

# 'Integrity concerns us all!'

We realise full well that TVM Cooperative Insurance Society owes its existence to its members. We 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 rules for determining how we engage in business dealings with each other. We choose to treat each other honestly, reliably, professionally and respectfully! And we expect you to comply with the applicable legislation and regulations.

This brochure briefly summarises our rules.



Michel Verwoest, 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 no able to 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. TVM reports, assesses and registers all offered and received gifts and invitations.

#### Knowing who we do business with

TVM has drawn up guidelines for working with partners (suppliers and agents) in the framework of conducting honest, transparent and traceable business operations. 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 its integrity from being compromised. TVM does not want to do business with any person, company or organisation involved in corruption activities.

## Fraud protocol

Actions or behaviour intended to deceive or mislead others will not be accepted in any way or form. All our employees are obliged to prevent fraud within our company and to report all (suspected) fraudulent activities. TVM is a co-signatory of the 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 Public Prosecution Service.

#### Anti-corruption policy

TVM has implemented various rules and procedures that directly facilitate actively pursuing an anti-corruption policy, for example, the aforementioned TVM regulations on gifts and invitations, whistle-blower regulation ('the internal reporting system'), incident-reporting and additional function rules.

### 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 corruption 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.

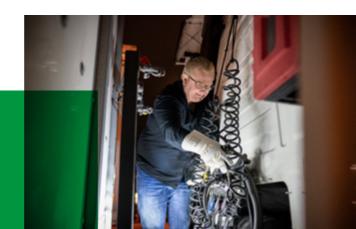
## Careful handling of data

### Reporting data leaks

Within TVM, agreements have been made for handling data leaks (personal data security breaches). Data leaks must be reported by telephoning +31 (0)528 29 29 99 or sending an email to compliance@tvm.nl. TVM has concluded agreements with all organisations that are regarded as data processors under the Personal Data Protactions Act. TVM has implemented appropriate technical and organisational measures to prevent unauthorised data processing, and the 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 Business Integrity. Within our organisation, we devote 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.

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.

### Reporting integrity violations

TVM endeavours to be transparent to 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.



