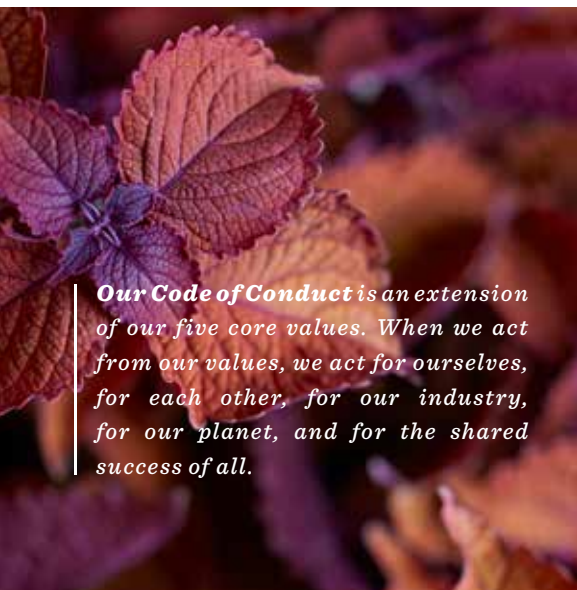




DÜMMEN
ORANGE®

CODE OF
CONDUCT



***Our Code of Conduct** is an extension of our five core values. When we act from our values, we act for ourselves, for each other, for our industry, for our planet, and for the shared success of all.*

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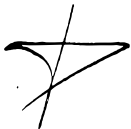
CODE OF CONDUCT *INTRODUCTION*

Our everyday actions make us who we are—and continually shape who we will become—as a business, a brand and a global example of kinder, wiser industry practices. For this reason, it is essential that we share not only our core values, but also a common code through which we can clearly understand and act on those values.

This Code of Conduct is not a book of rules. Rather, it is a living text that documents our respect for the impact of individual actions on our own lives and on the lives of our colleagues, customers, partners and the communities we all share. It is a vital contract to which we hold each other and ourselves. No matter how complex a single moral or ethical question may be, the answer—and the intent of this code—is straightforward: do what is right.

Be honest, welcoming, respectful and lawful. Be an up-stander and an advocate. As individuals, we innately understand and honour these values. As a global organisation, we recognise the need to set down basic standards for embodying them in our day-to-day experiences at Dümmen Orange. Our Code of Conduct shows us this vision. It is up to each of us, each day, to make it a reality. I have no doubt that we will.

Our behaviour is our success. I look forward to continuing to share our values and our success with you for years to come.



Hugo Noordhoek Hegt, CEO



OUR

VALUES

Our core values were not handed down or made up by a small, select group of leaders or experts. Each has been at the heart of the way we do business for generations. More than any name, logo or story, our values describe who we are as a company of like-minded individuals. We all work from the same foundation and toward the same vision.

Beliefs Become Behaviors

Our Code of Conduct guides us in our actions to embody our five core values. When we act from our values, we act for ourselves, for each other, for our industry, for our planet, and for the shared success of all.



PASSIONATE
PURPOSE



Passion lives in every moment and every detail of our work, uniting our brand, our people, and our planet in a vibrant cycle that's both sustaining and sustainable.



INSPIRING
CONFIDENCE



Trust is earned by doing business honestly, transparently, accountably, and reliably. This trust inspires confidence in our business relationships and pride in our legacy.



*BOUNDLESS
SOLUTIONS*



We are backed by unmatched R&D, operations, and marketing resulting in the development of boundless floriculture solutions, business opportunities and marketing support to create mutual success.



*EVOLVING
EXCELLENCE*



From products that outperform to leadership that outshines, we continually improve our standards of excellence leading to dynamic growth and deep-rooted success.



*EMPOWERING
EXPRESSION*



Flowers represent the best of our human nature including beauty, joy, and creativity —empowering us to connect, communicate and share every day.

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OUR BUSINESS PRINCIPLES

Integrity

Integrity means acting out of and in accordance with our basic principles: doing as we say, and saying as we do. We act honestly, responsibly and lawfully in all matters of business. We respect the universal rules of competition. We uphold our own names and reputations as well as those of our company—Dümmen Orange.

