DLL Code of Conduct

Doing the right thing, every day

Connecting beyond

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When you see this icon there is an associated policy which can be found under the chapter **Global Policies**.

Introduction by the CEO

"Each one of us has a responsibility to ensure that we do business and interact with our colleagues, customers, partners and third-party providers by taking personal ownership, treating each other with respect, demonstrating professional integrity and adhering to the highest standard of business ethics."

Dear members,

I'm delighted to present our Code of Conduct. At DLL, we believe that doing business the right way is key to our success as a major global company. That's what this Code of Conduct is all about.

As a financial institution supervised by the Dutch Central Bank and the European Central Bank, and as a 100% subsidiary of Rabobank, DLL must adhere to the highest standard of ethics and integrity. Sometimes doing what's right is easier said than done. There are times when we all could use a little help to feel confident that we are making the right choices.

Our Code of Conduct is meant to:

- Help you understand your ethical responsibilities arising from both regulations and our own standards for doing business; and
- Highlight the importance of recognizing and responding appropriately to compliance issues and ethical dilemmas in the workplace.

Each one of us has a responsibility to ensure that we do business and interact with our colleagues, customers, partners and third-party providers by taking personal ownership, treating each other with respect, demonstrating professional integrity and adhering to the highest standard of business ethics. In other words, it is all about doing the right thing every single day. Our values along with essential behaviors are there to guide our daily interactions, decision-making and personal development. I hope you will find this Code of Conduct clear and relevant to the situations you may find yourselves in. Serving as a compass for the right behavior, it can help you to recognize certain compliance issues and ethical dilemmas. It also offers you guidance on how to reflect on possible dilemmas and "gray areas" that you may encounter. And, of course, it directs you to the relevant people or policies that can give further guidance.

I encourage you to keep this document at hand for reference. In everyday terms that comes down to this: When faced with an ethical dilemma, before you make a choice, ask yourself how you would feel if it were called out at one of our All Member Meetings:

- Would it make me proud?
- Would it make my family proud of me?
- Would I be embarrassed or would DLL or anyone else be harmed?
- What would my colleagues think of me?

This Code of Conduct applies to everyone who works at DLL: temporary and permanent staff members, directors and supervisory directors. Alongside this Code of Conduct, specific codes, principles and guidelines may apply to each area of expertise and role performed. Let's work together to put this Code of Conduct into practice every day.

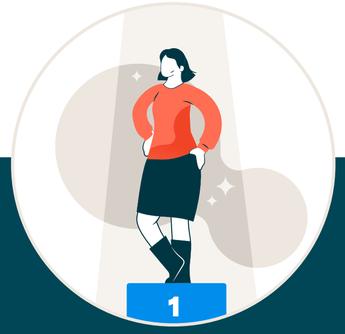
Kind regards,
On behalf of the Executive Board,
Lara Yocarini
CEO and Chair DLL Executive Board

Our values

Members are expected to behave in accordance with DLL's core values and behaviors outlined on MyDLL.

While using this Code of Conduct, bear in mind DLL's company values, because **without personal ownership and professional integrity, business ethics are just empty words**.

We put our customers first



This value underscores our commitment to both our customers and partners.

With this value we strive for "win-win" partnerships based on trust and mutual respect, fostering loyalty and advocacy.

Together we achieve more

This value emphasizes our commitment to inclusion and collaboration across DLL.

With this value we create a culture where members feel included, respected, and empowered to contribute their best work.

You can count on me

This value reflects our commitment to accountability and integrity.

With this value we foster a culture of honesty and openness, where members can rely on each other.

I challenge myself and others to grow

This value reflects our passion for personal and sustainable business growth.

With this value we foster a daring culture that thrives on continuous learning and improvement.

1 Our responsibilities

Everyone at DLL is responsible for complying with the Code, acting in the spirit of the Code and for embedding the DLL values every day. Our policies, standards and procedures give you further guidance on what the Code means to us.

To support you as a DLL member, you receive mandatory and role-based training on a regular basis which makes you aware of good conduct and responsibilities. Annually, we ask you to attest to your compliance with our Code of Conduct and our key policies and standards.

Your role as a member

Based on DLL's principles of openness, integrity and respect, we expect you as a member to:

- Strive to ensure no harm comes to DLL, members, prospects, customers, partners or third-party providers through acts of recklessness or negligence.
- Show appropriate and ethical behavior in workplaces or events inside and outside business hours.
- Ask if you are not sure what to do.
- Immediately speak up if you think that the law and regulations, our policies, standards and procedures or the Code have been or are about to be violated.

Do's

- Avoid inappropriate behavior and refrain from involving others in inappropriate behavior.
- Contribute to the integrity of the financial markets conducting the right behavior in and outside DLL.

