

Code of Conduct

A message from the Executive Committee

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

KONINGS is committed to building and maintaining a company that offers meaningful opportunities to our employees, clients and suppliers. Our CORE values - **Collaboration, Ownership, Reliability** and **Entrepreneurship** are not just words; they are the driving force behind our strategy and mission guiding us to the realization of our strategy and mission.

This Code of Conduct safeguards our reputation, our business and those of our partners. It provides clear guidance that helps you to act ethically. Within this framework you are empowered to make decisions in your daily work and contribute to the ongoing success of Konings.

Our commitment to do the right thing - and comply with both the spirit and the letter of the law - together with our **relentless focus on quality**, gives us a competitive advantage.

This Code of Conduct and the KONINGS values reflect the basic standards we uphold and the expectations for how we conduct our business. They provide the foundation for building the trust that is crucial to ensure our ongoing success.

The Executive Committee

1 How do you use our Code of Conduct?

“Your Line Manager can help you with a question.”

The Konings Code of Conduct (CoC) is the foundation for all our policies* and the framework for ethical behaviour at every level of our company. It applies to all employees, suppliers, consultants, and third-party intermediaries, wherever they are located. You are expected to carefully read and fully understand the most recent version of the CoC. If anything is unclear, always ask for clarification.

When you have questions about the CoC or its application, start by discussing them with your Konings contact person, Line Manager, or HR Business Partner.

Reporting Concerns and Speak-Up Culture

If you become aware of (potential) non-compliance with the CoC, any other policy, or anything that could negatively impact quality it is your responsibility to speak up. Start by addressing the

issue directly with the person involved. If this does not resolve the matter, escalate to your Line Manager or HR Business Partner.

If you cannot report the issue through these channels, you may report it via compliance@koningsdrinks.com. Reports sent to this address will be followed-up by the HR Director and the General Counsel. You can also choose to report concerns anonymously through this link: <https://www.koningsdrinks.com/nl/gedragscode>. However, we recommend providing your identity to facilitate a thorough investigation and effective follow-up. If you do choose to report anonymously, please provide sufficient detail to allow for proper investigation and action.

Your Responsibilities

- Read and understand the CoC and apply its principles and rules in your daily work and decisions.
- If you have questions, ask for clarification—do not make assumptions.
- Remember: the CoC is the basis for all other company policies.
- Line Managers must promote ethical behaviour, ensure all employees and suppliers are familiar with the CoC, and help resolve or escalate issues as needed.
- Remember: our company produces food. Therefore, quality is of the utmost importance.
- All possible violations will be investigated. Non-compliance may result in disciplinary action, and legal violations may lead to civil or criminal penalties.

By following these steps and upholding our CORE values—Collaboration, Ownership, Reliability, and Entrepreneurship—you help protect our reputation, ensure compliance, and maintain the highest standards of quality and integrity.

Speaking up is not only allowed, it is expected.

* A policy is considered an official company policy only when:

It has been signed by the CEO, and

It has been communicated through official company channels (such as Eloomi or other internal platforms).

Always refer to the most recent version published via these channels. If you have any doubts about the validity of a policy, contact HR or Legal.

2 We care for people

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

2.1 Our CORE values

Our DNA is crystalized 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.

- **Collaboration:** Actively share information and work together to solve problems and achieve goals.
- **Ownership:** Take responsibility for your work, follow through on commitments, and address issues proactively.
- **Reliability:** Consistently follow procedures, deliver quality results, and report any deviations or concerns immediately.
- **Entrepreneurship:** Look for opportunities to improve processes, suggest innovations, and take initiative to resolve challenges.

You are expected to keep the CORE values in mind with everything you 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. This means:

- All employment decisions (eg. hiring, promotion, compensation) must be based on merit and not on gender, age, ethnicity, religion, disability, or any other protected characteristic.
- Discrimination, whether direct or indirect, is strictly prohibited.
- Any form of degrading treatment—such as sexual or mental harassment, disrespectful language, discriminatory gestures, or physical violence—will not be tolerated. If you witness or experience such behaviour, you must report it immediately.

