

# Code of Conduct

2026

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## 1. Introduction

At DVJ Insights we believe that how we work is just as important as the work we do. As a research and insights company, our role is to help organisations make better decisions based upon research. Clients trust us with sensitive information, research participants trust us with their opinions and data, and our employees trust us to provide a safe and inspiring place to work. That trust is the foundation of our company and something we take very seriously.

This Code of Conduct describes the principles that guide how we work at DVJ Insights. It sets out the standards we expect from ourselves in our daily work with colleagues, clients, research participants, suppliers and the wider community.

From the start of the company, we have believed that a successful business should also contribute positively to society. Over the years this has become an integral part of how DVJ operates. Our approach to responsible business is structured around internationally recognised frameworks such as ISO 26000 for social responsibility, the ESOMAR guidelines for market research, and the legal and regulatory frameworks that apply in the countries where we operate.

At the same time, responsible behaviour at DVJ is not only about formal standards or policies. It is about the culture of the organisation and the way people treat each other and the people we work with. We expect everyone working at DVJ to act with integrity, openness and respect.

This Code of Conduct therefore serves two purposes. It explains the principles that guide our decisions and behaviour, and it helps ensure that these principles are applied consistently across all DVJ offices.

## 2. Scope and applicability

This Code of Conduct applies to everyone working for or representing DVJ Insights. This includes: all employees, management and directors, interns and trainees, temporary staff and contractors working on behalf of DVJ Insights

The Code applies to all DVJ Insights offices and affiliated entities operating in Europe, including offices in: The Netherlands, The United Kingdom, Germany, Denmark, Sweden, Spain and Norway and all future offices.

While the legal entities in these countries may operate independently, they share the same values and principles described in this Code of Conduct. Management within each DVJ office is responsible for ensuring that the principles in this Code are understood and applied in daily work.

We also expect our business partners, suppliers and external collaborators to respect similar ethical standards. Where relevant, DVJ Insights may ask suppliers and partners to follow these principles or comparable standards in their own operations.

This Code provides a shared framework that helps ensure that DVJ Insights operates consistently and responsibly across all locations.

## 3. Compliance with (international) laws and standards

DVJ Insights operates in several countries and therefore complies with the laws and regulations that apply in the jurisdictions in which we work. This includes legislation related to employment, data protection, research practices, competition law and business conduct.

Beyond legal compliance, DVJ Insights believes that responsible business conduct also requires alignment with internationally recognised standards. These frameworks provide guidance on how organisations can operate ethically, transparently and responsibly.

Our approach to responsible business is informed by, among others:

- OECD Guidelines for Multinational Enterprises, which provide principles for responsible business conduct
- UN Global Compact principles, covering human rights, labour standards, environmental responsibility and anti-corruption
- ILO Core Labour Standards, which protect fundamental rights at work
- ISO 26000, which provides guidance on social responsibility and stakeholder engagement
- ESOMAR guidelines, which define ethical standards for market research and data collection
- ISO 27001, which governs information security management
- ISO 20252, which provides quality standards for market research
- Applicable data protection regulations, including the General Data Protection Regulation (GDPR)

These frameworks guide how we design our policies, how we work with clients and research participants, and how we manage our responsibilities as an employer and business partner.

Where local legislation and the principles described in this Code differ, DVJ Insights will apply the stricter requirement.

DVJ Insights B.V. is committed to conducting business with integrity, transparency, and respect for people, society, and the environment. As an international research and analytics organization, we recognize that our work influences decision-making by companies, institutions, and policymakers. This responsibility requires us to operate according to the highest ethical and professional standards.

## 4. Governance and accountability

At DVJ Insights, responsible business conduct is part of our day-to-day decision-making and leadership. That is why the board is responsible for ensuring that the principles set out in this Code of Conduct are embedded in the way we work and develop as an organisation. All managers are informed and we expect from managers to:

- lead by example in their behaviour and decision-making
- ensure that team members understand and apply this Code
- create an environment where people feel comfortable speaking up
- address issues or concerns when they arise

All employees are responsible for applying the principles in this Code in their daily work. This includes making decisions that are consistent with our values, even when situations are not explicitly covered by formal rules. To support this, DVJ Insights ensures that:

- this Code of Conduct is shared with all employees
- new employees are introduced to these principles during onboarding
- relevant policies and guidelines are accessible within the organisation

Responsible business practices are also considered in how we work with clients and suppliers. Where relevant, DVJ integrates these principles into its business processes, including project execution and partner selection. Our suppliers are informed by our code of conduct, and we also

informed our partners that the relation can be terminated if they do not apply the same principles of responsible business.