Do you abide by these standards? Ask yourself

- Do I go above and beyond what the letter of the law demands from me?
- Do I always act in line with the spirit of our DLL values?

Your role as a manager

Our managers are expected to act as role models. As a manager, you are responsible for embedding effective management practices, compliant with the Code and driving an ethical culture. Based on your role in safeguarding ethical behavior and showing exemplary behavior, we expect all managers to:

- Show exemplary behavior. All managers are required to build on ethical considerations in business planning and decision-making, to empower our members to make responsible decisions, and to create a safe environment in which members can speak up when ethical challenges arise.
- Supervise your team, customers, partners and third-party providers effectively to make sure that they are following relevant policies and procedures.
- Clearly communicate expectations, setting the right tone and guiding your teams' understanding of their own responsibilities in relation to conduct.
- Treat everyone equally, consistently and fairly, whatever their seniority is, in line with our principles when dealing with conduct issues.
- Learn and apply lessons from past events.
- Include conduct-related behavior in decisions on managing performance and reward.
- Make sure your team understands and commits to the Code every year.
- As a leader, you are also expected to create an inclusive culture by:
  - Holding yourself accountable for fostering an inclusive work environment where all members can thrive.
  - Ensuring all perspectives are considered in hiring, promotions and decision-making.
  - Proactively addressing bias and inequities within your team.

Do's

- Promote and commit to the Code, Speak Up and our DLL values, and guide members to do the right thing.
- Make sure your team completes mandatory training in a timely manner and that members complete mandatory training tests on their own.
- Do carefully assess the potential impact of your decisions within the organization.

Do you abide by these standards? Ask yourself

- Am I acting as a role model?
- Am I considering the implications of any decisions I make?
- Am I assessing whether there are activities or risks within my business area that could undermine good conduct?
- Am I aligning strategic decisions while delivering fair outcomes, helping my team to use good judgment and make ethical, balanced and informed decisions?
- Am I walking the talk about diversity, equity and inclusion, preventing harassment and discrimination?

2 Trust, respect and dignity

DLL strives to create an environment characterized by trust, respect and dignity, in which we are committed to a common purpose and always feel empowered in our workplace.

Diversity, equity and inclusion

We aim to develop a diverse and inclusive workforce by embedding diversity, equity and inclusion (DE&I) into our talent strategy, leadership accountability and workplace culture. This includes equitable hiring practices, transparent career progression, and fostering an environment where all members have equal opportunities to thrive.

We want to be an *employer of choice* through the creation of a positive, responsive and open working environment in which we welcome different perspectives and have open dialogues on DE&I. We want you to experience DLL as a workplace that is inclusive and trusting, where everyone feels welcome, heard and valued and can be their authentic self.

Your role as a member

We expect you to contribute every day to creating a positive, responsive and open working environment.

Harassment and discrimination

At DLL, we want to create safe workplaces in which each member feels accepted and welcomed for who they are. In the workplace we want to ensure that each of us can contribute, advance and thrive as we harness the power of our differences. DLL embraces the principles of inclusion and non-discrimination for all people, including our customers and partners.

Your role as a member

Therefore, we want you to contribute to creating a work environment which is free from any form of disrespectful behavior, discrimination, bullying and harassment, whether physical, mental or sexual. No discrimination based on age, race, religion, nationality, ethnicity, origin, gender, sexual orientation or physical abilities will be tolerated.

Do's

- Always be respectful of diversity and welcome it as a value.
- Start an open dialogue with mutual respect, speak up together.

Do you abide by these standards? Ask yourself

- Am I treating everyone with respect and fairness?
- Am I contributing to an inclusive environment?
- Am I aware of my biases and do I work to overcome them?
- Am I supporting open dialogue and continuous learning on DE&I?
- Am I aware of the impact of my behavior on others?

For more information, please consult the **Global Policy against Harassment and Discrimination** and the **Global Policy on Hiring.**

3 Brand and reputation and social media

We safeguard our brand and reputation. DLL is a financial institution in the Netherlands that is 100% owned by Rabobank. Which means that DLL members have a responsibility in safeguarding the reputation of both DLL and our shareholder.

Brand reputation

There are many levels at which members contribute to maintaining our reputation. For instance, by keeping accurate books, avoiding conflicts of interest, protecting DLL's assets and access to DLL property and systems, and ensuring that we employ suitable people for relevant positions. The DLL Compliance frameworks contribute to the DLL global strategy by safeguarding and protecting our brand, reputation and integrity.

Your role as a member

Looking specifically at the DLL brand, we expect you to maintain consistency and coherence in the usage and application of our brand, which is crucial for safeguarding our reputation. It ensures that our message is clear, recognizable and trusted by our audiences.

