

## Code of Conduct for Business Partners of ERBACHER the food family

regarding compliance with laws, compliance requirements, environmental and social standards.

**ERBACHER the food family** is a family business that produces and sells products for the nutrition of humans and animals. The company should serve the well-being of people. We pursue a value-orientated, credible and sustainable strategy. Our committed employees are important for the company's success.

Our responsibility for creation becomes visible through sustainable action. Our cross-border responsibility for our fellow human beings is expressed in the work of the non-profit ERBACHER Foundation. (Excerpt from the company guidelines)

The following standards have been formulated to concretise the guidelines. They apply to all companies and employees, including the management and owners of Erbacher the food family. This Code of Conduct clarifies the values of the family business ERBACHER the food family and sets out the standards of behaviour that enable our company and our employees to maintain a good reputation and the trust of shareholders, business partners and other important institutions and groups. For us as Erbacher the food family, taking responsibility and contributing to environmental and social compatibility in our business activities is a top priority. In order to ensure compliance with the above standards in accordance with the applicable supply chain compliance laws at national and EU level, we hereby also oblige all business partners, including our suppliers, service providers or other sales/cooperation partners, to follow the principles of this Code of Conduct and to oblige their own suppliers and other business partners accordingly (and thus ultimately to ensure the validity of these compliance standards throughout the entire supply chain).

For reasons of easier readability, no gender-specific differentiation, such as male or female employees, is used. Corresponding terms apply in the sense of equal treatment of all genders (m/f/d).

Scope of application: This Code of Conduct applies to all companies or economic operators with which the companies of the Erbacher the food family<sup>1</sup> group of companies enter into or maintain a business relationship.

<sup>1</sup> *Josera GmbH & Co. KG, Josera Petfood GmbH & Co. KG, Josera Polska Sp. zo.o., Josera petfood Sp. zo.o, food family Agency GmbH & Co. KG, foodforplanet GmbH & Co. KG, Josera Erbacher Service GmbH & Co. KG, Erbacher Food Intelligence GmbH & Co. KG, FarmChamps GmbH & Co. KG*

This Code of Conduct is an integral part of the business relationship between you and the companies of the Erbacher the food family group.

## **1. Compliance with laws and regulations**

Your company undertakes to comply with all applicable European and national laws and regulations, as well as all minimum industry standards. You will not gain any advantage by conducting your business in an unlawful or unethical manner.

You are committed to the principle of pursuing your business objectives by legal and ethical means in compliance with the law. We do not tolerate any form of bribery or corruption.

No unauthorised or improper personal advantages of any kind may be offered or granted, either directly or indirectly, to representatives of government agencies. When dealing with government agencies, particular care must be taken to ensure that no advantages are promised or granted in order to influence the actions of a representative of a government agency.

Each of your employees is required to observe the rules of antitrust and competition law. In this respect, all agreements, concerted practices, informal discussions or gentlemen's agreements with or towards (potential) competitors that are aimed at restricting competition or have the effect of restricting competition are prohibited. This includes, in particular, the exchange of strategically important information, price fixing, agreements on production or sales quotas, allocation of customers, division of regional markets, submission of sham bids in tenders, agreements to participate in boycotts, refusal to supply. The appearance of such conspiratorial agreements with or towards (potential) competitors must also be avoided.

On the other hand, it is not permitted to set anti-competitive prices for sales partners at other sales levels or to take measures to specifically eliminate/restrict (pure) online trading.

Furthermore, each of your employees must strictly apply and comply with all environmental protection, occupational health and safety regulations. Each of your employees is jointly responsible for occupational safety in their area.

## **2. Dealing with business partners and third parties**

You are fair in business competition and offer your business partners fair contractual arrangements. Suppliers are not unfairly favoured or hindered by you when awarding contracts.

Your employees are obliged to maintain confidentiality with regard to all confidential information from or about your business partners.

None of your employees may offer or grant bribes or other monetary benefits in connection with their business activities. Gifts in kind, invitations and personal favours to business partners, competitors or other third parties may only be offered if they are within the bounds of normal business practice, i.e. they must be customary in business, not of an unreasonably high value and not exceed the personal standard of living of the parties involved, and must not be intended to influence business decisions in a dishonest manner or in circumvention of legal regulations.

Gifts in kind, invitations and personal favours from business partners, competitors or other third parties may only be accepted if such benefits are appropriate in the context of generally accepted business practices and with regard to the occasion and scope and insofar as these invitations, gifts in kind or personal favours are not capable of influencing your business decision.

The acceptance of direct monetary benefits (including shopping vouchers) is prohibited without exception. It does not matter whether the gifts or other benefits are intended to benefit the employee directly or indirectly.

### **3. Avoidance of conflicts of interest:**

Each of your employees must ensure that personal relationships or interests have no influence on business activities.

Decision-making processes may only be guided by objective considerations.

### **4. Discrimination - behaviour towards each other**

The dignity and personality of every employee or business contact must be respected. Like us, you do not tolerate any discrimination, harassment or offence in the working environment. Each of your employees has a right to fair, polite and respectful treatment by superiors, employees and colleagues.

