

## **Code of Conduct Boelens de Gruyter - 2024**

### Introduction

Boelens de Gruyter Ontwikkeling BV (hereafter Boelens de Gruyter) employees work according to this Code of Conduct. This clarifies to Boelens de Gruyter and others what can be expected of its employees and their work.

### Status

This Code of Conduct is applicable to all employees of Boelens de Gruyter. Within the term employees we also include the board, directors, employees, flexible, temporary and hired workers and self-employed persons.

This Code of Conduct is an inseparable part of the individual employment agreement. Employees are expected to adhere to this Code of Conduct. This concerns not only the written text of this Code of Conduct but also its nature, scope and intention.

### NEPROM Code of Conduct

Boelens de Gruyter is a member of the Vereniging van Nederlandse Projectontwikkeling Maatschappijen (NEPROM) and as such has committed to the NEPROM-Code of Conduct (2024). The NEPROM- Code of Conduct is attached to this Code of Conduct and is an overarching assessment framework for the conduct of Boelens de Gruyter and its employees.

## **Principles**

### Integrity

Employees need to respect the NEPROM-Code of Conduct. This implies that they will do their work with consideration, integrity and social responsibility. These values will be discussed in more specific situations in the following standards.

## **Standards**

Employees need to follow all applicable law and legislation. Reliability and trust are the base of the agreements that employees make on behalf of Boelens de Gruyter with other parties and their compliance with these agreements.

#### Consideration

- Employees keep a complete, correct and transparent administration of their work, including transactions and invoices;
- Employees will be considerate with company property, company information and personal data;
- Employees take care in their communications and posts on social media. They will not harm company interests in these;

#### Integrity

Employees will avoid conflicts of interest and the appearance of these, therefore:

- they will report business relations with parties/persons with whom they have (in)direct personal connections;
- they will refrain from side activities and side jobs that are in conflict with legislation;
- they will report side activities and side jobs to Boelens de Gruyter to judge if these activities comply with the interests of Boelens de Gruyter;
- they will be hesitant in giving and accepting promotional gifts and services. Giving or accepting monetary gifts is not allowed;
- they will only accept invitations to trips, seminars, company visits and other meetings outside the Netherlands, after notifying Boelens de Gruyter of the intent of accepting these invitations.

#### Conduct

Employees will abstain from unwanted and inappropriate manners in the workplace and in contact with other parties. When they witness or are a victim of discrimination, sexual intimidation, aggression, harassment or other unwanted or inappropriate conduct they will report this to Boelens de Gruyter's Confidant.

#### Social responsibility

Employees are aware that Boelens de Gruyter as a member of NEPROM, together with the government, their clients, contractors, suppliers and other stakeholders, have the opportunity and possibility to develop the Netherlands in a future-proof way, so that everybody can live in a pleasant environment. This implies that the work of the employees will focus on this.

## Application, enforcement and sanctioning

### Application

Boelens de Gruyter and its employees work together in an open company culture where concerns and dilemma's about integrity can be addressed and discussed. Sincere and respectfull dialogue about these subjects are actively promoted.

### Enforcement

Violations of this Code of Conduct can be reported to Boelens de Gruyter's Confidant. This Confidant can also be approached to discuss is there is or possibly will be a violation.

For incidents or dilemma's as mentioned in the NEPROM-Code of Conduct, the commissie Gedragscode of the NEPROM can also be approached. More information on the commissie Gedragscode can be found on [de website van NEPROM](#).

### Sanctioning

If it is established that an employee has conducted, which can also include an omission of conduct, in violation of this Code of Conduct , (the board of) Boelens de Gruyter can take disciplinary and/or juridical measures against the concerned employee.

### Confidant

Confidant of Boelens de Gruyter:  
Aemilia Broekman – [aemilia@boelensdegruyter.nl](mailto:aemilia@boelensdegruyter.nl)

Appendix: NEPROM-Gedragscode (2024)