Social media

We use digital channels as a platform to express DLL's identity in a responsible way. When engaging on social media, it is essential for all members to act in a manner that reflects our core values and maintains a high level of professionalism. Remember that your actions and words on social media, whether directly or indirectly, represent our brand.

Your role as a member

All members are brand ambassadors, and it is your responsibility to uphold our reputation by adhering to our guidelines and promoting a positive image of our organization. Using DLL devices for posting personal messages on social media could be seen as misuse of DLL assets. Any personal messages or content posted should not be done on DLL time as this could be seen as an outside business interest, especially if you are selling services or are a social media influencer in your spare time.

Do's

- Protect DLL's reputation when publishing/posting on your personal social media account platform messages or content that identify you as a member of DLL.
- When posting content or messages that identify you as a member of DLL, always consult the Global Procedure Social Media and Web Content Governance and the Global Procedure on External Speaking - Publishing.

Do you abide by these standards? Ask yourself

- Am I conscious that when posting messages or content that identify me as a DLL member on my personal social media account platform, that activity is fully governed by the DLL Code of Conduct?
- Is my content respectful, honest and transparent?
- Does my social media activity uphold DLL's brand and reputation?

For more information, please consult the **Global Policy on Social Media**, the **Acceptable Use of DLL IT Resources Policy** and the **Global Procedure on External Speaking - Publishing** and consult the **DLL Brand Hub** for guidance.

4 Business integrity

To the best of their abilities, members must weigh the legitimate medium and long term objectives and risks of all relevant stakeholders, including society, and refrain from any conduct detrimental to the integrity of the financial markets.

We treat our customers fairly

One of DLL values is “We put our customers first.” This means the interests of our customers are central to everything we do. The key principles of treating customers fairly, also apply to our partners.

Your role as a member

DLL expects our members to treat customers fairly by:

- Acting ethically, and establishing a culture and behavior of openness, transparency and fairness throughout the business.
- Delivering products and services which are cost-efficient, useful, safe and understandable.
- Providing information for customers which is easily accessible, clear, balanced and proportionate.
- Providing services which are focused on customer needs with sufficient controls to ensure accessibility and adequate care for all customer segments.
- Handling complaints effectively, fairly and independently.

Do's

- Register and follow up on complaints in a timely way.
- Assess root causes and lessons learned and identify improvements needed.

Do you abide by these standards? Ask yourself

- Do I provide information to customers that is easily accessible, clear, balanced and proportionate?
- Am I ensuring that our products meet the needs of the target group?
- Do I actively avoid conflicts of interest in my business dealings or disclose, manage and mitigate them to ensure that customers’ interests are central in everything we do?

For more information, please consult the **Global Policy on Conduct Compliance,** the **Global Standard on Treating Customers Fairly** and the **Global Standard on Complaints Handling.**

Fair and honest competition

At DLL we are dedicated to fair and honest competition. We believe in competition based on integrity, product quality, price and service for our customers and partners. Every member at DLL plays a crucial role in upholding our commitment to fair competition.

Your role as a member

- You do not engage in conduct prohibited by anti-trust and competition laws.
- You avoid engaging in anti-competitive behavior, such as price fixing, bid rigging, or exchanging sensitive information with competitors.

Do's

- Be aware that you should not discuss or disclose to competitors the prices/rates we charge, or our business strategies.
- Be aware that you should avoid contacting or having meetings with competitors unless you have a legitimate reason.
- Be aware you should not engage in agreements, understanding, or plans with competitors.

Do you abide by these standards? Ask yourself

Am I aware of proposals for agreements which reduce honest and fair competition?

For more information, please consult the **Global Policy on Conduct Compliance,** the **Global Standard on Fair Competition,** the **Fair Competition: Industry/Trade Associations Guidance note,** the **Fair Competition: Talent Acquisition and Retention Guidance Note,** and the **Fair Competition: Competitive Intelligence Gathering Guidance Note.**

Market abuse – inside information

DLL supports the importance of upholding the integrity, fairness and efficiency of financial markets and therefore has a Market Abuse control framework in place.

Inside information detection

Through your work at DLL or outside DLL, you may from time to time become aware of non-public, inside information about a listed company.

Your role as a member

- You use inside information only for the specific purpose or transaction that was provided for and only on a strict need-to-know basis.
- You have an obligation to ensure that you and your affiliated people, such as family members and friends, do not trade on such information, provide ("tip") or allow access to such information to others who might trade.
- You must treat inside information as confidential information, always. Unlawful disclosure of inside information is prohibited.

Do's

Avoid performing any transaction on shares or financial instruments issued by the entities whose inside information you have access to.

Do you abide by these standards? Ask yourself

- Is the inside information about financial instruments / securities (e.g. shares, bonds, options)?
- Has the information been made public?
- Is the information precise?
- Would this information, if released, significantly impact on the related share price?
- Would a reasonable investor use it as part of their investment decisions?