DVJ Insights does not expect perfection, but it does expect awareness and willingness to act responsibly. When issues arise, they are addressed in a constructive and transparent way, with a focus on learning and improvement.

## 5. Human Rights

Respect for people is a basic condition for doing business. This applies to our own organisation, but also to how we work with clients, partners and research participants. One of our core values for that reason is positivity and that starts with respect. We are also committed to respecting internationally recognised human rights and to treating everyone with dignity and fairness. Within our own organisation, this means that we:

- provide a safe and respectful working environment
- promote equal opportunities and fair treatment
- do not tolerate any form of discrimination, harassment or intimidation
- respect personal freedom, privacy and individual differences

We expect everyone at DVJ to contribute to a working environment where people feel comfortable, respected and able to be themselves.

We also take responsibility in how we conduct our work. As a research company, we interact directly with people and handle personal data. This means we are careful to:

- respect the rights and privacy of research participants
- ensure participation is voluntary and transparent
- handle data in a responsible and secure way

Beyond our own organisation, we expect the same basic principles to be respected by the partners and suppliers we work with. Where relevant, we take these considerations into account when selecting and working with external parties.

We recognise that human rights is not a static topic. As we grow and operate across multiple countries, we remain attentive to differences in local contexts and continue to improve how we identify and address potential risks. Our global headquarters brings together people from many different nationalities and backgrounds. We see this diversity as a strength and actively aim to create an environment where everyone feels respected and included.

## 6. Labour standards and working conditions

DVJ Insights aims to provide a working environment where people can perform at their best and feel supported in their professional and personal development. We believe that good working conditions are essential for both individual wellbeing and the quality of our work. Within DVJ Insights, this means that we:

- provide clear and fair employment terms
- comply with applicable labour laws and regulations
- ensure reasonable working hours and respect for work-life balance
- offer a safe and healthy working environment
- invest in learning and development opportunities
- encourage open communication between employees and management

We actively monitor employee experience and wellbeing via our daily happy meter, and we use this feedback to continuously improve how we work as an organisation. DVJ Insights does not tolerate:

- unsafe working conditions
- excessive working hours
- unfair treatment or exploitation
- any form of intimidation or inappropriate behaviour

We also recognise that a positive working environment is not only created through policies, but through daily behaviour. Managers play an important role in setting the tone, supporting their teams and addressing issues when they arise. As an international organisation, we respect local labour practices while maintaining a consistent standard across all offices.

Where relevant, we expect similar standards to be applied by partners and suppliers working with DVJ Insights.

## 7. Diversity, equality and inclusion

At DVJ Insights, we see diversity as a natural part of who we are as an organisation. Our teams bring together people from different nationalities, backgrounds and perspectives. This diversity is not something we manage as a separate initiative, but something that is embedded in how we work together every day. We believe that different perspectives lead to better thinking, better research and ultimately better decisions for our clients.

We are committed to providing an inclusive working environment where:

- everyone is treated with respect
- people feel comfortable being themselves
- differences in background, experience and perspective are valued
- opportunities are based on talent and contribution

DVJ Insights does not tolerate discrimination of any kind, including based on gender, nationality, ethnicity, religion, age, disability or sexual orientation. As an international organisation, we are used to working across cultures and contexts. This requires openness, curiosity and mutual respect in how we collaborate.

We recognise that inclusion is not only about policies, but about daily behaviour. We therefore encourage:

- open communication
- constructive feedback described as feedforward
- awareness of different perspectives
- respectful collaboration across teams and locations

We continue to learn and improve how we create an inclusive environment, both through internal dialogue and through the way we organise our work.

## 8. Health, safety and well being

At DVJ Insights, we believe that people perform best when they feel well, both physically and mentally. Creating a healthy and safe working environment is therefore a core part of how we

operate. This goes beyond basic workplace safety and includes overall wellbeing, energy, and balance. We are committed to providing a working environment where:

- employees feel safe and supported
- physical and mental health are taken seriously
- there is room for recovery and work-life balance
- people feel comfortable raising concerns

We comply with applicable health and safety regulations in all countries where we operate. At the same time, we recognise that wellbeing is not only about compliance, but also about how work is organised and experienced.