Honesty

We are truthful and trustworthy in all we say, write and do. We are forthcoming with our knowledge and feedback. We remain respectful and thoughtful of all those with whom we do business.

Responsibility

We understand our duties and are committed to performing them to the best of our abilities. We are accountable for our actions and decisions, and we hold others accountable in turn.

Legal Compliance

We understand, respect and comply with all local, state/provincial, national and international laws and regulations. These govern our business and the places in which we do business. We recognize that having knowledge of unlawful activity and not reporting it appropriately makes us complicit and culpable legally, morally and ethically.

Gifts & Favors

We understand that even gifts or favors given with purely good intentions may be inappropriate in context. We are sensitive to these complexities. We do not give or accept gifts, favors or hospitality, in any form, when the giver may—or may appear to—expect something in return.

Conflicts of Interest

We understand that personal and professional conflicts may arise in the course of doing business. For example, when an employee's interpersonal relationships interfere with their ability to lead fairly and objectively, or when an employee also works for other organizations. We are responsible for identifying, avoiding and reporting these conflicts or potential conflicts appropriately.

The following are some principal examples showing how our basic principles translate into specific expectations and applications in the course of everyday business. These principles help us to visualize our values in action, and give us a deeper, real-world understanding of the standards to which all Dümmen Orange employees are trusted to hold themselves and each other.



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OUR BUSINESS PRINCIPLES

Respect for People & Nature

We respect our fellow humans and the resources we all share. This means placing the highest values on our universal rights to dignity, equality and safety, and our universal need for a healthy environment.

Human Rights

We honor and uphold the United Nations' Universal Declaration of Human Rights (www.un.org/en/documents/udhr/), respecting that all people, regardless of race, color, sex, language, religion, political or other opinion, national or social origin, property, birth or other status, are entitled to the same, inalienable rights as equal members of our human family.

Health & Safety

We have the right to a healthy, safe and secure workplace. We will do our part to preserve and promote an environment in which we can all thrive. We are committed to knowing and complying with all current health and safety regulations and emergency plans. These measures will depend upon the unique circumstances of each location.

Harassment & Violence

We know that intolerance, intimidation and violence have no place at Dümme Orange. We are all entitled to feel safe and respected at work. We are unified in our zero-tolerance approach to sexual harassment, intimidation/extortion, aggression

and discrimination. We recognize that gossiping, bullying and teasing are harmful, and we choose to speak out rather than join in.

Alcohol & Drugs

We understand that smoking, alcohol and drugs can negatively affect our health, the health of those around us, and our ability to do our jobs well. While at work, we use such substances responsibly or not at all. If we smoke, we do so only in designated areas. If we drink alcohol, we do so with the express approval and oversight of leadership, such as when it is served during authorized company events. In such instances, we exercise moderation and good judgment.

Sustainability

We care about the health of our planet and are committed to working sustainably. We strive to understand, measure and improve the ecological impacts of our company's products, processes and practices. Dedication to sustainability also impacts our individual choices. We will work together to systematically reduce the negative environmental effects of doing business.



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OUR BUSINESS PRINCIPLES

Confidentiality

Transparency is essential to our business philosophy, as is earning and keeping the confidence of our colleagues, customers and partners. Doing both well means respecting the difference between information that is open, public or publishable, and information that is private, proprietary or protected. We treat all information, knowledge and intellectual property with care.

Intellectual Property Rights (IPR)

We recognize that, in our industry, IPR such as patents, plant breeders' rights and trademarks are vital assets that differentiate competitors from each other. We will protect Dümme Orange's IPR to the best of our abilities. We also fully respect the IPR of others.

Social Sharing

We understand that we are free to share personal information, photographs, videos and other content via our personal social media accounts. We also understand that how we use such media can have positive and/or negative effects on our work, professional reputations, professional success, and that of Dümme Orange. We make clear distinctions between what constitutes personal and professional use of social media. We uphold the very simple rule at the basis of Dümme Orange's social media policy : If it's inappropriate in normal social life, it's probably inappropriate on social media too.