For more information, please consult the **Global Policy on Conduct Compliance,** the **Global Standard on Market Abuse** and the **Global Procedure on Insider Designation and Wall-Crossing.**

Conflicts of interest

Conflicts of interest may take the form of outside business activities, personal / professional relationships with customers and partners, close personal relationships with other DLL members, alternative investments or the exchange of gifts, hospitality and entertainment (GH&E).

When conducting business activities, we want to act in accordance with the best interests of our customers, partners and third-party providers.

Your role as a member

To uphold this commitment, we expect all members to do everything possible to prevent, manage and mitigate conflicts of interest in all their forms.

Do's

- Discuss with your manager any potential conflict of interest with people or parties inside or outside of DLL.
- Register any conflict of interest in the GATE portal.
- If you are considering an outside business activity, discuss it first with your manager to get up-front permission.
- Prevent situations where you may have work related influence over a family member or a romantic/intimate partner.

Do you abide by these standards? Ask yourself

- Have I agreed with my manager which mitigations to adopt to avoid conflicts of interest that could affect my business decisions, and have I registered this in GATE?
- Have I informed my manager in a timely manner in advance of a possible conflict of interest arising from my personal relationship with a colleague?

For more information, please consult the **Global Policy on Conduct Compliance,** the **Global Standard on Conflicts of Interest,** and the **Close Personal Relationships at Work Guidance Note.**

Anti-bribery and corruption

DLL is committed to fighting bribery and corruption. Bribery and corruption involve offering or receiving benefits to encourage dishonest or illegal actions, or to misuse power for personal gain.

We prohibit bribery and corruption in all forms and types in all locations where we operate. We carry out anti-corruption assessments of our customers, partners, third-party providers and government officials during any business engagement, during the onboarding process and periodically thereafter.

Your role as a member

We expect you to act with the highest standards of integrity in our business dealings with these parties and to prevent involvement in bribery or corruption.

Do's

- Register any gifts, hospitality and entertainment in the GATE portal and ask for management approval.
- Assess the customer's, partner's and third-party's corruption risk during onboarding and during their relationship with DLL.

Do you abide by these standards? Ask yourself

Am I consulting my manager or Local Compliance Officer if I have doubts about the corruption risk assessment?

For more information, please consult the **Global Standard on Anti-Bribery and Corruption.**

Business gifts, hospitality and entertainment

We want to do business in an ethical, transparent and lawful way. Giving or receiving gifts, hospitality, or entertainment (GH&E) that improperly influences business decisions, or creates the appearance of doing so, is prohibited.

Your role as a member

- We expect you to exchange gifts, hospitality and entertainment in a responsible, transparent, appropriate, reasonable, and measured manner to support business-relationship building or maintenance.
- All business gifts, hospitality and entertainment courtesy you exchange should be offered voluntarily, openly and without solicitation or expectation of something in return.
- This is done in strict accordance with our applicable policies to avoid any potential conflicts of interest or the perception of bribery or corruption.

Do's

- Consult the Global Procedure on Gifts, Hospitality & Entertainment (GH&E) for more information and before giving or receiving.
- Consult in advance with the counterparty on the appropriateness of giving gifts.

Do you abide by these standards? Ask yourself

- When considering giving or receiving a gift, a meal or an invitation to an event, do I think about whether it could be seen as improper or an attempt to influence a business decision?
- Is it in line with our policy? Have all necessary reporting and approval processes been followed?
- Could my giving or receiving of gifts, hospitality or entertainment improperly influence business decisions?

For more information, please consult the **Global Procedure on Gifts, Hospitality & Entertainment (GH&E)** and the **Gifts, Hospitality and Entertainment Guidance Note.**

Dealing with government officials

Government officials or public officials are often prohibited by law from giving or receiving anything of value to influence official actions (also sometimes known as *facilitation payment*) or securing an improper advantage. Several laws around the world, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, specifically prohibit offering or giving anything of value to government officials to influence official action or to secure an improper advantage.

Your role as a member

- When interacting with *government officials* or *public officials,* or *Politically Exposed Persons*, including their *close family members*, you should be especially careful. Government officials include any government employee, candidate for public office, or employee of government owned or controlled companies, public international organizations, or political parties.
- Gifts, Hospitality & Entertainment can only be offered or accepted in exceptional cases, and only after approval by your manager and after consultation with Compliance, in line with laws and regulations.

For more information, please consult the **Global Standard on Conflicts of Interest** and the **Global Standard on Anti-Bribery and Corruption.**

Bookkeeping

Compliance with all accounting and reporting requirements is mandatory at DLL.

