

CODE OF CONDUCT HAVO B.V.

Havo b.v. is a Dutch family-owned company that has been manufacturing modelling materials and paints for children, hobbyists and artists since 1963. With over 55 years of expertise and craftsmanship, and the latest technologies and insights, we manufacture inspiring products that are used around the globe.

Product safety is at the core of everything we do, because children, hobbyists and artists have to be able to experiment, discover and create with our products safely.

Aside from making responsible products, we also ensure that our production methods are sustainable and environmentally friendly. The following statements are pursued in our organisation on a daily basis.

Product safety:

- CE-label and REACH. Children's products can be identified by the CE-label. These products meet the strict EU requirements regarding toy safety legislation, which includes limits for heavy metals. In addition, our products comply with the REACH legislation, the European legislation for chemical substances.
- Product safety is closely tied to product quality. Our quality management system ensures that we are able to create high-quality, safe products. This is confirmed by the fact that Havo b.v. is ISO 9001 certified.

Occupational health and safety legislation:

- Havo b.v. complies with the Dutch occupational health and safety legislation.
- As a Dutch employer, Havo b.v. ensures that the individual working spaces of its employees meet the requirements of the Dutch health and safety legislation.
- For each working space, a RI&E (Risk Assessment and Evaluation) will be drawn up periodically by an expert of the Dutch occupational health and safety legislation; any areas of improvement will be adequately addressed by Havo.
- Personal protective equipment is provided for employees working in production and used when necessary.
- Havo b.v. has all legally required permits regarding electricity and fire safety.
- The fire department periodically assesses fire safety.
- Our fire alarm system is directly connected to the nearest fire department.
- There are several emergency response officers within our company who receive regular health and safety training. First aid materials and defibrillators are available.
- Havo b.v. employs several people with an occupational impairment.
- We ensure that all our machinery comply with European Safety Standards for machines. A Factory Acceptance Test is standard procedure when we buy a new machine. With this FAT we ensure that the European Safety Standards are met.

Working conditions:

- Our wages meet the applicable local law. Overtime is completely voluntary and is paid at a premium rate.
- We keep records for each worker of the hours they have worked and the payment that is due.
- Working hours comply with national law and industry standards. None of our employees work more than 48 hours, or more than 12 hours overtime, a week on a regular basis. Employees are provided with at least 2 days off for every 7 day period on average.
- All workers receive the same rights, benefits and opportunities for advancement as other workers performing similar activities.
- Physical abuse or discipline, threat of physical abuse, sexual or other harassment, verbal abuse, and harsh or inhuman treatment is prohibited and will be dealt with appropriately. Our workers have access to confidential means of reporting inhumane treatment and workplace grievances.
- Under no circumstances does Havo b.v. engage with money laundering, insider trading, fraud, bribery, corruption and/or other improper payments or gifts. No unauthorised access to personal and business information is provided at any time.

Child labour:

Our own branded and private label products are manufactured without "exploitative child labour". A "child labourer" is defined as a child who regularly works various hours a day. "Exploitative child labour" captures:

- all forms of forced labour, bonded labour, peonage and slavery

- abuse of children, e.g. prostitution, pornography, drug-trafficking, child soldiers
- all other forms of labour that threaten the healthy, safety or moral well-being of children. This includes heavy work in natural stone quarries.

Funding agencies against child labour usually follow a simpler definition of child labour: "a person below the age of 14 who is unable to attend school since he or she has to work." We follow this definition as well.

Identification Requirement Act:

- In accordance with the Dutch Identification Requirement Act we check the ages of our applicants and workers and keep proof of age records on file for each employee. This way, we ensure that child labour is prevented.

Environmental measures:

- Havo b.v. has one location for production, storage and distribution of its products and raw materials. This prevents unnecessary transport and, with that, pollution.
- When purchasing our raw materials, we consciously choose for innovative and sustainable suppliers in Europe to minimise transportation.
- Recyclable plastic packaging: The direct containers (bottle, tube, cap) are made of recyclable plastic (PE/PP). The plastic bottles and caps are made in-house. The residual material is immediately crushed and reused as a resource. By producing these packaging materials in-house, there is no unnecessary transport. In addition, we're processing bio-plastics in our packaging as well. These plastics are made from renewable resources and can help to reduce the impact on the environment.
- We use non-environmentally harmful raw materials in both the product and the packaging. A few examples are Creall Eco color, which carries the Nordic Eco label, and Creall modeling materials, which are only available in buckets made of recycled material. In addition, the Creall sets in plastic boxes will be phased over to Blue PET boxes in the near future, which are also made from recycled material.
- FSC-certified paper: All secondary packaging is made of FSC-certified paper. The FSC-label guarantees that the cardboard is made of trees originating from a sustainably managed forest. Every step in the production process of the cardboard must be certified before the cardboard is allowed to carry the label.
- Many of our gouaches consist of 98% natural raw materials. If excipients are needed to guarantee product quality and safety, we always make a responsible choice. In addition, our paints, modelling materials and adhesives do not contain any animal components.
- A significant part of our energy is generated by our solar panels. This results in an annual CO₂-emissions reduction of 50 tons.
- In order to preheat the process water, we use a heat recovery system on several machines.
- Our building is lit by energy efficient lighting.
- We use correct waste separation in our production facility
- Investigations concerning saving energy are performed regularly and the results of these investigations are implemented.
- To reduce the solid content in our wastewater, we make sure it is purified by our water cleaning system before it is offered to the wastewater treatment plant.

With this document we trust we have informed you sufficiently that there are no concessions made to our products, to the well-being of our employees and to the environment we all share.

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Annemieke Zwiers- Vos
Managing director