



CODE
OF
CONDUCT

A message from the Executive Committee

“Our Code of Conduct helps you to always act ethically.”

A message from the Executive Committee

KONINGS invested in creating a company that offers opportunities to our employees, clients and suppliers. This has crystallised in our CORE values where **Collaboration**, **Ownership**, **Reliability** and **Entrepreneurship** are guiding us to the realisation of our strategy and mission.

Being part of a group that has such strong values makes us proud. Values that we recognise in ourselves and demonstrate every day.

This Code of Conduct protects us and prevents us from damaging our reputation, our business and those of our partners. It provides clear guidance that helps you to act ethically in everything you do. Within this framework employees have the freedom to act and operate in their daily work and, by doing so, contribute to the KONINGS success story.

Our commitment to do the right thing and comply with both the spirit and the letter of the laws that govern our industry, gives us a competitive advantage.

This Code of Conduct and the KONINGS values reflect the basic standards we believe in and the way we expect employees to run our business. They provide the foundation to build the trust that is crucial to ensure our ongoing success.

The Executive Committee,

Alex Vuylsteke, Chief Executive Officer
Geert Minnart, Chief Commercial Officer
Wim Van de Wiele, Chief Financial Officer
Bert Goyvaerts, Chief Human Resources Officer
Peter Heerwegh, Chief Operational Officer

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How do you use our Code of Conduct?

"Your Line Manager can help you with a question."

1 How do you use our Code of Conduct?

KONINGS wants to be an ethical employer and business partner, so everybody in the group needs to keep our Code of Conduct in mind. Our Code of Conduct applies to all employees, suppliers, consultants and other third party intermediaries wherever located.

We will investigate every possible violation. Not complying might result in disciplinary actions. In case of violation of the law, civil and/or criminal penalties may be imposed by a governmental agency or a court.

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We care for people

"Keep the CORE values in mind with everything you do within KONINGS."



2 We care for people

2.1 Our CORE values

Our DNA is crystallised in four CORE values: **Collaboration**, **Ownership**, **Reliability** and **Entrepreneurship**. They are our internal compass that guides us through decision-making, the way we work together and the care we have for our customers. Employees are expected to keep the CORE values in mind with everything they do within KONINGS.

2.2 Working conditions

We maintain an inclusive working environment, with working conditions that promote diversity, equal opportunities and fair employment practices for everyone. Our employees and suppliers are not to engage in any (in)direct discrimination. Employees and suppliers should not tolerate degrading treatments such as sexual or mental harassment, disrespectful language, discriminatory gestures or any form of physical violence. We do not use child labor and do not tolerate the use of child labor by our customers, suppliers and other business partners.

2.3 Health and Safety

We protect the health and safety of our employees, visitors and contractors. We promote a safe work environment and aim for zero occupational accidents and illnesses. Employees are expected to comply with the safety rules & instructions relevant to their work and to raise any concerns about potential health and safety risks.

2.4 Human Rights

We respect the human rights of our employees, the people acting on our behalf, of our customers, suppliers and other business partners. We condemn and dissociate ourselves from all forms of slavery, torture, degrading treatment or inappropriate working conditions.

Every employee will help make a workplace where human rights are respected, will build partnerships with trusted suppliers and ensure that human rights and labor standards are respected.

3

Working ethical in the Market Place

“KONINGS competes vigorously but fairly, creating sustainable and profitable growth.”

3 Working ethical in the Market Place

We always act with reliability and within the legal terms of the markets in which we operate, emphasising the quality of our products. We are a preferred company to our consumers, investors, employees, customers and other business partners. We compete vigorously but fairly, creating sustainable and profitable growth.

3.1 Quality of our Products

It is one of our priorities to bottle/manufacture products of consistently great quality and to provide excellence in services. Employees are expected to work according to policies, procedures and instructions and to report any issues and deal appropriately with the occurrence of any non-conformity.

3.2 Fair Competition

We act in line with the principle of fair competition and we comply with all antitrust and competition laws applicable to our business. We believe that fair competition is key and contributes to sustainable growth.

Competition law prohibits conduct that harms competition and consumers. It is essential that employees adhere to relevant competition laws and regulations. If they are in doubt about whether something infringes competition law, they can contact the legal counsel of Konings.

3.3 Sustainability

We strive for sustainable growth and aim to operate within the limits of our planet so that we can support the needs of the present and future generations. All employees and suppliers are expected to ask themselves if a more sustainable option is possible when making decisions and act in line with our environmental and social engagements.