Your role as a member

We expect members to always cooperate with auditors. False or misleading reports are not tolerated at DLL. Any amendments to the company records must be authorized by the manager. The destruction of company records shall be conducted in accordance with our records management policies and must be also authorized. No DLL assets can be sold, transferred or disposed of without proper documentation and authorization.

Do's

Comply with all accounting and reporting requirements at DLL.

Do you abide by these standards? Ask yourself

Before selling an asset which is leased or rented to a customer, did I check if the proper documentation exists?

For more information, please consult the **Global Standard on Account Reconciliations,** the **DLL Group Global Standard on Electronic Audit Evidence and End-User Computing.**

Data Storage

We apply records management principles in our efforts to work toward labeling all our records and not storing them any longer than is allowed. It is important that we keep records for an appropriate length of time.

Your role as a member

Always follow the Record Retention Schedule that applies to our locations and projects. In addition, if asked by Legal to retain records relevant to litigation, audit or investigation, do so until Legal tells you retention is no longer necessary.

Do's

Always reach out to your manager and/or your Privacy Coordinator if you don’t know what the exact retention period of a record or a document is.

Do you abide by these standards? Ask yourself

Am I up to date on how long records can be stored?

For more information, please consult the **Global Policy on Records Management.**

5
Customer, partner and third-party integrity

Sanctions, export and import regulations

At DLL, we support compliance with all applicable sanctions, export and import and anti-boycott laws. In addition, we aim to ensure that our third-party providers comply with these regulations. DLL is fully committed to United Nations, European Union, Dutch and other relevant sanctions regulations such as those in the United States of America and United Kingdom.

You should be aware that when moving across national borders, DLL assets are subject to various export and import regulations. These regulations may prohibit import, export and re-export of DLL assets to certain countries or even to certain individuals. Export is not only limited to goods physically crossing borders, it also includes software downloads or services provided from one country to another.

An example of these regulations includes U.S. and international trade laws that control where DLL can send or receive its products and/or services.

These laws are complex, and apply to (for example):

- Imports and exports from or into the U.S.
- Imports and exports of products from or into other countries, with additional concerns when those products contain components or technology of U.S. origin.
- Exports of services or providing services to non-U.S. persons.
- Exports of technical data, especially when the technical data is of U.S. origin.

Among other controls, sanctions screening is mandatory for DLL members, customers, partners and third-party providers. This is also applicable to occasional transactions, or in case of involvement with other services and transactions with counterparties.

Your role as a member

We expect our members to recognize that export and import regulations can be complex. Always check which (sanctions) restrictions apply to your transaction.

Do's

- Understand the requirements that apply to your role and/or transaction.
- Screen before acting.
- Seek guidance in the Global Standard on Sanctions and the Global Procedure on Name Screening.
- Consult when in doubt – contact your Compliance Officer or Group Financial Crime Compliance when you are unsure.

Do you abide by these standards? Ask yourself

- Am I understanding the requirements relevant to my role or transaction?
- Have the required parties been screened in accordance with DLL's requirements?
- Am I aware of the applicable restrictions in case of export/import?
- Have I checked DLL's Global Standard and Global Procedure, or consulted the local Compliance Officer or Group Financial Crime Compliance when unsure?

For more information, please consult the **Global Standard on Sanctions** and the **Global Procedure on Name Screening.**

Due diligence

As a financial institution, we conduct business with integrity and participate in international efforts to combat financial economic crime (FEC).

To this end, we perform due diligence on customers, partners and third-party providers. DLL also monitors transactions to detect and prevent any involvement in criminal activities. Compliance with regulations on Anti-Money Laundering, Counter-Terrorist Financing and Sanctions is a priority.

Your role as a member

We expect you to know your customer – ensure that DLL has all the required information for proper identification and mitigation of FEC.

Do's

- Know the rules – understand the requirements that apply to your role and/or your transaction.
- When you have any FEC-related questions, doubts or concerns, contact either Compliance (for further reference to the designated Money Laundering Reporting Officer within your business unit, Group Financial Crime Compliance), your manager or team leader.

Do you abide by these standards? Ask yourself

- Do I have sufficient reliable information about the customer or partner and their relationship with DLL?
- Are the activities performed by the customer or partner consistent with expectations?
- Is the customer seeking to obtain equipment for which they have a legitimate need?
- In any case of suspicion do I ask questions until I believe I understand the situation?
- Did I document how the issue was resolved?
- Do I escalate the issue to my manager or to my Compliance Officer if the issue is not resolved?

For more information, please consult the **Global Financial Crime Compliance Policy,** the **Global Policy on Transaction Monitoring** and the **Global Standard on AML/CTF** and underlying procedures.

Fraud

At DLL, we provide services in relation to a wide variety of products in the global marketplace. This makes us a potential target for external and internal fraud. Fraud can occur in various contexts, including financial transactions, business dealings and personal interactions. We place strong emphasis on preventing and mitigating fraud to the greatest extent possible. Our aim is to prevent any involvement in criminal activities, and to limit financial losses and reputational damage.

