



Our principles and values for conducting business activities

'You must have integrity!'

We realise full well that Coöperatie TVM U.A. owes its existence to its members. We are aware of the fact that our relationship with you is based primarily on trust, which is after all the only way we can always meet our obligations to our customers.

Within TVM, we have set up 'game rules' for determining how we engage in business dealings with each other. We choose to treat each other trustworthy, professionally and with honesty and respect! And we expect you to comply with the applicable legislation and regulations.

This brochure briefly summarises our 'game rules'.



Arjan Bos, CEO

Cooperation with integrity

Gifts and invitations

One of TVM's core values is 'reliability'. This means that TVM does not wish to be exposed to corruption and avoids all possible conflicts of interest. Accepting or giving gifts or invitations to events can lead to deliberately or inadvertently influencing people in such a way that they are not able to make choices of their own volition. This is something that TVM does not want and it is the reason why we formulated the TVM regulations on gifts and invitations, which apply to all employees of the TVM group of companies. These regulations make a distinction between offering and receiving gifts and invitations. All offered and received gifts and invitations are reported, assessed and registered by TVM.

Knowing who we do business with

As part of controlled and sound conduct TVM has drawn up guidelines for working with partners (suppliers and intermediaries). In this way, TVM is able to identify any risks that may arise from collaborating with other companies and organisations. TVM has a specific policy for outsourcing critical and/or important operations and/or activities. TVM wants to know its customers to avoid being misused for the wrong purposes. TVM maintains an accurate overview of partner organisations to prevent TVM's integrity from being compromised. TVM does not want to do business with any person, company or organisation involved in corrupt activities.

Fraud

Actions or behaviour intended to deceive or mislead others will not be accepted in any way or form. All our employees are obligated to prevent fraud within our company and to report all (suspected) fraudulent activities. TVM is a co-signatory of the Protocol Verzekeraars & Criminaliteit (Insurers' Protocol against Crime). TVM's own policy on fraud, which is based on the protocol, is aimed at detecting (attempted) fraudulent activities as quickly as possible and limiting any consequential damage. If necessary, TVM will report fraudulent activities to the Openbaar Ministerie (Public Prosecution Department).

Anti-corruption policy

TVM has implemented various rules and procedures that directly facilitate actively pursuing an anti-corruption policy, for example, the aforementioned regulations for gifts and invitations, and the regulations for whistle-blowers', incident-reporting and additional functions.

Preventing conflicts of interest

TVM and its partners solely make their choices on a business/commercial basis and do not allow themselves to be influenced by personal interests.

Rooting out corruption

TVM is committed to carrying out its activities in accordance with ethical, professional and legal standards and in an honest, transparent and well-considered manner. TVM will not allow its employees or partners to engage in corrupt practices. TVM expects integrity in

all business activities and partnerships. TVM defines corruption as involvement in forms of bribery and/or conflicts of interest that undermine the integrity of and trust in TVM.

Careful handling of data

How does TVM handle data leaks?

Within TVM agreements have been made for handling data breaches (security breaches of personal data). Data breaches must be reported by telephoning +31 (0)528 23 53 43 or sending an email to helpdesktICT@tvm.nl. TVM has concluded agreements with all organisations that are regarded as data processors under the General Data Protection Regulation (GDPR). TVM has implemented appropriate technical and organisational measures to prevent unauthorised data processing, loss, unauthorised access, destruction and disclosure of personal information.

Guaranteeing the privacy of TVM's business relations

TVM treats data relating to its business relations with care, informs them about how their data is processed and implements safeguards to protect their rights. TVM is transparent about the use of personal data and the purposes for which it is collected. If necessary, the consent of the person concerned is requested.

TVM's guarantee of integrity

Preventing any appearance of corruption/conflict of interest/fraud

TVM guarantees its integrity and prevents (any appearance of) corruption, conflict of interest and fraud by making agreements with its employees about reporting incidents, taking on additional functions, and accepting and giving gifts. We have also drawn up rules of conduct and set them out in our Code of Ethics and Code of Business Integrity. Within our organisation, we pay attention to norms and values by regularly discussing them and addressing any arising issues.

The acceptance of additional functions by TVM employees

TVM believes it is important for its employees to be socially involved. Employees are permitted to have additional functions if the related activities can be combined with their position at TVM and if the conditions set out in TVM's policy on additional functions are met. Additional functions must be reported to TVM and then assessed to ensure that they will not lead to (the appearance of) conflicts of interest.

Getting in touch with TVM

TVM is open to its customers. If you, as a customer or partner, suspect that your and/or TVM's integrity has been compromised, please contact us by sending an email to compliance@tvm.nl. TVM's compliance officer will handle all reported violations confidentially.

The Coöperatie TVM U.A. trading as TVM verzekeringen and the legal entities with which TVM forms a group as referred Article 2:24b of the Dutch Civil Code.



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