4

Ethics in our Business Activities

"We act ethically in all collaborations, we avoid any conflict of interest and do not tolerate corruption."



4 Ethics in our Business Activities

We act ethically in our collaboration with our customers, suppliers and (potential) business partners. We avoid any conflict of interest and have zero tolerance of corruption in any form.

4.1 Conflicts of Interest

A conflict of interest happens whenever a personal, social, financial or political interest influences or interferes with a business decision. Employees are to act in our best interests at all times and avoid any conflict, or any appearance of a conflict, with KONINGS's interests, such as engaging in activities that directly or indirectly compete with our activities or influencing decisions as an KONINGS employee by personal or family interests or friend-ships.

4.2 Anti-Bribery and Corruption

We comply with all anti-bribery laws in place in the markets in which we operate. We will not engage in illegal or unethical practices and will not accept business if it requires giving or receiving a bribe.

All employees and suppliers are expected not to offer, promise, give, accept, agree to receive, or seek a bribe (whether for yourself or for KONINGS) of any kind in return for a favourable treatment or to gain any business advantage for yourself or for KONINGS. And employees and suppliers are expected not to make facilitation payments of any kind.

4.3 Gifts and Hospitality

Gifts are items voluntarily given without payment in return. Hospitality covers meals and events taking place with a third party. We believe that receiving or offering gifts and hospitality helps building solid and trustful business relationships.

However we must ensure that it is not an actual or perceived bribe. Accepting or offering any gift or hospitality that either makes the recipient feel obligated or could be construed as a means to make the recipient feel obligated to start or continue a business relationship, cannot be accepted.

All employees and suppliers are expected to ensure that the value of a gift or hospitality does not exceed 100€ and that it does not impact their or another person's independent judgment and objectivity in a business decision.

4.4 Community Involvement

We want to create a positive impact in society and improve people's lives whenever we connect with them, so we encourage community involvement. At the same time we need to protect ourselves from unscrupulous appeals and possible misappropriation of funds. We do not make any contributions or donations to political candidates or parties.

5

Respecting Company Information

“KONINGS protects the confidentiality of information from our company and all others.”

5 Respecting Company Information

We believe that protecting and properly using company resources, information and property contributes to our passion for integrity and creates value for our shareholders. We take measures to protect the confidentiality of our company information as well as the information we receive from our consumers, customers, suppliers and other business partners.

5.1 Social Media and Networks

Social media and networks can help generate new business opportunities, recruit new talent and promote and sell our services. To protect our image and reputation only the Executive Committee and the Human Resources team are authorised to represent and to talk on behalf of KONINGS on social media and networks.

Employees that are not part of this group can only use own social media- and network accounts to share public news relating to KONINGS and need to state that anything they post is their own opinion on their behalf.

When using social media and networks, they cannot share copyrighted publications, logos or other images that are protected by an intellectual property right and refer to KONINGS or to co-workers in an abusive or harassing manner, or violate their right to privacy

5.2 Company Assets

Company assets include physical property but also intangible assets such as company time, confidential information and intellectual property. We use company assets honestly and efficiently.

All employees are expected to use company assets only for legitimate business purposes and protect them from theft, loss, damage or misuse and not to use company assets for your personal benefit.

This applies equally to company assets belonging to our customers, suppliers and other business partners. We also treat assets belonging to other employees and people who act on our behalf the same way we treat company assets.

5.3 Personal Data and Privacy

We respect the privacy of all individuals and the confidentiality of the personal data we hold about them. We comply with all applicable laws regarding the collection, use and disclosure of personal data.

Every employee or supplier is expected to keep private and protected the personal data they have access to regarding our employees, people acting on our behalf, customers, suppliers, business partners, consumers or any other individuals.

They are to make sure they acquaint themselves with the applicable legal framework, share personal data only with authorised parties, and ensure the protection and confidentiality of those data when processing personal data.

6

Report Concerns

“You can give us the opportunity to deal with a possible issue.”



6 Report Concerns

If you are aware of a (potential) violation of our Values, our Code of Conduct, our policies or the law, we expect you to speak up and report it. By doing so, you give us the opportunity to deal with the issue. Remaining silent about possible misconduct may worsen a situation and decrease trust.

6.1 How can you raise a concern?

You can report misconduct at compliance@koningsdrinks.com.

We thank you for your attention and appreciate your commitment to ethical acting at all times.