Your role as a member

All DLL members are responsible for being vigilant and for maintaining integrity to continue to do the right thing every day for DLL, our members, our customers and our partners.

Do's

- Stay alert for signs of fraud (red flags), such as unusual customer or partner behavior, inconsistencies in documentation or in asset details.
- Always validate customer and partner information, including financial statements and asset details.
- If you suspect fraud or notice something unusual, report it to your manager, the Fraud Coordinator or your local Compliance Officer.
- Pause and look for necessary guidance if something doesn't feel right (e.g. a rushed deal, a customer opposed to providing documentation, a mismatch between asset and business).

Do you abide by these standards? Ask yourself

- Am I confident the leased equipment is related to the lessee's core business activities?
- Have there been any sudden or unusual changes in the lessee's business operation or a shift to an entirely different business sector?
- Are there difficulties in gaining physical access to the assets listed in the lease agreement?

For more information, please consult the **Global Standard on External Fraud,** and the **Global Standard on Internal Fraud.**

Tax integrity

DLL always needs to act in compliance with the letter and intention of prevailing tax rules and regulations. We contribute fairly and correctly to the global tax base.

Your role as a member

The following principles give you guidelines to consider when assessing tax integrity:

- Business purpose: All transactions must have a clear and unambiguous business purpose and not be a tax avoidance mechanism.
- Reputation: Due consideration should be given to DLL's reputation, including tax ethics of customers, partners and third parties that DLL does business with.
- Compliance: DLL strives to act in compliance with the applicable tax rules, tax regulations and other relevant legal requirements.
- Transparency: DLL is transparent toward tax authorities.
- Disclosure: DLL does not publicly disclose any tax rulings, transfer pricing arrangements or tax disputes, unless there is a legal obligation.
- Documentation: All tax-related decisions are properly documented.

Do's

- Maintain a high ethical standard in DLL's approach to tax and tax authorities.
- Protect DLL's reputation in relation to taxes and to managing tax risk within DLL's tax risk appetite.
- If in doubt, consult and get aligned with your Tax Officer.

Do you abide by these standards? Ask yourself

Am I aware when I must consult my Tax Officer at local or global level?

For more information, please consult the **Global Tax Policy** and the **Global Transfer Pricing Policy.**

6
Environmental, social and governance (ESG) factors

Sustainability

Sustainability is a key element in DLL's strategy. We strive to foster responsible growth, to deliver exceptional customer value, and to maintain high ethical standards, recognizing that financial performance must go hand in hand with environmental and social responsibility.

As a global financial services provider, DLL acknowledges its role in contributing to a more equitable and sustainable future. We collaborate across teams to integrate the balance of risk, reward, and sustainability throughout the customer journey, making sure our impact is factored into decision-making processes.

Your role as a member

- Every DLL member is expected to integrate sustainability into daily work, by managing ESG risks, promoting positive impact, and applying sustainable practices. Engaging in conversations about sustainability with colleagues and stakeholders helps us grow and improve together.
- You are expected to avoid greenwashing by ensuring sustainability claims are clear, fair, and not misleading.
- In everything you do, you are expected to respect human rights, animal welfare, and the environment by practicing sustainable habits and promoting transparency.

