



FrieslandCampina   
nourishing by nature

*FrieslandCampina*

# Policy on avoiding conflicts of interest



We ensure our own personal interests are not in conflict with those of our company

## Why this policy?

At FrieslandCampina, we want to do business in the right way. We act with integrity and transparency towards each other and our employer. This means we avoid situations where our personal interests could interfere with the interests of the company.

This policy helps you recognise and manage potential conflicts of interest. With these rules we aim to preserve the trust of our employees, suppliers and customers, and safeguard our good reputation. Conflicts of interest can have serious consequences for the company and the employees involved, including disciplinary action.



## What is a conflict of interest?

A conflict of interest arises when your personal interests could influence - or appear to influence - your decisions or actions at work. These situations can occur more easily than you might think.

Below are some common examples:

Category	Example
Recruitment of family or friends	You help your cousin getting a job at FrieslandCampina by influencing the hiring procedure
Business with family or friends	You are responsible for hiring a marketing agency and select your friend's agency instead of one of our preferred suppliers
Personal relationships at work	You have a romantic relationship with one of your team members
Secondary employment	Next to your job at FrieslandCampina you work as a consultant for a competitor
Personal business interests	You hold shares in a company that does business with FrieslandCampina
Expressing personal opinions	On social media you publicly share views that conflict with the interests of FrieslandCampina

### Gifts & hospitality

Be aware that receiving gifts, travel or hospitality can also create a conflict of interest. These may influence your ability to make objective business decisions.

You can find detailed guidance in our [Gifts & Hospitality policy](#).

### Appearance and perception

Avoiding conflicts of interest is not only about actual conflicts, but also about how situations may *appear* to others. For example: if a family member is hired for a job in your department, it may look like a conflict of interest, even if you were not involved in the process.

In these cases, transparency is essential. If the situation can raise questions, disclose any personal connections and make it clear that you are not involved in the decision-making process.

## Our rules

When you are dealing with an actual or potential conflict of interest, follow these key rules:

- **Business with family or friends:** Do not do business on behalf of FrieslandCampina with your family members, friends or others with whom you have a personal relationship. Please see below who is considered a 'family member'.
- **Involvement in hiring family or friends:** Do not take part in recruitment processes involving your family members, friends or others with whom you have a personal relationship. Please see below who is considered a 'family member'.
- **Personal relationships at work:** Do not have a romantic, sexual or close relationship with a colleague who reports to you or to whom you report, directly or indirectly. If you work in the same department, disclose the relationship to your manager or HR People Advisor and follow their instructions to avoid a conflict.
- **Secondary job:** Do not have a secondary job, advisory role or board position at a business partner or competitor, or that otherwise conflicts with the interests of FrieslandCampina, without prior written approval from your HR People Advisor. You can request approval through Finder and granted approvals will be registered in HoRizon.
- **Financial interests:** Do not have a financial interest in, or ownership of, a business partner or competitor, or that otherwise conflicts with the interests of FrieslandCampina, without prior written approval from your manager. Neither ask family members or friends to have such financial interests. You can request approval through Finder and granted approvals will be registered in HoRizon.
- **Business opportunities:** Do not use business opportunities which you learn about during your work for personal gain, even in case FrieslandCampina decides not to pursue the opportunity, without prior written approval from your manager. Neither ask family members or friends to use such business opportunities. You can request approval through Finder and granted approvals will be registered in HoRizon.
- **Expressing conflicting views:** Do not as an employee of FrieslandCampina publicly express personal or political views that conflict with the interests of FrieslandCampina. If in doubt, make it clear you are speaking in a personal capacity. If you are expressing views on social media, please follow our [Social Media Guidelines](#).
- **Executive Board and Supervisory Board:** Specific conflict of interest rules apply for members of the Executive Board, the Executive Team and the Supervisory Board.

### Who is considered a 'family member'?

- Spouse, registered partner or other life companion
- Parents, children, siblings
- In-laws and step-relatives
- Other relatives by blood or marriage such as grandparents, uncles and cousins
- Anyone with whom you have a close personal relationship, such as a cohabiting partner

## How to handle a conflict of interest situation

To manage an actual or potential conflict of interest, take the following steps:

### 1. Recognise

Be alert to situations where your personal interests may conflict with those of the company. If unsure, ask for advice.

### 2. Disclose

Share the situation as early as possible with your manager - before taking any action. Be open and specific about your personal interest. Discuss it with your manager and anyone else involved in the decision-making.

### 3. Resolve

Work with your manager to find a suitable solution. This may vary depending on the situation. Below you see a list of possible solutions for various situations. Always confirm the disclosure and the agreed actions in writing to avoid misunderstandings. In some situations you will have to request formal approval through Finder, which will be registered in HoRizon (see 'Our rules' above).

For further advice on how to deal with conflicts of interests you can contact the Ethics & Compliance team at [businessconduct@frieslandcampina.com](mailto:businessconduct@frieslandcampina.com).

#### Examples of solutions

- Exclude yourself from the decision-making process – for example, if a family member applies for a job at FrieslandCampina
- Change roles or reporting lines – for example, if there is a personal relationship between an employee and their manager
- Decline external speaking opportunities – if the topic involves sharing your personal views that conflict with the FrieslandCampina's position
- Take measures to protect FrieslandCampina's confidential information – by taking steps to prevent unauthorised access or disclosure
- Refuse gifts or hospitality – if they could influence a business decision
- End a secondary job or business interest – if it creates a conflict with the interests of FrieslandCampina
- Sell or transfer assets – for example, giving up shares in a company that creates a conflict

## Speak Up

We encourage employees to speak up about any suspected violations of Compass. We strive for a culture without fear of punishment or unfair treatment for raising concerns. If you are worried about something wrong happening at work, please report it. You will be protected. Our Speak Up procedure will guide you on how to raise concerns.

Information on how to Speak Up can be found here: [Speak Up](#)

“ My brother-in-law owns a transport company that could offer services to the FrieslandCampina plant where I work. I shared his company’s details with our procurement team, but I was completely transparent about our family connection. I made it clear that I would not be involved in the selection process.