



Van der Valk Systemen B.V.

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1. Introduction

The Management Team has ultimate oversight of this Policy and is responsible for ensuring that the organisation fulfils its strategic, legal, and ethical obligations.

The Management Team delegates day-to-day oversight to the Sustainability & Compliance Manager, who monitors implementation, reviews performance, and recommends updates.

1.1 Governance and Responsibilities

The Managing Director is accountable for ensuring that adequate resources, systems, and organizational capabilities are in place to meet the requirements set out in this Policy.

The Management Team is responsible for embedding these requirements into business planning, operational processes, and decision-making.

The Sustainability & Compliance Manager manages the operational execution of this Policy, including coordination of data collection, reporting, internal controls, and training.

Teamleaders must ensure that activities under their control comply with this Policy and that risks, opportunities, and performance indicators are accurately identified and reported.

Employees are expected to follow internal procedures related to this Policy and to escalate issues, gaps, or breaches to their Teamleader or the relevant compliance function.

Material issues, breaches, or emerging risks identified under this Policy must be escalated to the Sustainability & Compliance Manager and, where significant, reported to the Management Team. Regular progress updates will be provided through established reporting cycles.

All objectives and targets cited in this policy will be followed up in the Sustainability KPI dashboard.

1.2 Review Mechanism

Policy reviews occur annually or as needed to align with regulatory updates, industry best practices, and stakeholder expectations. Reviews are coordinated by the Sustainability & Compliance Manager and validated by the Management Team.

1.3 Scope

This Policy applies to:

All business units of Van der Valk Systemen B.V., subsidiaries, and controlled entities, regardless of geographic location.

All employees, contractors, and temporary workers acting on behalf of the organisation.

All activities, operations, products, and services that may contribute to, or be affected by, the areas governed by this Policy (e.g., sustainability, climate risk, operational risk, compliance, etc.).



1.4 Overall Sustainability Commitments

1. We ensure compliance with applicable legislation on environmental, social & governance requirements.
2. We prevent and/or minimize the impact of our activities and infrastructure could have through implementing effective risk management.
3. We promote continuous improvement to our activities and services through the systematic assessment of our performance and by defining and achieving our ambitious objectives locally and worldwide through annual reporting on metrics and key performance indicators and through monthly management business reviews.
4. We aim to raise awareness among the majority of our employees, stressing the importance of acting in a respectful and responsible way towards the environment.
5. We aim to impose best practice, labor and environmental standards among supply chain and business associates.
6. We encourage open and regular communication with all our stakeholders about our environmental performance to respond effectively and sensitively to their worries and concerns.
7. We encourage innovation in products and services that contribute to the sustainable development of society at large and create alternative solutions that help safeguard and improve the environment and create an inclusive society.

2. Environment

2.1 Energy Consumption & Greenhouse Gas (GHG) Emissions

Qualitative Objectives:

- Monitor emissions in line with GHG protocol on annual basis.
- Integrate carbon management into daily operations and decision-making.
- Identify direct and indirect climate-relevant emissions, including production, transport, packaging, distribution, recycling, and employee-related activities.
- Embed structured carbon-footprint reduction programs approved annually by the Management Team.
- Promote employee-driven emission-reduction projects.
- Support the Paris Agreement goal of limiting global warming to 1.5 °C.

Targets:

- By 2030, Scope 1 and 2 emissions have reduced by 80% vs base year 2021.
- By 2030, Scope 3 emissions have reduced by 50% vs base year 2021.
- From 2027, CO₂-footprint due diligence is done for 80% of purchased materials and goods.

2.2 Renewable Energy

Qualitative Objectives:

- Maximize self-consumption of renewable energy generated by company owned solar panels on roofs on locations Monster and 's-Gravenzande.
- Procure renewable electricity through certified energy suppliers.
- Integrate renewable sourcing into facility and operations planning.