Your company does not discriminate in hiring, compensation, access to training, promotion, termination of employment or retirement. No one in your company may be unfairly disadvantaged, favoured, harassed or marginalised because of their race, gender, age, religion or belief, nationality, ethnic origin, physical constitution, appearance, sexual identity, marital status, social background, membership of employee organisations including trade unions, political views or other personal characteristics.

## **5. Information protection**

Each of your employees is obliged to maintain confidentiality in all internal confidential matters of the company. Confidential matters must be protected from unauthorised access by third parties. Third parties in this sense also include family members in the broader sense.

Confidential matters are all those matters that are labelled as such or that are not publicly known and should not be made public, e.g. because they could be of use to competitors or could harm the company or its business partners if disclosed. This includes, for example, details relating to the organisation and strategic direction of our company, business, manufacturing, research and development processes, internal reporting figures and information in connection with disposals, mergers and acquisitions.

Knowledge of internal confidential matters may only be used by your employees, consultants or subcontractors for operational purposes. In internal company dealings, too, care must be taken to ensure that confidential plans and processes are only passed on to those employees who need them to fulfil their duties.

All records and reports that are prepared internally and passed on externally must be correct and truthful. This applies equally to records for purely internal purposes. No records, reports, entries or documents may be falsified, distorted, misdirected, intentionally misleading, incomplete or suppressed.

## **6. Data protection**

We attach great importance to protecting the personal data of our employees, customers and business partners and to complying with the applicable data protection laws. We expect the same from our business partners. The simpler and more extensive electronic data processing becomes, the more important the protection of personal data becomes (e.g. name, (e-mail) address, date of birth, tax number, health information). Therefore, you hereby undertake to only pass on, process and store such personal data in accordance with the applicable laws. Violations of data protection regulations are punishable by severe fines and can also result in high claims for damages against the company. Careful handling of the personal data of your employees, business partners and customers also creates trust and can therefore even be a competitive advantage. To this end, you undertake to regularly train and sensitise your employees and to oblige them to maintain data secrecy in accordance with the GDPR.

## **7. Wages**

The wages for regular working hours and overtime in your company meet or exceed industry standards. According to your company guidelines, each employee should be paid according to his or her actual contribution.

No illegal or unauthorised wage deductions or punitive wage deductions are made.

## **8. Working hours**

Your company complies with the applicable European and national laws and industry standards on working hours. The maximum permitted weekly working hours apply in accordance with European and national legislation. Each of your employees has the right to at least one day off after six consecutive working days.

## **9. Health and safety in the workplace**

Your company has established clear rules and procedures to ensure health and safety in the workplace. These are followed at all times. You maintain an occupational safety management system in accordance with applicable European and national laws and industry standards.

## **10. Child labour**

Child labour is prohibited in accordance with the provisions of the ILO and United Nations conventions and/or national legislation. Any form of exploitation of children is prohibited. Your company complies with these provisions and is clearly opposed to child labour.

## **11. Forced labour and disciplinary measures**

Your company does not use any form of forced labour, for example by requiring a deposit or withholding identity documents at the start of the employment relationship, or prison labour that violates basic human rights. The use of corporal punishment, psychological or physical coercion and verbal abuse is prohibited.

## **12. Dealing with assets**

Every employee is obliged to handle the company's assets responsibly. Each employee is also responsible for protecting the assets. Assets include not only tangible assets/property, but also intangible assets such as intellectual property, trade secrets and confidential information as well as the ideas and knowledge of our employees.

### **13. Environmental and safety issues**

Procedures and standards for waste management, the handling of chemicals and other hazardous substances, their disposal, emissions and wastewater treatment must meet or exceed the minimum legal requirements.

### **14. Compliance with specifications**

We require you to comply with all agreements and regulations listed in this Code of Conduct for Business Partners as well as all other applicable laws, guidelines and regulations. Furthermore, you guarantee that this Code of Conduct for Business Partners will be made available to all your employees in a language they understand.

We also require you as a business partner to commit your own business partners or subcontractors to this or an equivalent code of conduct.

As a result, you undertake to set up suitable and appropriate monitoring mechanisms and communication channels, namely a compliance management system. This is the only way to ensure compliance with the law in a company.

Granting access: Upon justified request, you will grant our company access to and information about your mechanisms for the prevention and lawful handling of legal violations (compliance management system). We are authorised to exercise these rights of inspection and information through third parties, provided that they in turn have been obliged to maintain confidentiality in this regard.

Sanctions: We reserve the right to impose sanctions on our business partner in the event of non-compliance with the obligations arising from this Code of Conduct for Business Partners. In the case of non-serious violations, we will give you the opportunity to implement appropriate remedial measures within a reasonable period of time and to respond appropriately to the violation.

In the event of a serious or repeated breach or failure to respond appropriately to a breach of this Code of Conduct for Business Partners, this may entitle us to terminate the business relationship immediately.

Depending on the type and severity of the violation, we also reserve the right to claim damages or other graduated/appropriate sanctions. It is possible to report violations of the law or information on possible grievances (also in accordance with the applicable supply chain laws) via our whistleblower system. Details can be found in the [whistleblower system](#).