Within DVJ Insights, we support wellbeing through:

- a flexible and hybrid way of working
- attention to workload and work-life balance
- open communication between employees and management
- access to confidential advisors when needed
- ongoing attention to both mental and physical health

We also actively encourage a healthy and active lifestyle. For example:

- we contribute to sports and fitness activities
- we aim to create inspiring working environments, including office locations with natural light and a pleasant atmosphere
- employees are given time off to celebrate personal moments, such as their birthday
- We have “powder days”, where employees are encouraged to take time off when conditions allow them to pursue activities they are passionate about

We actively monitor employee wellbeing and engagement through a daily internal feedback system (the happy meter) and dialogue by having a leadership infrastructure where every person in the company can get the attention that is needed. The insights from this are used to improve how we work as an organisation.

Managers play an important role in this. They are expected to:

- be attentive to the wellbeing of their teams
- recognise early signs of stress or overload
- create a safe environment where concerns can be discussed

We believe that a healthy organisation is built on trust, openness and continuous attention to how people experience their work.

## 9. Ethics and business integrity

At DVJ Insights, we believe that trust is the foundation of our work. Our clients rely on us for independent, objective and reliable insights, and we take that responsibility seriously. We are committed to conducting business with integrity, transparency and professionalism in all our activities.

This means that we:

- act honestly and openly in our work
- ensure the independence and objectivity of our research

- avoid conflicts of interest
- protect confidential information
- make decisions based on what is right, not what is easy

We do not tolerate:

- bribery or corruption
- manipulation of research outcomes
- misleading information
- any form of unethical business behaviour

Our work as a research and insights company requires a high level of professional integrity. We therefore ensure that:

- research is conducted according to recognised industry standards
- results are reported accurately and without bias
- clients are advised based on honest and evidence-based insights

We believe that strong and sustainable relationships are built on mutual respect. We expect our clients and partners to treat our people with the same professionalism and respect that we bring to our work. In situations where this is not the case, we address this openly and constructively. If needed, we are prepared to reconsider or discontinue collaborations that do not align with our values.

Employees are encouraged to speak up if they encounter situations that conflict with this Code. This is supported by our daily feedback instrument (the happy meter\_, which provides a structured and accessible way to share concerns via open feedback.

## 10. Anti-corruption and anti-bribery

DVJ Insights has a zero-tolerance approach to bribery and corruption. We believe that business should be conducted based on trust, quality of work and long-term relationships, not through improper influence or personal gain. Employees and representatives of DVJ Insights must not:

- offer, promise or give any form of bribe or improper advantage
- request or accept bribes or inappropriate benefits
- engage in any form of fraud or dishonest behaviour
- misuse their position for personal gain

This applies to all interactions with clients, suppliers, public officials and other business partners. Gifts and hospitality may only be accepted or offered if they:

- are reasonable and proportionate
- are not intended to influence business decisions
- comply with applicable laws and internal standards

Any situation that could lead to a conflict of interest must be avoided or disclosed. Employees are expected to be transparent about personal or financial interests that could influence their professional judgment.

DVJ Insights expects the same standards from the partners and suppliers we work with.

If employees are uncertain about a situation, they are expected to seek guidance or raise the issue. Concerns can be reported through management, confidential advisors or internal feedback channels.

Violations of this policy may lead to appropriate action, including disciplinary measures or termination of business relationships.

## 11. Fair competition

DVJ Insights is committed to fair, open and transparent competition. We believe that business should be won based on the quality of our work, the strength of our ideas and the trust we build with clients, not through unfair or anti-competitive practices. All employees are expected to comply with applicable competition and antitrust laws in the countries where we operate.

This means that employees must not:

- enter into agreements with competitors that restrict competition
- share or exchange confidential or commercially sensitive information with competitors
- engage in price-fixing, market allocation or bid manipulation
- misuse market position or client relationships in an unfair way

Interactions with competitors, industry peers or within professional networks must always remain appropriate and compliant with competition laws. Employees should be particularly careful in situations such as:

- industry events or conferences
- informal conversations with competitors
- collaborations or partnerships within the industry

If there is any doubt about what is appropriate, employees are expected to seek guidance before proceeding. DVJ Insights also expects its partners and suppliers to act in accordance with fair competition principles. Maintaining fair competition is essential to preserving trust in the market and ensuring a level playing field for all.