Targets:

- From 2026, 100% renewable-energy is used for all company processes (self-generated and purchased).
- By 2027, energy monitoring dashboard for buildings and machines has been created and is used to optimize energy usage.



2.3 Sustainable Value Chain / Sustainable Procurement

Qualitative Objectives:

- Collaborate with suppliers to reduce Scope 3 emissions and promote green energy sourcing.
- The Purchasing Department assesses the sustainability risks and carbon emissions linked to our suppliers through specialized software (Ecochain Mobius), which includes climate risk and emission Scopes 1 and 2 in the assessment.
- Set in place the mechanisms to prioritize suppliers showcasing dedication to climate action, environmental stewardship, and sustainable sourcing.
 - 100% of top 50 suppliers is based in EU.
 - Requiring all targeted suppliers to sign the Van der Valk Systemen Supplier Code of Conduct, covering environmental responsibility, labor conditions, human rights, and governance.
 - Engaging flagged suppliers (medium-high risk) through on-site visits and follow-ups.
- Prioritize suppliers demonstrating measurable climate-action commitment from 2026 onward.

Targets:

- By 2026, 100% of top 50 suppliers for VDV is based in EU.
- By 2026, 100% of top 25 suppliers for VDV have signed the Van der Valk supplier code of conduct.
- By 2027, 100% of top 25 suppliers for VDV are periodically screened on climate-risk and emissions by S&C Manager.

2.4 Waste Generation, Recycling, and Packaging

Qualitative Objectives:

- Use (raw) materials for products and packaging that can be easily separated and fully recycled.
- Identify waste materials, volumes and sorting processes in operations.
- Educate employees on waste reduction and sorting practices.
- Minimize packaging materials through smart product design.
- Maximize re-use of packaging materials (pallets, wood, cardboard boxes, etc.)
- Enhance visual management in company for waste separation by colours and labels.
- Implement reusable PPEs and improve PPE recycling, where feasible.
- Implement process for E-waste (IT department).

Targets:

- By 2025, 100% compliance with waste regulations.
- By 2030, company waste recycling rate is >75%, with rest of waste used in other useful applications.
- From 2026, 100% of employees informed on company waste policy and processes through updated Company hand book.
- By 2027, >90% of IT-waste (laptops, phones, etc.) is collected for re-use / recycling by certified company.
- From 2026, zero hazardous waste to landfill.

2.5 Product End-of-Life

Qualitative Objectives:

- Implement LCA process for decision making in new product design.
- Every line manager and subject matter expert must consistently review and endeavor to enhance processes, ensuring resource preservation and reducing the



- carbon footprint through product lifecycle improvements.
- Increase product and material circularity through business model focused on re-use and re-cycling (Circulaire Maakindustrie).
- Active contributor to re-use project for Solar mounting systems in The Netherlands (CIRCO / Solar Re-use)

Targets:

- By 2027, >90% of legacy products have a completed LCA in Ecochain Mobius.
- By 2028, all Solar mounting systems supplied by the company have instruction manuals for disassembly to enhance re-use (as part of CIRCO project).
- By 2030, >95% of all product components can be easily separated at end-of-life by users for optimal recycling of materials.

2.6 Local & Accidental Pollution

We maintain our facilities to strict regulatory standards, carefully select waste management partners, and conduct audits to monitor and reduce emissions. Our R&D, Production and Logistics departments work continuously to minimize product waste.

Qualitative Objectives:

- Prevent accidental emissions and strengthen emergency preparedness.
- Conduct audits to monitor and reduce local and accidental pollution.

Targets:

- From 2026, zero environmental incidents per year on VDV sites.
- From 2026, 100% of VDV locations have up-to-date Emergency Response Plans.
- Internal emergency trainings at VDV sites annually.

2.7 Customer Health & Safety

Qualitative Objectives:

- Ensure product safety, efficacy, and regulatory compliance.
- Continuously improve quality management systems.