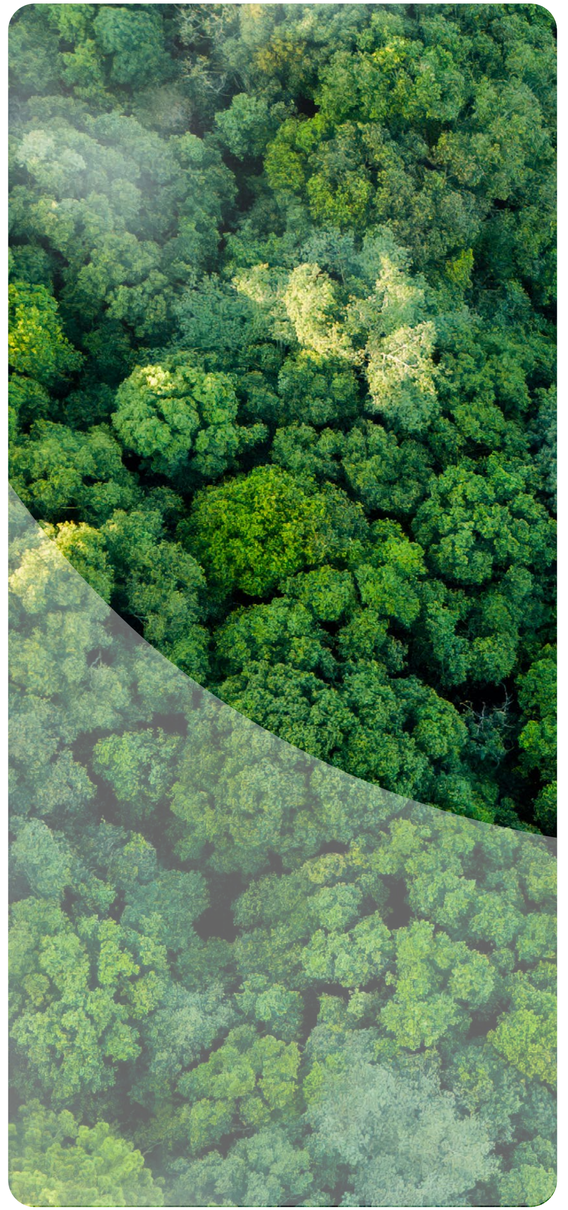
Do's

- Consider how environmental, social, and governance factors affect DLL, and how our actions impact society and the planet.
- Where appropriate, support our partners and customers in their sustainability journey.
- Use volunteer days for local causes.

Do you abide by these standards? Ask yourself

- Do I consider how my interactions with partners, customers, and third parties align with DLL's sustainability values?
- Do I explore opportunities with our partners and customers to support their ESG goals?
- When unsure about sustainability, do I seek guidance from Group Sustainability to improve my understanding?
- Do I actively engage in conversations about sustainability to learn and improve?

For more information or guidance, please consult the **Global Standard on Environmental, Social & Governance (ESG) Risk Management** and the **Global Standard on Anti-Greenwashing.**



7 Security, confidential information and privacy

Security

Security works toward maintaining availability, integrity and confidentiality of data and every member is responsible for upholding these principles. We strive to be resilient against cyber-attacks by building a robust foundation and fostering a secure culture.

Information security

We work toward protecting information from any inappropriate use or disclosure that could potentially harm DLL, its members, customers or partners.

Your role as a member

- We expect you to use all confidential information with care, only for the specific purpose or transaction that was provided and, on a need-to-know basis. This extends to sharing confidential information from internal or external sources which should not be shared without explicit authorization.
- You should always maintain confidentiality in accordance with your employment contract and the non-disclosure agreement during and after your employment at DLL.

Physical security

DLL provides you with the tools and equipment needed to do your job effectively and counts on you to use the equipment responsibly and for the purpose for which it was provided. Physical security represents one of the critical security layers for the protection of organizational assets.

Your role as a member

Always secure your badge, laptop, USB sticks, printed information, important equipment and your personal belongings, even while on DLL's premises. Do not tamper with or disable security and safety devices.

Do's

- Protect the information and the physical means for accessing the DLL IT resources (including IDs, passwords, security tokens, pass codes and building-access key cards).
- Report to the Service Desk if you think our data or IT resources are at risk (including lost IT devices) or suspect something suspicious.

Do you abide by these standards? Ask yourself

Am I handling DLL IT resources in a way that ensures the availability of our services, the integrity and the confidentiality of our data?

For more information, please consult the **Acceptable Use of DLL IT Resources Policy.**

Respect for proprietary information

Intellectual propriety rights (our trademarks, logos, copyrights, trade secrets, know-how, and patents), which are among our most valuable assets, must be respected. This applies also to copyrights, trademarks and brands of other parties such as our customers, partners and third-party providers.

Your role as a member

- You are expected to maintain confidentiality during and after your employment period at DLL.
- We expect our members not to use information from previous employers at DLL (e.g. copyright information, or breach of non-disclosure agreement) and to respect the intellectual propriety rights of DLL.

Do

Protect access to information and systems.

Do you abide by these standards? Ask yourself

- Am I using only approved standard documents from official company repositories?
- Am I processing DLL business information only on a need-to-know-principle basis?

For more information, please consult the **Information Security Statement of Applicability,** the **Global Policy on Trademarks,** and the **Global Procedure on Non-Disclosure Agreements.**

Privacy

At DLL we process personal data. Personal data is any information related to identified or identifiable natural persons, such as members, customers, partners, suppliers, or users of financed assets. The data remains property of these individuals.

That's why we strive to respect the privacy of individuals whose personal data we process. We protect it to the best of our ability and always in accordance with our Global Privacy framework and Information Security Policy, Standards and Procedures.

Your role as a member

We expect you to apply these principles in everything you do.

