

Code of Conduct

Corporate values and rules of conduct

Code Owner	Risk Manager
Code Approver	CEO and CFO
Effective date	April 1 st 2017

Date of issue	Version	Name	Title
2017-03-27	1.0	Hugo Aupers	Risk Manager

Table of Contents

- 1. Introduction by Group Management..... 3
- 2. Dynniq DNA 4
 - 2.1. Proactive 4
 - 2.2. Reliable 4
 - 2.3. Open..... 4
- 3. Rules of Conduct 5
 - 3.1. Employee Conduct 5
 - 3.1.1. Respect and Equal Treatment..... 5
 - 3.1.2. Workplace Health & Safety 5
 - 3.1.3. Conflicts of Interest 5
 - 3.1.4. Employee Privacy 5
 - 3.1.5. Social Media and External Communications 5
 - 3.1.6. Business Assets 6
 - 3.1.7. Accurate Books 6
 - 3.1.8. Confidentiality..... 6
 - 3.2. Customers, Business Partners and Competitors..... 7
 - 3.2.1. Corporate Social Responsibility 7
 - 3.2.2. Fair dealing 7
 - 3.2.3. Anti-Corruption & Bribery 7
 - 3.2.4. Money Laundering 7
 - 3.2.5. Competition 8
 - 3.2.6. Patents and Trademarks 8
 - 3.2.7. Customer and Business Partner Privacy..... 8
 - 3.2.8. Export Controls 8
 - 3.2.9. Procurement..... 8
- 4. Your Personal Commitment 9
- 5. Our Commitment to Compliance 9

1. Introduction by Group Management

Dylnniq's reputation is one of the key assets of our company. Group Management strives to develop and promote a mix of pro-activeness and an open and reliable attitude of its employees.

The Code of Conduct (hereinafter: Code) sets out the values and rules of conduct that should follow in our everyday choices, behaviour and decisions. The main aim of this Code is to provide clear guidelines on what we mean by "Pro- active, reliable and open". A high level of awareness of Dylnniq's values, internal rules and regulations is vital for our day-to-day activities and our pursuit to create a safer, more sustainable and efficient company.

Dylnniq encourages an open and reliable culture. Valuing differences of opinion as well as cultural diversity is an important part of this. We promote a culturally diverse workforce and take all actions without regard to race, colour, national origin, age, sex, sexual orientation or disability.

Compliance with this Code, we believe, will give us an advantage in doing business and will contribute to the long-term continuity of Dylnniq. Group Management is confident that with the efforts of every employee, Dylnniq's reputation can be protected, and Dylnniq can provide trust and confidence to all our stakeholders: our shareholder, customers, suppliers, financiers, auditors and employees.

If you have any doubts about these values and rules, or how you should adhere to them in a specific situation, it is essential that you consult your line manager or the Risk Manager and ask for guidance. Only together can we guarantee the desired level of pro-activeness and an open and reliable attitude.

On behalf of Group Management

Cees de Wijs

Ron van Laar

Chief Executive Officer

Chief Financial Officer

2. Dylnniq DNA

Dylnniq is committed to sound business conduct and therefore manages its business according to the corporate values and the rules of conduct as described in this Code. Dylnniq pursues ethical behaviour for which the Code defines the principles all employees of Dylnniq live by.

Within our company the Dylnniq DNA defines our organisation; pro-activeness and an open and reliable attitude:

2.1. Proactive

Proactive means I make things happen. I don't wait, I jump in; I have the courage to step forward and I am focused on delivering the best results for my customers, for Dylnniq and for my responsibilities within our company. Simplified: I plan ahead, I prioritize, I improve, I innovate and I learn and develop myself.

2.2. Reliable

I am reliable. My yes is yes, my no is no. I am committed, consistent and I do what is true to who I am, and what is right for my customers and Dylnniq. I deliver things first time right. Simplified: I take responsibility, for safety, for our reputation, for the solutions we offer and for the future we are building.

2.3. Open

I am open. I do not hide. I do not shy away; I say what needs to be said clearly and constructively, ensuring Dylnniq is easy to deal with and able to identify challenges and opportunities in an early stage. Professional criticism. Simplified: I consistently strive to make us better; I focus on the customer, collaborate and share.

3. Rules of Conduct

This Code includes the corporate values of Dylnniq and the translation of these values into general conduct rules. The Code applies to all employees of Dylnniq.

3.1. Employee Conduct

3.1.1. Respect and Equal Treatment

Dylnniq highly values being an honest and trustworthy employer and endeavours for fair employment practices. Above all, respect enables people to do their work well with the right tools, resources and training. The efforts of all Dylnniq Employees must be aimed at encouraging high performance, appreciating and respecting each other's opinions. No harsh or inhumane treatment or harassment is tolerated, nor any form of discrimination.

3.1.2. Workplace Health & Safety

Dylnniq creates a working climate in which employees can deliver their best performance, with the right balance between work and private life. Optimal safety at work, the protection of health, and the prevention of illness and promotion of well being are the basics of Workplace Health & Safety.

3.1.3. Conflicts of Interest

Dylnniq related decisions must not be influenced by personal and private considerations. Therefore, employees must avoid any activity that could conflict with their responsibilities towards Dylnniq. These are, for example, employment or other business relationships with a competitor, customer or supplier of Dylnniq; misusing the position of the employee within Dylnniq to benefit him- or herself, family, friends or other third parties.