Targets:

- From 2026, all products supplied by Van der Valk comply with the applicable international product safety standards and are designed and calculated in line with the applicable regulations.
- From 2026, zero product recalls due to safety non-compliance registered in ERP system (D365).

2.8 Biodiversity

Our manufacturing is confined to established industrial zones, avoiding biodiversity-sensitive areas and ensuring responsible land use. Our products and systems, specifically for the horti industry help to make the growing of crops possible in a closed environment (greenhouse). This promotes the use of biological pesticides possible, which helps to protect biodiversity.

Qualitative Objectives:

- Support ecosystem restoration near operations.
- Develop and promote systems for greenhouse applications.

Targets:

- From 2026, maintain extensive green vegetation spaces with at the company locations in Monster and 's-Gravenzande, providing a wide variety of trees, plants, and shrubs to support biodiversity.
- From 2026, grow no. of greenhouse installations through Horti Systems business unit in line with strategic sales growth plan.



2.9 Water Management

The Van der Valk Systemen sites use water only for consumption by employees and dishwashers. Our own production processes do not consume water. Still as a company we can make impact on water usage globally through our customers. Our products and systems for the horti industry help to make the growing of crops possible in a closed environment (greenhouse). Growing crops in a closed environment with climate control is less water intensive (up to factor 10!), compared to growing crops on open fields. It is a solution for regions where water is scarce.

Qualitative Objectives:

- Promote sensible water usage by employees.
- Develop and promote systems for climate control in greenhouse applications.

Targets:

- From 2026, monitor water consumption per employee on annual basis and do deep-dive analysis in case annual consumption increases by >5% vs 5-year average.
- From 2026, grow no. of greenhouse installations through Horti Systems business unit in line with strategic sales growth plan.

3. Labour

3.1 Employee Health & Safety

Qualitative Objectives:

- Foster a safety-first culture.
- Implement preventive health programs and ergonomic solutions.

Targets:

- From 2026, RI&E audit has been completed for 100% of the VDV locations (Monster and 's-Gravenzande), including an action plan, whereby $\geq 95\%$ of the identified measures will have been implemented within 12 months (end of 2026).
- From 2026, 100% of employees in production and logistics functions use safety protection gear when applicable.
- By 2026, 100% of floors in production and logistical areas on VDV sites (Monster and 's-Gravenzande) have visual markings for safe walking paths and risk zones.
- From 2026, an LTIFR ≤ 0.5 will be achieved and maintained, with zero fatal accidents per year.
- By 2026, 100% of employees in production and logistics functions will have demonstrably completed machine and safety training (VAPRO or equivalent), recorded in the HR system.
- By 2026, 100% of company employees have been invited to participate in voluntary Employee Health Checks and Quit smoking programs.

3.2 Working Conditions

Qualitative Objectives:

- Guarantee fair employment and equal treatment.
- Ensure the guidelines of the collective labor agreement are followed.

Targets:

- By 2026, 100% of employment contracts, wage components, and working time arrangements demonstrably comply with the applicable CAO Metalektro and national labor legislation, verified via an annual internal HR compliance audit.



3.3 Social Dialogue

Qualitative Objectives:

- Encourage open communication between employees, teamleaders and management.
- Promote participation through feedback and engagement mechanisms.

Targets:

- By 2026, 100% of employees has been made aware of company Code of Conduct.
- From 2026, the “Valkinside app” is available for all employees to get informed, react and interact on company related topics and events.
- From 2026, at least 4 company engagement sessions are organized (“XXL borrel” and summer + Xmas party) for all employees with at least >70% participants and recorded feedback.

3.4 Career Management and Training

Qualitative Objectives:

- Promote lifelong learning and structured career paths.
- Expand digital learning and cross-functional exchange.

Targets:

- From 2026, 100% of employees have an annual 1-on-1 performance review with their direct manager.
- By 2026, 100% of employees in need of training, have a clear training plan to be completed in 2027.

