



Based on SHF's special social responsibility towards our customers, professional partners, and our colleagues, we give substance to integrity.

To give substance to integrity, we make agreements on how we want to work in an honest, transparent, and ethical manner. This integrity code helps us to make the right choices that we can justify for ourselves and for the outside world.

This integrity code is public and can be found on the SHF website. As a result, we are always accountable for the content.

OUR BASIC RULES

This integrity code aims to ensure that we properly interpret, assess, and weigh up our actions, taking the situation into account, and, if necessary, take action.

- Our collaborative relationship is founded on trust, but we do not act in a naïve manner.
- We are open and honest, even if something goes wrong.
- We discuss dilemmas with colleagues and learn from them together.
- We adhere to (the intent of) this code and act accordingly.

Whenever we are faced with situations in which integrity is a concern. To act with integrity, we must determine what that means for ourselves. It is not always 'black or white' and cannot be encapsulated in strict rules. The field of integrity often has a large gray area, there are doubts sometimes, and there is a need to learn how to make better decisions. The most important ones are listed below.

In all cases, if you are in doubt, discuss it with your manager or a co-worker. You can also contact our external confidential adviser (see also the whistleblower policy).

OUR RULES OF CONDUCT

SHF employees are SHF ambassadors. Not only at work, but also privately. For example, at a party or on social media. Always be aware of that.

Have respect for other cultures, lifestyles, or opinions. Are you at a customer's house? Then behave as a guest. Respect the privacy of customers, relations, and colleagues. Handle all personal and business sensitive data with care. Think of the things on your desk, access to your laptop/tablet and telephone. Only use your business passwords yourself.

Keep business relationships clean and stay independent. Be restrained in accepting business gifts. A small gift from a customer or relation as a thank you is possible. A dinner party or joint activity in a proposal phase is not appropriate. Also, no gifts may be sent to your private address.



For a tender, supplier selection or assignment, follow a clear and transparent procedure (procurement policy). Be accountable for your considerations and the choices you have made. Avoid the appearance of a conflict of interest where possible, although we understand that this can sometimes be difficult or even impossible on a small island. Always make a clear distinction between work and private life. And let your employer know that your relationship should never and cannot lead to personal gain. If there is no other option and you are going to do private business with a business relation of SHF, then you do this under market conditions. You also report this to the board.

Do you have direct or indirect personal interests that could conflict with the interests of SHF? Discuss it with the board. Do not give a business assignment to your own partner, family member, friend, or acquaintance. This includes additional activities such as voluntary work, board activities or starting your own business. Your work at SHF must not be compromised by your outside activities. Report all your outside activities, paid or unpaid, to the board. Do you doubt whether there is an appearance of conflict of interest? Then tune in with the board. You don't do ancillary activities that lead to (possible) integrity risks. You work together with colleagues, in a safe environment for everyone. We treat our colleagues with respect.

Undesirable behavior, such as sexual harassment, aggression, bullying or discrimination: it goes without saying that we do not tolerate that. We address our colleagues directly if inappropriate comments are made or inappropriate behavior is displayed. But more importantly, be aware of your own actions and the unwanted or unintended effect your words or actions may have on another.

ACT WITH INTEGRITY

If there is a (possible) integrity issue, go through these steps:

1. Signaling: of a possible moral question or integrity issue
2. Judging: come to a substantiated judgment
3. Act: Take action!

Acting is sometimes quite difficult. What do you do if you see something that is not acceptable?

- Talk to your colleague.
- If you can't figure it out or if you have doubts, report it to your manager.
- Talk with our external confidential adviser.

Do you really think there is abuse? Then follow the steps in our whistleblower policy.

FOR WHOM?

This code applies to all SHF employees, but also to the Board, Director and anyone who works for SHF.



FINALLY

Integrity is about people's actions, in this case about SHF. The integrity code is available on the internet and has been formally laid down, but it is much more important that the theme is felt and lived in the organization. This means that the theme is discussed in the introduction programs of new employees and supervisory directors. This theme is also regularly on the agenda in the board, especially because the board has an exemplary function (see Governance Code 2020 AEDES, see SHF as a guideline).