products and services and, on the other, by the professional manner in which the company operates and lends substance to good employership. Its directors as well as its employees, both in the Netherlands and abroad, henceforth referred to as 'staff', are expected to perform their duties in an honest, independent and reliable manner.

To underscore the importance of this mission and procedure, Wegener has formulated this Code of Conduct. Wegener and its staff are to comply with the following principles.

### COMPLIANCE WITH STATUTORY RULES AND REGULATIONS

Wegener requires its staff to comply with national and international laws and regulations, and will take action in response to any infringements, such as corruption or fraud, committed by its staff. Where relevant, this code refers to company guidelines and protocols.

### BUSINESS INTEGRITY

Wegener expects its staff to maintain a clear distinction between business and personal interests. Staff should always give priority to business interests in the performance of their duties. Wegener staff will act in accordance with the law with regard to price-sensitive information and – in so far as staff have received them – the 'Inside Information Regulations'. They will refrain from insider trading, be beyond suspicion of insider trading and are not permitted to have any material or other (personal) interests that may conflict with Wegener's interests. Wegener has formulated Whistleblower Regulations to give staff the opportunity to report any wrongdoing.

### OPENNESS AND RELIABLE INFORMATION PROVISION

Wegener recognises the importance of accurate and reliable internal and external communication about its business operations. Wegener provides the relevant information by such means as the financial, social and environmental annual report, its website, press reports and responses to specific requests for information. Confidential information and sensitive trade secrets are not disclosed. Wegener expects its staff to manage and report on financial and other details in a reliable, honest and careful manner.

### MEDIA INTEGRITY

Wegener recognises that given the deep commitment its newspapers in particular have to regional communities, the role of these media is essential. Accordingly, Wegener sees to it that these activities are performed in a reliable, honest and socially responsible fashion. The accountability and independence of newspaper editors are laid down in the editors code.

### CAREFUL ASSET MANAGEMENT

Staff will manage the materials, equipment and other assets entrusted to them with proper care and use them for business purposes. They will comply with the relevant protocols applicable in the company.

### RESPECTING AND SAFEGUARDING PRIVACY

Wegener ensures careful management of privacy-sensitive information, including databases and other data concerning customers (subscribers) and personnel. In this context, Wegener staff are instructed to act in accordance with applicable privacy laws. Data on personnel is only provided to officers who require this for the performance of their duties and are authorised to access such data by law. Wegener has a policy in place that is geared to inspection and compliance with the relevant laws. Wegener has an internet protocol to ensure responsible internet use.

### ETIQUETTE (INTERNAL AND EXTERNAL)

Contact with customers and among staff is based on respect for the individual. Discrimination on the grounds of race, religion, gender, sexual orientation, handicap, age, etc. is not permitted. Wegener encourages a familiar work environment without prejudice in which intimidating, aggressive or violent behaviour is not tolerated. To safeguard these interests, Wegener has Complaint Handling Regulations in place that enable staff – and other people working within the organisation – to file complaints about the work situation, which will be handled confidentially.

### CARE FOR WORKING CONDITIONS AND SAFETY

Wegener sets great store by safeguarding the health and safety of staff, other people working within the organisation, visitors, other people present and local residents. To this end, working conditions are improved wherever possible, in accordance with applicable laws, to prevent work-related disorders, accidents and disability, and to promote staff well-being.

### CARE FOR THE ENVIRONMENT

Wegener recognises its social responsibility and thus the importance to be attached to the protection of our natural habitat and the balanced use of the natural resources available to us. Wegener respects and abides by environmental laws. Wegener has signed an environmental policy declaration and keeps environmental records to limit environmental impact and risks.

### SOCIETY

Social involvement is inextricably connected to Wegener. As a publisher of regional newspapers and free local papers, Wegener operates at the heart of the regional distribution areas of these products. Social involvement is reflected in the support – in the form of joint ventures, sponsorships and suchlike – that Wegener lends to mainly regional and local initiatives and activities in the areas of culture, sport, charities, public information, education and leisure.

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 **WEGENER**

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Koninklijke Wegener NV  
Laan van Westenenk 4  
7336 AZ Apeldoorn  
P.O.Box 26  
7300 HB Apeldoorn  
T +31 55 538 88 88  
F +31 55 538 85 00  
E [info@wegener.nl](mailto:info@wegener.nl)  
[www.wegener.nl](http://www.wegener.nl)