



**ACTM Visual B.V.**

Hoofdstraat 52a  
2171 AT Sassenheim  
The Netherlands  
Tel. +31 (0) 6 53166747  
actermeulen@actmvisual.com

## **ACTM Group B.V. Code of Conduct – Corporate Social Responsibility**

### **Preamble**

The ACTM Group B.V. and its member companies affirm their Corporate Social Responsibility (CSR) as a part of their global business activities. ACTM's Code of Conduct for Corporate Social Responsibility (hereinafter called 'CSR') acts as a guideline in the industry regarding working conditions, social and environmental compatibility, transparency, collaboration and dialog that is marked by trust.

Developed and agreed to by all its member companies, the content of this CSR is an expression of our collective core values as they are defined in the vision and mission statements and especially as they are affirmed in the social market economy.

This CSR is designed as a self-imposed obligation that can be signed by member and partner companies. This CSR assists us in responding to different general conditions in a global market and in facing challenges and social expectations that come from intensified collaboration from within the value chain.

### **1. Basic Understanding of Social Responsibility in Corporate Management**

A mutual, basic understanding of social responsibility in corporate management forms the basis of this CSR. This means ACTM assumes responsibility by bearing in mind the consequences of its business decisions and actions on economic, technological, social and environmental levels and brings about an appropriate balance of interests. ACTM voluntarily contributes to the well-being and long-term development of a global society at every point it can and in the locations where it is in business. It is geared towards universally held ethical values and principals, especially integrity, honesty and respect of human dignity.

### **2. Where the CSR applies**

2.1 This CSR is in effect for all ACTM Group companies and business units worldwide.

2.2 ACTM commits to promoting adherence to the content of this CSR at every point it can for its suppliers and in other parts of the value chain.

### **3. Core Values for Social Responsibility in Corporate Management**

ACTM will proactively work to ensure that the values mentioned below are put into practice and adhered to, both now and in the future.

#### **3.1 Adherence to Laws**

ACTM will abide by the laws in effect and other legal requirements of the countries where it is in business. For countries that have a weak institutional framework, the company will carefully examine what good company practices from their home country should be applied to enable supportive, responsible company management.

#### **3.2 Integrity and Organizational Governance**

3.2.1 ACTM gears its activities towards universally held ethical values and principals, especially integrity, honesty, respect of human dignity, openness and non-discrimination based on religion, ideology, gender and ethnicity.

3.2.2 ACTM rejects corruption and bribery as stated in the relevant UN Convention. It uses suitable means to promote transparency, trading with integrity, responsible leadership and company accountability.

3.2.3 ACTM pursues clean and recognized business practices and fair competition. In regards to competition, it focuses on professional behavior and high standards of quality for work. It fosters partnership and trusting interaction with the supervisory authorities.

### 3.3 Consumer Interests

To the extent consumer interests are affected, ACTM abides by regulations that protect the consumer, as well as appropriate sales, marketing and information practices. Groups that are in special need of protection (e.g. protection of minors) will receive special attention.

### 3.4 Communication

ACTM will communicate in an open way and is oriented towards dialogue about the requirements of this CSR and about its implementation among employees, clients, suppliers and other stakeholders. Every document and all information will be duly produced. They will not be unfairly changed or destroyed. They will be properly stored. Confidential company information and partner's business information will be handled sensitively and will be kept in confidence.

### 3.5 Human Rights

ACTM is committed to promote human rights. It respects human rights stated in the Charter of the United Nations, especially those named in the following:

3.5.1 Privacy. Protection of privacy.

3.5.2 Health and Safety. Ensuring health and work safety, especially the guarantee of a safe and health-promoting work environment, avoiding accidents and injuries.

3.5.3 Harassment. Employee protection against bodily punishment and against physical, sexual, psychological or verbal harassment or abuse.

3.5.4 Freedom of Conscience. Protection and guarantee of the right to freedom of conscience and freedom of expression.

### 3.6 Working Conditions

ACTM abides by the following core work standards from ILO (International Labour Organisation):

3.6.1 Child Labour. The prohibition of child labour, i.e. the employment of persons younger than 15 years old, as long as the local legal requirements do not specify a higher age limit and as long as no exceptions are permitted.

3.6.2 Forced Labour. The prohibition of forced labour of any kind.

3.6.3 Wage Compensation. Work standards concerning compensation, especially in regards to the level of compensation as stated in the laws and requirements that are in force.

3.6.4 Employee Rights. Respecting the rights of the employee to freedom of association, freedom of assembly and collective bargaining, as long as this is legally permitted and possible in the respective country.

3.6.5 Prohibition of Discrimination. Treatment of all employees in a non-discriminatory fashion.

### 3.7 Hours of Work

ACTM abides by work standards concerning the longest permitted time of work.

### 3.8 Environmental Protection

ACTM fulfils the requirements and the standards for environmental protection that affect their operations and acts in an environmentally conscious way at all locations where it is in operation. For additional responsibility with natural resources, it holds to the principles from the Rio Declaration.

### 3.9 Civic Commitment

ACTM contributes to the social and economic development of the countries and regions where it is in business and promotes appropriate, volunteer activities information by its employees.

## 4. Implementation and Application

ACTM will make every appropriate and reasonable effort to implement and to apply the principles and values described in this CSR both now and in the future. Contractual partners will be informed about the basic measures upon request and within the scope of a reciprocal cooperation, so that it becomes observable how these measures are fundamentally guaranteed. No right exists to disseminate operational or business secrets related to competition or any other that is in need of protection.

The Code of Conduct expresses our own commitment to corporate social responsibility, and it is our sincere hope that as many companies as possible will adopt it.

### GENERAL DOCUMENT DATA

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