## 12. Data protection and research ethics

As a research and insights company, DVJ Insights works with data daily. This requires a high level of responsibility in how we handle information and conduct research. DVJ Insights operates in line with recognised industry standards and is formally certified where applicable. This includes:

- ISO 27001 for information security management
- ISO 20252 for market research quality standards
- Compliance with the General Data Protection Regulation (GDPR)
- Adherence to ESOMAR guidelines for ethical research

These standards are embedded in how we work and are subject to regular external audits and internal reviews to ensure ongoing compliance. To ensure consistent application across the organisation:

- employees are trained on data protection and research standards during onboarding
- awareness of these standards is reinforced through regular communication
- periodic checks and questionnaires are used to assess understanding and application

- internal procedures and guidelines are continuously updated based on learnings and developments

Employees are expected to:

- follow established data protection and security procedures
- handle data with care and confidentiality
- remain aware of risks related to data use and storage

Given the nature of our work, we also expect partners and suppliers who process data on our behalf to meet comparable standards. DVJ Insights sees data protection and research ethics not as a one-time requirement, but as an ongoing responsibility that is continuously monitored and improved. That is why the ISO standards and audits are important.

## 13. Environmental responsibility

DVJ Insights recognises that, as an organisation, we have a responsibility to minimise our environmental impact and to make conscious choices in how we operate. As a service-based research and insights company, our direct environmental footprint is relatively limited. We do not operate manufacturing processes or use heavy machinery. Our impact is primarily related to areas such as business travel, office use and digital infrastructure.

At the same time, we believe that having a smaller direct footprint does not reduce our responsibility. We therefore focus on the areas where we can make a meaningful difference and actively manage and reduce our impact where possible.

Within DVJ Insights, environmental considerations are integrated into the way we work. This includes:

- encouraging hybrid and digital ways of working to reduce travel
- being conscious about business travel and promoting more sustainable alternatives where feasible
- reducing travel-related emissions by asking people to choose for electric cars and make that more attractive
- maintaining largely paperless workflows
- making conscious choices in office locations and facilities

In addition to reducing our own footprint, we also aim to contribute to sustainability through our work. As part of our research activities, DVJ Insights has developed tools that help consumers gain insight into their environmental impact, for example by providing visibility into the CO<sub>2</sub> footprint of their grocery choices. For this we have developed a new app called Spenderlog. This app is used to collect shopper data. For the users of this app, we will give them an overview of their CO<sub>2</sub> footprint. Through initiatives like this, we aim to contribute to broader sustainability efforts and support developments such as the European Green Deal.

We recognise that environmental responsibility is an area where we can continue to develop. As such, it is part of our broader commitment to continuous improvement. Employees are encouraged to be mindful of environmental impact in their daily work and to contribute ideas that help reduce our footprint. DVJ Insights also expects its partners and suppliers to take environmental responsibility into account in their own operations.

## 14. Responsible client relationships

At DVJ Insights, we believe that strong and sustainable client relationships are built on trust, transparency and mutual respect. Our way of working is created to build partnerships. We aim to be a reliable and honest partner to our clients. This means that we:

- provide independent and objective insights
- communicate openly and transparently
- set realistic expectations about what research can and cannot deliver
- take responsibility for the quality of our work

We believe that the role of a research and insights company is not only to deliver results, but also to challenge and guide clients where needed. This includes being honest about findings, even when outcomes may not align with expectations.

At the same time, we expect our clients to treat our people with the same level of professionalism and respect that we bring to our work. We do not engage in collaborations that conflict with our core values. As part of this, DVJ Insights does not conduct research for the tobacco industry, in line with our support for a smoke-free society.

In situations where the way of working or behaviour within a collaboration does not align with our principles, we address this openly and constructively. Where necessary, we are prepared to reconsider or discontinue collaborations. We believe that working with the right partners is essential to maintaining the integrity of our work and the wellbeing of our people.

## 15. Responsible supply chains

DVJ Insights recognises that responsible business conduct extends beyond our own organisation. The partners and suppliers we work with are an important part of how we operate and deliver our services. We therefore expect our suppliers and business partners to act in a responsible, ethical and transparent manner.

