

MET GROUP CODE OF CONDUCT

Introduction

The Code of Conduct sets out the ethical principles that govern the way MET Group does business.

The code of conduct can only serve as general guidance and is not intended to cover every possible situation. Consequently, as part of this Code of Conduct, MET Group expects all Staff to apply common sense and to ask for help or guidance regarding any question about behaviour in specific situations by consulting with their direct superior or any member of the MET Group Compliance Committee.

The principles in the Code of Conduct can be supplemented by additional documents including directives and policies. In case of a difference between the Code of Conduct (or other supplemental documentation) and local laws or regulations, the stricter rules shall apply.

Ethical Principles

Integrity, fairness, mutual respect, professionalism and transparency are the cornerstones of MET Group's business behaviour. These principles govern our conduct towards our work colleagues as well as business partners, customers, authorities and the public.

MET Group expects Staff to always act in an appropriate and responsible manner. Violence, discrimination and harassment are not tolerated.

Compliance with Laws and Regulations

All applicable laws and regulations as well as internal rules, instructions and procedures must always be adhered to by all Staff. Staff must familiarise themselves with the standards that are relevant to their professional activities.

MET Group puts a special focus on the integrity of its business partners.

MET Group complies with all applicable anti-money laundering and anti-terrorism financing rules as well as the relevant sanction regimes.

Conflicts of Interests

Staff's personal, family or other ties can conflict with the interests of MET Group, its business partners or customers. Staff is asked to avoid any situations which could give rise to (deemed) conflicts of interests, or – when it cannot be avoided – immediately inform the direct superior or any member of the MET Group Compliance Committee to find a mutually acceptable way of dealing with the situation.

Staff may actively participate in civil society outside work hours, including political activities. Such engagement must be in line with the ethical values of MET Group and not conflict with the role of the relevant member of Staff.

Confidentiality

Information and trade secrets that are confidential or not otherwise made public must be handled with care. Confidential and non-public information and trade secrets may only be passed on internally or externally in compliance with the applicable internal rules both during the employment (or similar) relationship with MET Group as well as thereafter. Confidential and non-public information must be protected against unauthorised access by appropriate legal, technical and organisational measures.

All Staff must take special care whenever dealing with personal data as well as other particularly sensitive information such as strategies, planned mergers and acquisitions, pending business transactions, price calculations, bids or imminent personnel changes in corporate functions.

MET Group requires all its employees, managers and other stakeholders to be familiar with (IT) security policies and regulations. Passwords, badges and keys must be protected and not handed to third parties.

External Representation

Only members of Staff who are granted authority to do so, must communicate internally and/or externally on behalf of MET Group.

When dealing with stakeholders, Staff shall always conduct itself in a cooperative, open and respectful manner.

Professional and Financial Integrity

Staff shall safeguard the financial interest of MET Group. MET Group expects its Staff to portray a true, accurate and objective image of MET Group.

Staff must protect MET Group's assets (including any items entrusted to them by MET Group) against loss, damage, misuse, theft, fraud and the like, and to limit non-business-related use to a reasonable extent.

Bribery and Corruption

Obtaining or offering personal advantages (monetary or other favours) in order to improve MET Group's position vis-à-vis (government) officials, competitors, business partners and other third parties is prohibited.

Any bribes offered to Staff, must be reported without delay to any member of the MET Group Compliance Committee. Accepting and bestowing customary gifts, benefits and invitations of a minor value is permitted. If there is any doubt whether gifts, benefits or invitations are appropriate, the direct superior or any member of the MET Group Compliance Committee must be contacted. Cash gifts, irrespective of the amount, must not be accepted nor offered.

Appropriate charitable donations are permitted, subject to prior consultation with management.

Health and Safety

Healthy, capable and motivated Staff are essential to MET Group's long-term success. The safety and protection of people and the environment are a priority at MET Group.

MET Group designs all workplaces to comply with recognised health and safety requirements. Special attention must be given to health and safety requirements for all physical work conducted outside the office environment.

MET Group conducts on-going training and information to all Staff in relation to safety standards. Each line manager is responsible for protecting the health and safety of his or her Staff and will be trained accordingly.

Inadequacies and infringements of occupational safety or health standards must be reported immediately in line with the relevant internal rules or to any member of the MET Group Compliance Committee.

MET Group is committed to protecting the health and safety of third parties who are located within MET Group's sphere of influence (e.g. as a service provider or a visitor).

Sustainability and Social Responsibility

MET Group takes responsibility for environmental protection and sustainable management of natural resources. We acknowledge that quality of life for future generations can only be preserved by respecting recognised environmental standards.

MET Group takes actively part in dialogues with relevant stakeholder groups and supports selected programs to make a positive impact on civil society.

Reporting and Dealing with Violations

The rules set out in the Code of Conduct form an integral part of and reflect MET Group's business culture. All Staff are responsible for ensuring that these rules are always adhered to.

MET Group does not tolerate violations of the Code of Conduct and will take appropriate actions depending on the severity of the violation and the degree of fault. Possible disciplinary measures include warnings, reprimands and dismissal (for cause). In cases of serious infringements, MET Group reserves the right to inform criminal prosecution authorities and/or to instigate proceedings under civil law.

MET Group encourages all Staff to report any serious violations of the Code of Conduct to the direct superior or any member of the MET Group Compliance Committee. All cases reported will be treated in the strictest confidence possible.