2.3 Health and Safety

We protect the health and safety of our employees, visitors and contractors.

- You are required to follow all safety rules and instructions relevant to your work.
- If you notice any potential health or safety risk, you must report it immediately to your Line Manager or HR Business Partner.
- Our goal is zero workplace accidents and zero workplace related illnesses.

2.4 Human Rights & Ethical Labor Standards

At KONINGS, we are committed to upholding the highest standards of human rights and ethical labor practices across all our operations and business relationships. Our approach is guided by internationally recognized principles, including the ETI Base Code and the conventions of the International Labour Organization. These commitments apply to all employees, contractors, suppliers, and business partners whether employer directly, through a recruitment agency or any intermediary.

The Base Principles

- *Employment is Freely Chosen*
We prohibit all forms of forced, bonded, or involuntary labor. (Eg. Workers shall never be required to lodge deposits or surrender identity documents.)
- *Freedom of Association and Collective Bargaining*
Workers have the right to join or form trade unions and to bargain collectively. We do not tolerate discrimination against union members or representatives.
- *Safe and Hygienic Working Conditions*
We provide a safe and healthy workplace, including regular health and safety training, clean facilities, and appropriate protective equipment. Hazards are identified and mitigated promptly.
- *No Child Labor*
We do not employ anyone below the legal minimum age for employment. Young workers must not be exposed to hazardous conditions.
- *Living Wages Are Paid*
Wages meet or exceed legal and industry standards and are sufficient to meet basic needs. We do not permit deductions as a disciplinary measure.
- *Working Hours Are Not Excessive*
Working hours comply with national laws and international standards. Overtime is voluntary, fairly compensated, and does not exceed prescribed limits.
- *No Discrimination*
We ensure equal opportunities and prohibit discrimination based on race, gender, religion, age, disability, sexual orientation, or any other protected characteristic.
- *Regular Employment Is Provided*
Work is based on recognized employment relationships. We avoid exploitative practices and attempt to limit the use of temporary or agency labor.
- *No Harsh or Inhumane Treatment*
Physical abuse, threats, harassment, or intimidation are strictly forbidden.

Your Responsibilities

- Every employee is responsible for fostering a workplace where these principles are respected.
- Suppliers and partners must adhere to these standards as a condition of doing business with Konings.
- If you suspect any violation of these principles, report it immediately through the above-mentioned speak-up channels.

3 Working ethical in the marketplace

“KONINGS competes 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. You are expected to follow company policies, procedures and instructions and to report any issues. This allows us to deal appropriately with the occurrence of any non-conformity and consistently deliver products and services that meet or exceed customer expectations.

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. Examples of such unlawful conduct include price-fixing, market sharing with competitors, bid rigging, or any conduct that could harm competition or consumers.

It is essential that you adhere to relevant competition laws and regulations. If you are in doubt about whether a certain conduct infringes competition law, you should contact the General Counsel of Konings.

3.3 Sustainability

We strive for sustainable growth and aim to operate within the limits of our planet. We can support the needs of the present and future generations. Employees, suppliers and business partners 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.

We expect our employees, suppliers and business partners to demonstrate commitment, take a proactive approach and continuously improve the way of working with respect to protection of the environment. This means negative environmental and climate impacts should be prevented or minimized at the source, for example through:

- improving production or maintenance processes,
- replacing materials with more sustainable alternatives,
- reducing energy and water consumption,
- implementing recycling and reuse practices.

We prefer to work with suppliers who:

- hold independently audited sustainability certifications (e.g. ISO 14001, Ecovadis),
- actively reduce their carbon footprint,
- promote the development of products that are energy-efficient, highly recyclable, and preferably made from recycled materials.

Suppliers must always comply with the applicable statutory and international standards regarding environmental protection, minimize environmental pollution and make continuous improvements in the area of environmental protection. All resources need to be utilized appropriately and efficiently, and all waste must be disposed of in accordance with applicable laws, rules and regulations, or according to best practices if there is no law in place.