To support this, DVJ Insights has established a Supplier Code of Conduct, which sets out the minimum standards we expect in areas such as:

- human rights and working conditions
- business ethics and integrity
- data protection and confidentiality
- environmental responsibility

This Code is shared with relevant suppliers and forms part of how we select and work with external partners. When selecting suppliers, we also consider these factors. We aim to work with partners who share our commitment to responsible business practices.

DVJ Insights does not operate a complex or centralised procurement structure, but we integrate these principles pragmatically into our day-to-day decision-making. Where relevant, we may:

- discuss expectations with suppliers
- request confirmation of adherence to our standards
- reconsider partnerships if fundamental principles are not respected

We also recognise that suppliers may differ in size and maturity. We therefore approach this topic in a practical and constructive way, with a focus on transparency and continuous improvement.

## 16. Community engagement

DVJ Insights believes that a company should contribute positively to society, beyond its direct business activities and be active in different organisations. As a research and insights organisation, we can share knowledge, support education and contribute to the development of our field. We see this as a natural part of our role. DVJ Insights is actively involved in society in different ways. This includes:

- collaborating with universities and academic institutions
- providing guest lectures and contributing to educational programmes
- supporting research and knowledge development within the insights industry
- contributing to projects with a social or societal impact
- sharing expertise and insights that help organisations make more informed decisions

We actively engage with the academic community. DVJ Insights has an academic advisory board, which helps us stay connected to developments and challenges within the academic world. In addition, we participate in advisory boards of universities, creating a two-way exchange of knowledge and experience.

We also take an active role in professional and societal organisations. DVJ Insights contributes to boards and initiatives within the market research and marketing industry and is involved in organisations such as SIRE. In addition, we participate in advisory initiatives focused on addressing societal challenges, including efforts to combat loneliness.

Through these roles, we aim to contribute not only to our industry, but also to broader societal topics where behavioural insights can make a meaningful difference. We believe that this interaction strengthens both academic research and practical application and contributes to continuous learning on both sides.

We believe that investing in knowledge and education benefits both society and the long-term development of our organisation. In addition, DVJ Insights supports initiatives that contribute to broader societal goals, including sustainability, public health and behavioural change. Employees are encouraged to contribute to these initiatives and to share knowledge and experience where relevant. We see community engagement not as a separate activity, but as something that is closely connected to our work and expertise.

## 17. Speak up and reporting

DVJ Insights encourages an open and transparent working environment in which employees feel comfortable speaking up. We believe that identifying and addressing concerns at an early stage is essential for maintaining trust, integrity and a healthy organisation. Employees are encouraged to raise concerns if they encounter situations that conflict with this Code of Conduct, internal policies or applicable laws and regulations.

DVJ Insights provides multiple ways for employees to raise concerns, including:

- direct communication with management
- confidential advisors within the organisation
- HR, who can provide guidance and support
- internal feedback mechanisms

Our daily feedback instrument, the happy meter, plays an important role in this. It provides an accessible and structured way for employees to share feedback, raise concerns and signal issues as part of everyday work.

In addition, the way we organise our teams supports a speak-up culture. By working in relatively small teams, employees have regular and direct contact with their manager or buddy, making it easier to raise questions, share feedback and address concerns early.

DVJ Insights has appointed confidential advisors within the organisation. These advisors provide a safe and independent point of contact for employees who wish to discuss concerns, ask for guidance or report sensitive issues. They operate with discretion and confidentiality and can support employees in exploring possible next steps.

All concerns are taken seriously and handled with appropriate care and confidentiality. Where needed, appropriate action will be taken. DVJ Insights does not tolerate any form of retaliation against employees who raise concerns in good faith. We believe that speaking up should be a normal part of how we work. Creating an environment where people feel safe to do so is a shared responsibility across the organisation.

## 18. Review and yearly updates

DVJ Insights recognises that responsible business conduct is an ongoing process that evolves over time. This Code of Conduct is therefore not a static document. It is reviewed at least annually by the Management Team to ensure that it remains aligned with:

- developments within the organisation
- changes in laws and regulations
- evolving industry standards
- feedback from employees and stakeholders

Insights from internal feedback, daily practice and discussions within teams are used to continuously improve how we work and how the principles in this Code are applied. Where relevant, updates to this Code or related policies are made to reflect new learnings, risks or opportunities.

DVJ Insights is committed to continuously strengthening its approach to ethics, sustainability and responsible business, in line with its growth and international presence.