Do's

- Report a privacy incident, such as unauthorized access, on the IT Portal without undue delay (within hours). For example, an email with personal data sent to the wrong recipient.
- Minimize personal data. When processing (e.g. collecting, using, storing, or sharing) personal data, only select the minimum set of data necessary.
- Be transparent to individuals about the personal data we collect about them. For example, in our privacy statements we explain how personal data is collected and processed.
- Only process the data for a lawful business purpose. If the personal data is planned to be processed for other purposes, connect with your Privacy Coordinator.
- Ensure fairness and only process personal data in ways that the individuals would reasonably expect and not use it in ways that have undue consequences on them. For example, discrimination and exclusion.
- Keep personal data accurate and, where necessary, up to date.
- Keep personal data no longer than is necessary for the purposes for which it was collected, unless we must comply with a legal obligation to retain it longer.
- Keep personal data confidential and secure. Only share, or provide access to it on a need to know basis.
- Conduct a privacy assessment in the early stages of developing new business processes or IT solutions.
- Know the privacy rules that apply to your role, and seek advice from your Privacy Coordinator in case of questions.

Do you abide by these standards? Ask yourself

- Am I reporting privacy incidents promptly?
- Do I act responsibly when collecting personal data, using and accessing only the minimum set of personal data which is necessary to meet the specified business purpose?
- Is privacy and security a fundamental element of everything we design and build?

For more information, please consult the **Global Privacy Policy,** the **Rabobank Group Privacy Code,** the **Global Policy on Records Management,** the **Global Privacy Standard on Transparency,** the **Global Privacy Standard on Individual Rights,** the **Global Privacy Standard on Personal Data Breach Management,** the **Global Standard on Privacy by Design.**

8 Contribute to a safe working environment

Call out misconduct

DLL strives to create an environment based on trust, respect and dignity, in which you feel empowered.

At DLL, we do not tolerate illegal, inappropriate and undesired behavior, such as sexual harassment, aggression and violence, bullying and discrimination.

It is important that you always feel safe and respected at work.

Your role as a member

- If you encounter misconduct or inappropriate behavior – directed against yourself or another member – please call it out. DLL encourages members to first resolve complaints or issues bilaterally with the people involved, and/or the members' line managers.
- If this direct approach does not bring resolution, if it is not feasible, or you feel uncomfortable, there are several channels and tools available for you to speak up. We assure you that your report will be treated with the highest confidentiality. If you make a report in good faith, or participate in an investigation, you are protected from retaliation, and the investigation will be undertaken under strict rules of confidentiality. If you do not make a report in good faith, this may result in disciplinary actions.
- If you are the subject of a report, your confidentiality will also be equally protected. If involved in an investigation or the subject of a report, you must not seek to quiz anyone involved in a report or investigation. Anyone breaching confidentiality or retaliating or threatening those involved will face disciplinary action.
- DLL has a right to monitor and record the use of its property, systems and facilities. That may also include private communications. We will only investigate behavior when there is a reasonable suspicion that it might endanger DLL's reputation, member safety or assets, or might break the law, this Code or other policies.

Speak Up channels and tools

- Feel free to talk to your manager, HR Business Partner, your Compliance Officer or a member from the Legal department.
- You can contact one of the members of the Speak Up Committee.
- Trusted Person Network: Contact a Local Trusted Person via telephone or email which are accessible via the Trusted Person Network.
- Speak Up Point: You can choose to report via telephone or websites which are accessible in all DLL countries via the Speak Up Point.

See MyDLL for more information about Speak Up.
More information can be found in the Speak Up Policy and the Misconduct Investigations Procedure.

Do's

- Address misconduct. You have a responsibility to do so!
- Feel free to start the dialogue directly with colleagues and management.
- Report misconduct to HR, Compliance or Legal colleagues or via one of the Speak Up channels and tools.
- Treat any report as strictly confidential.
- Cooperate in any misconduct investigation as soon as requested and always keep details of the investigation confidential.
- Speak up if you feel you are being retaliated against.

Do you abide by these standards? Ask yourself

- Is the behavior I observe or experience respectful and professional?
- How does this behavior affect others or me?
- Does this behavior violate the Code of Conduct, company policies or legal standards?
- What steps can I take to address this behavior?

Failure to follow the Code of Conduct

Any action in conflict with the Code of Conduct could jeopardize our business relations or reputation and will be considered a significant violation. When questions arise around a failure to work within the boundaries of the Code, any investigations or decisions on staff disciplinary matters will be governed by our strong principles on ethics and integrity. DLL will treat failure to follow the Code very seriously, and it may lead to disciplinary action which could result in dismissal. This process may involve competent authorities if you have broken any laws or regulations, for example the police if you have committed a criminal offense.

Note: DLL may use external third parties for investigatory purposes.

For more information, please consult the **DLL Global Speak Up Policy,** the **Global Procedure on Misconduct Investigations,** the **DLL Global Standard on Disciplinary Actions,** the **Global Standard on Internal Fraud,** and the **Speak Up Reporting Guidance Note.**

Colophon

Owner: Group Compliance

Effective date: October 2025

Next review date: October 2027