



Air Spiralo DEC Group Code of Conduct for Business Partners

Our Commitment:

At Air Spiralo DEC Group, we believe that long-term business success is built on integrity, mutual respect and responsible business conduct.

We are committed to conducting business responsibly and to building a sustainable and ethical supply chain together with our customers, suppliers and business partners. We expect our business partners and suppliers to share this commitment and to embed the principles of sustainable and responsible corporate governance in their own organizations.

1. Compliance with Laws

- Comply with all applicable laws and regulations.
- Conduct business in accordance with internationally recognized principles of responsible business.

2. Business Integrity and Ethics

- Conduct business honestly, fairly and transparently.
- Do not engage in corruption, bribery, fraud, extortion, conflicts of interest that may influence business decisions.
- Business decisions are made solely on objective and professional criteria.
- Adhere to all applicable laws, regulations, and industry standards in every aspect of operations.

3. Human Rights and Respect

- Respect the dignity and rights of every individual.
- Provide a workplace free from: discrimination, harassment, bullying, violence.
- Prohibit: child labour, forced labour, modern slavery.
- Ensure fair wages and benefits in accordance with local laws and regulations.
- Respect freedom of association where permitted by applicable law.

4. Health & Safety

- Provide a safe and healthy working environment.
- Comply with applicable occupational health and safety regulations and continuously improve our safety standards.

5. Environmental Responsibility & Sustainability

- Minimise environmental impact
- Reduce emissions
- Use resources responsibly
- Improve energy efficiency
- Support sustainable sourcing
- Promote environmentally responsible products where applicable



6. Product and Service Quality

- Deliver products and services that meet contractual requirements, specifications, and industry best practices.
- Notify Business Partners promptly of any issues that may affect product and service quality, safety, or delivery timelines.

7. Export Control & Sanctions

- Comply with applicable trade, export control and sanctions regulations.

8. Confidentiality and Data Protection

- Protect confidential business information and intellectual property.
- Personal data is processed in accordance with applicable regulations.
- Protect Air Spiralo DEC Group's assets, confidential information and intellectual property against misuse or unauthorized disclosure.

9. Responsible Business Relationships

- Build long-term partnerships based on integrity, transparency, mutual respect, responsibility, trust.

10. Transparency and Documentation

- Maintain accurate and transparent records of transactions and operations including, where applicable: sourcing, outsourcing and production practices.
- Provide available documentation upon request to demonstrate compliance with this Code of Conduct.

11. Monitoring and Compliance

- Air Spiralo DEC Group reserves the right to conduct audits and assessments of its suppliers' facilities and practices to ensure compliance with this Code of Conduct.
- Any violations of this Code may result in corrective action, suspension, or termination of the business relationship.

12. Whistleblower Protection

- Reports made in good faith will be treated confidentially and without retaliation.

Declaration

Acknowledgement by AndorDynamo Beheer B.V. and all its subsidiaries,

Name: A.H.J. van der Sterre

Position: CEO AndorDynamo Beheer B.V.

Date: 01-07-2026