Nondisclosure

We value the trust placed in Dümme Orange as an employer, provider and business partner, and respect the role of nondisclosure in earning and keeping that trust. We understand that "confidential information" means any information that is not currently public, such as strategic plans, sales figures, financial information, information regarding negotiations, agreements or dealings between Dümme Orange and others, human resources information, trade secrets, patents, trademarks, and similar information from customers or partners. We protect such information, regardless of whether it belongs to Dümme Orange, our customers or partners, or previous employers. We will share it only if we are legally required or authorized by Dümme Orange to do so. We are responsible, when storing or transmitting confidential information, to prevent it from being obtained by unauthorized parties.





**RESPECTING
THE CODE
OF CONDUCT**

Be Empowered

In order to bring value to Dümnen Orange, this Code of Conduct must first have value to you. Every Dümnen Orange employee will receive a copy of our Code of Conduct. Read it. Understand it. Accept and apply it as your own, because it is. Our Code of Conduct is based on what matters to all of us. It is created explicitly to aid us in treating each other and our company name with the same respect we desire and deserve for ourselves.

As a living document, our Code of Conduct also compels us to maintain an open and cooperative environment in which we feel empowered to ask questions, raise concerns and resolve dilemmas concerning its interpretation and application.

Those of us who have earned responsibilities over and above our peers—managers, directors, executives and other leadership—are duly obliged to uphold the Code of Conduct and to lead by example in all matters of compliance. However, each of us, at every level, is expected to always do our best to do what is right. That includes preventing, questioning and reporting what we believe to be wrong.



NONCOMPLIANCE & REPORTING

Do Right, No Exceptions

Noncompliance means, simply, failing to do what is right. Acts of noncompliance can be clear and undisputable, or subject to interpretation and further investigation. We trust you, our employees, and expect you to act with good intentions. This trust, as well as our Code of Conduct and our company's commitment to settling matters fairly, fully and firmly, guides every aspect of our approach to noncompliance, reporting and resolution.

Noncompliance

We understand that failing to uphold our Code of Conduct, whether intentionally or through ignorance or negligence, can have swift and serious consequences for all involved—including Dümme Orange. We respect our company's commitment to treat all matters of noncompliance and suspected noncompliance fairly, fully and firmly. We understand that some matters may be subject to consequences above and beyond those imposed by Dümme Orange. We recognize that using a third party or other means to bypass this Code of Conduct is prohibited. We further understand that violations of this Code of Conduct may lead to disciplinary measures, including dismissal.

Reporting an Incident

We recognize that silence and apathy can do far more damage than timely, thoughtful reporting. We are committed to communicating known and suspected acts of noncompliance to those who have the authority to resolve them quickly and correctly. As such, we will respect the Reporting Procedure as outlined by Dümme Orange and abide by it. We understand that failing to do so is, in itself, a violation of our Code of Conduct and may be treated as such.



Reporting Procedure

For the comfort, confidence and convenience of our employees, Dümnen Orange uses a two-channel reporting system.

First Channel:

Speak to your direct manager or HR manager. She/he will be able to provide further clarification of policies, offer advice, and help resolve or escalate the issue as necessary.

Second Channel:

If your direct manager or HR manager is or may be involved in the suspected violation or if you are uncomfortable speaking with them directly, you can report any suspected violation by sending an email to *ConfidentialAdviser@DummenOrange.com*, as further detailed in the Dümnen Orange Whistleblowing Policy.

Non-Retaliation

Dümnen Orange protects its employees from any retaliation arising as a result of reporting known or suspected noncompliance. Provided you have acted in good faith and are not culpable for the reported act, you will experience no negative consequences for reporting it through the appropriate channels. Dümnen Orange further recognizes and respects the need for confidentiality and nondisclosure regarding the content of a report and any information leading to the report or related to its investigation and resolution.

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CEO'S CLOSING

Commitment

I do not believe in creating rules for every instance and interaction. Rather, I am confident that Dümmer Orange and all our employees can continue to succeed on the basis of our shared values.

Therefore, I hereby commit to you my own promise to uphold this Code of Conduct, the values on which it is founded, and the everyday standards of good business and good behavior that it commends. I trust you will make the same promise to me and to all of your colleagues.

Remember that however complex the question, the answer is simple: do what is right.



***DÜMMEN ORANGE
WILL DO RIGHT
BY YOU.***

OUR BEHAVIOR IS OUR SUCCESS

DummenOrange.com