4 Ethics in our Business Activities

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

4.1 Conflicts of Interest

A conflict of interest arises when personal, social, financial, or political interests influence, or appear to influence or disrupt, business decisions.

Practical Guidelines:

- Always disclose any personal relationships or financial interests that could influence business decisions.
- Do not participate in decisions where you have a personal stake.
- Act in the best interest Konings and avoid situations that compromise objectivity or fairness.

Why It Matters: Even perceived conflicts can damage trust and expose Konings to reputational and legal risks.

4.2 Anti-Bribery and Corruption

Konings has zero tolerance for 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. You 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 favorable treatment or to gain any business advantage for yourself or for KONINGS.

Practical Guidelines:

- Gifts or hospitality must be modest, transparent, and never intended to influence decisions.
- Never make facilitation payments or use third parties to conceal improper benefits.

Examples of bribery:

- Offering gifts or excessive hospitality to a buyer at a potential customer to secure a contract for Konings.
- Granting excessive discounts or rebates to a customer in return for personal favors.
- Sponsoring a charity linked to a customer's executive to secure a long-term agreement.

Key Principle: If in doubt, consult the General Legal Counsel before giving or accepting anything of value.

4.3 Gifts and Hospitality

Gifts of low value are items voluntarily given without payment in return. Hospitality covers meals and events taking place between you and a third party.

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.

Practical guidance:

- Always assess if the gift or hospitality is reasonable, proportionate and not intended to influence a business decision.
- You are expected to ensure that the value of a gift or hospitality does not exceed 100€ .

4.4 Community Involvement

We want to create a positive impact on 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."

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 authorized to represent and to talk on behalf of KONINGS on social media and networks.

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

When using social media and networks, you cannot share copyrighted publications, logos or other images that are protected by an intellectual property right and refer to KONINGS or to your 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.

You 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 individuals and comply with all applicable laws, including the General Data Protection Regulation (GDPR), regarding the collection, use, and disclosure of personal data.

Practical Guidelines:

- Keep personal data secure and share only with authorized parties.
- Do not store, transmit, or process personal data without proper safeguards.
- Familiarize yourself with GDPR principles:
 - Lawfulness, fairness, and transparency – Always have a legal basis for processing.
 - Purpose limitation – Use data only for the specific purpose it was collected.
 - Data minimization – Collect only what is necessary.
 - Accuracy – Keep data up to date.
 - Storage limitation – Do not keep data longer than needed.
 - Integrity and confidentiality – Protect data against unauthorized access or loss.
 - Accountability – Be able to demonstrate compliance.

If in doubt:

If you process personal data and are unsure whether your actions comply with GDPR, reach out to HR, IT, or Legal immediately for guidance. They will help ensure proper handling and compliance.

6 Report Concerns

"You can give us the opportunity to deal with a possible issue"

Our responsibility to Speak Up

Integrity is not just a principle—it is the foundation. If you see or suspect any behavior that violates this Code of Conduct or any Konings policy, law or regulation, it is your duty to speak up. Silence can put our company, our colleagues, and our consumers at risk.

At Konings, we manufacture beverages that people trust and enjoy every day. Consumer safety and our reputation for quality are crucial in everything we do at Konings. Non-compliance—whether in safety, ethics, or legal obligations—can have serious consequences for our customers and for Konings.

What to Do:

- Report concerns immediately to your manager, HR, Legal, or through the designated reporting channels.
- If you are unsure whether something is compliant, ask. It is always better to clarify than to ignore.

Practical Guidance:

- First Step:
Address the issue directly with the person involved.

- If Unresolved or Impossible:
Escalate to your Line Manager or HR Business Partner.
- Formal Reporting:

Contact HR Director or General Counsel

Email: compliance@koningsdrinks.com (handled by HR Director and General Counsel).

- Anonymous reporting: <https://www.koningsdrinks.com/nl/gedragscode>.

Recommendation:

Provide your identity for effective investigation and follow-up.

If reporting anonymously, include enough detail for proper investigation.

Remember: Protecting our integrity protects our consumers, our brand, and our future.

Speaking up is not only allowed, it is expected.