3.1.4. Employee Privacy

Dylnniq is committed to respect and protect employees' confidential information. This means that access to such information is limited to personnel who have appropriate authorisation and a clear business need for that information.

3.1.5. Social Media and External Communications

The use of social media can have a negative impact on the reputation of Dylnniq. Therefore, employees are expected to uphold Dylnniq's image and reputation and prevent making any statements that may be damaging to Dylnniq. External communications through social media or directly with the press must always be in close coordination with the Marketing & Communication Department.

3.1.6. Business Assets

The business assets of Dylnniq, equipment, buildings, office materials, ICT facilities, working hours and business-related know how, are only deployed for the purposes of the work at Dylnniq. Sale or theft of those assets is prohibited, and employees must use them appropriately and responsibly.

3.1.7. Accurate Financial and Business Accounting

Dylnniq believes it is vital to report accurate and non-misleading financial information about Dylnniq and its activities. This begins with precise accounting and authorisation of all business transactions in the bookkeeping process. Our records provide a complete and transparent picture; timely, reliable and relevant information is maintained. Decisions, with respect to all business transactions, should be properly documented.

3.1.8. Confidentiality

Business information is one of Dylnniq's key assets and must be treated as confidential. Our employees are prohibited from disclosing to unauthorised parties any confidential business, financial, personal or technical information, plans, or data that they have acquired.

3.2. Customers, Business Partners and Competitors

3.2.1. Corporate Social Responsibility

Dylnniq stresses the importance of Corporate Social Responsibility (CSR) and we account for our efforts to responsibly meet the world's growing economic, environmental and social needs. Within Dylnniq, socially responsible business has been translated into a number of themes. Our business operations should comply with the social demands of the environment and safety considerations. Environmentally friendly solutions are offered to clients and end users, whenever possible, with durability and degradability as important criteria. Furthermore, we strictly adhere to human rights regulations and do not tolerate child labour and/or forced, i.e., slave, labour.

3.2.2. Fair dealing

Dylnniq strives to maintain a reputation as a trustworthy and ethical business partner. We endeavour to deal fairly with all our customers, business partners and competitors. We must not take unfair advantage of anyone through any misrepresentation of material facts, manipulation, concealment and abuse of privileged information, fraud or other unfair business practice.

3.2.3. Anti-Corruption & Bribery

The giving, offering, promising, accepting, agreeing to receive or requesting gifts, invitations, bribes or other inappropriate benefits is prohibited. This applies not only to the benefits of Dylnniq's associated persons and business partners, but also those of foreign public officials. Only inexpensive promotional gifts or minor invitations for entertainment are not considered bribes. Keep in mind that even unsubstantiated claims of corruption can damage our reputation.

3.2.4. Money Laundering

Dylnniq is committed to prevent the use of Dylnniq resources for the purpose of money laundering, which is defined as an attempt by individuals or organisations to hide the proceeds of criminal activity by making those criminal proceeds legitimate. We must make or receive payments for goods and services only via approved and properly documented payment practices.

3.2.5. Competition

Dylnniq supports a free market and competes with other companies in its field in a professional, honest and ethical way. We do not tolerate violations of antitrust laws (e.g. arrangements on pricing with competitors and market divisions are forbidden).

3.2.6. Patents and Trademarks

Patents, trademarks and other intellectual property are part of the Dylnniq corporate identity and cannot be shared with any outside party. They are key strategic tools for achieving business objectives.

3.2.7. Customer and Business Partner Privacy

Dylnniq ensures the protection of privacy of customers' and business partners' personal data and communications. Dylnniq employees may not use, modify, share or distribute customer or business partner information without a proper business reason and proper authorization.

3.2.8. Export Controls

Dylnniq is dedicated to deliver a high-quality service to customers worldwide, and in order to do this, we may be required to export equipment, technology, services or software to another country, including exports by electronic transfers. In doing so we must comply with all relevant export control regulations.

3.2.9. Procurement

Dylnniq follows an active procurement policy with the goal of reaching cost reductions and addressing sustainability and innovation through cooperation with suppliers. Procurement and other Dylnniq personnel who may influence supplier selection and on-going relationships with suppliers must be particularly careful to ensure that situations which may give rise to a conflict of interest do not arise.

Further and more detailed rules and guidelines can be found in the Anti-Bribery and Corruption Policy, the Competition Compliance Policy and other policies.

4. Your Personal Commitment

Group Management makes will ensure that this Code is introduced and communicated. The Risk Manager in association with HR, Legal and Finance is responsible for revising and updating the Code when necessary. The directors and managers of business units and units are responsible for making employees aware of the rules. It is the responsibility of every employee to ensure that they apply and comply with these rules of conduct.

5. Our Commitment to Compliance

Whenever you have a question as to whether any conduct is permissible or if you would like advice on applying the corporate values or rules of conduct, you should consult with your line manager. If your concerns cannot be addressed locally, do not hesitate to contact the Risk Manager at compliance@dynniq.com.

Infringements of these rules of conduct may lead to disciplinary procedures. Our employees are required to report misconduct under the terms of the Dynniq Whistleblower Policy.

Effective Date

This Code takes effect on April 1st , 2017 and replaces all previous Code of Conduct related rules.