3.5 Diversity, Discrimination & Harassment

Qualitative Objectives:

- Foster inclusion and respect across the workforce.
- Prevent discrimination and harassment of any kind.

Quantitative Targets:

- From 2026, >50% of all manual labour is outsourced to sheltered workplaces in the region.
- From 2026, zero reported incidents in relation to discrimination or harassment.
- By 2026, 100% of employees are aware of company Code of Conduct.

3.6 Child Labor, Forced Labor & Human Trafficking

Qualitative Objectives:

- Enforce zero-tolerance for human rights violations.
- Embed due diligence across the value chain.

Quantitative Targets:

- By 2026, 100% of top 50 suppliers for VDV is based in EU.
- By 2026, 100% of top 25 suppliers for VDV have signed the Van der Valk supplier code of conduct.



4. Ethics & Governance

4.1 Bribery, Fraud, Corruption, Money Laundering and Business Integrity

Qualitative Objectives:

- Uphold the highest standards of integrity, transparency, and ethical conduct across all business activities.
- Prohibit all forms of bribery, fraud, corruption, and money-laundering, ensuring decisions are made fairly and without improper influence.
- Implement and maintain robust internal controls, due-diligence processes, and monitoring mechanisms to prevent, detect, and respond to unethical or illicit financial behavior.
- Ensure all employees, contractors, and business partners understand and comply with the organisation's expectations regarding ethical conduct and financial integrity.
- Promote a culture of openness and accountability, encouraging the reporting of suspected misconduct through secure, confidential, and non-retaliatory channels.
- Conduct appropriate risk assessments, including screening of third parties, customers, and transactions, to minimise exposure to unethical practices.
- Comply with all applicable laws, regulations, and international standards governing anti-bribery, anti-corruption, fraud prevention, and anti-money-laundering.
- Continuously strengthen awareness and capabilities through training, communication, and periodic review of policies, processes, and controls.

Targets:

- From 2026, 100% of employees are aware of company Code of Conduct as published in Company hand book.
- By 2026, 100% of sales team has been trained on ethics.
- By 2026, 100% of sales team has been trained on Export and Sanctions.

4.2 Information Security

Qualitative Objectives:

- Comply with European laws on protection of personal data.
- Protect sensitive company data and ensure cyber resilience at all company levels.
- Raise employee awareness on data security.

Targets:

- From 2026, 100% of in-house data servers, laptops and working stations are protected by security program (managed by VTM).
- From 2026, 100% of office employees are obliged to participate in online training program on cybersecurity through Phished training program. This includes random tests on awareness.

5. Innovation, R&D

5.1 Innovation and R&D

Qualitative Objectives:

- Integrate sustainability into R&D processes.
- Continue resource-efficient investment in short- to long-term projects.
- Perform Life Cycle Assessments (LCA) for all new product developments.

Targets:

- From 2027, 100% of new product developments undergo LCA for knowledge-based decision making during the development process.



5.2 Product Quality & Customer Health

Qualitative Objectives:

- Maintain highest product quality and regulatory compliance.
- Provide clear installation instructions and guidelines for every product and customer type.

Targets:

- From 2026, all products supplied by Van der Valk comply with the applicable international product safety standards and are designed and calculated in line with the applicable regulations.
- From 2026, zero product recalls due to safety non-compliance registered in ERP system (D365).

5.3 Customer Satisfaction

Qualitative Objectives:

- Embed customer perspective in internal processes.
- Conduct customer satisfaction surveys through frequent customer contact by account managers.

Targets:

- By 2026, log all customer calls, visits and feedback in Hubspot software for analysis and continuous improvement of customer satisfaction.

6. List of Standard and Regulations by which we operate by*:

- Gedragscode Van der Valk Systemen B.V. (Code of Conduct)
- Cao Metalektro
- ISO 14001
- ISO 14040
- ISO 14064-1
- GHG Protocol standard
- HortiQ: BRL 8001
- VSME

**all laws regulations that companies based in the EU must comply with are not separately mentioned.*