

Code of Conduct of ERBACHER the food family for external business partners

ERBACHER the food family is a family business that produces and distributes products for the nutrition of people and animals.

All our companies are to serve the well-being of people. We pursue a value-oriented, credible and sustainable strategy.

Our dedicated employees are important for the success of our companies.

The responsibility we take for creation is visible through our sustainable practices. The transboundary responsibility for our fellow men is expressed through the work of the nonprofit ERBACHER-Foundation. (Extract from the corporate guidelines)

To concretize the company guidelines, the following standards have been formulated. They are followed at all times and are valid for all companies of the family-owned enterprise Josera-Erbacher especially for Josera GmbH & Co. KG, FarmChamps GmbH & Co. KG, Josera petfood GmbH & Co. KG, foodforplanet GmbH & Co. KG, Erbacher Food Intelligence GmbH & Co. KG, Josera Erbacher Service GmbH & Co. KG, food family Agency GmbH & Co. KG, Josera Erbacher Service GmbH & Co. KG FarmChamps GmbH & Co. KG, Josera Polska Sp. zo.o., Josera petfood Sp. zo.o, LLC Josera Ukraine sowie Join the food family Ltd (Tansania).³

The present code of conduct makes clear the moral concept of the family enterprise of Josera-Erbacher and fixes the behavioral norms which enables our enterprise and our employees to protect a good reputation as well as the trust of the companions, business partners and other important institutions and groups.

³ As of December, 2022

The code is valid to all employees including the enterprise management and the owners regardless of their gender and their position in the enterprise.

In order to ensure compliance with the above-mentioned standards in accordance with the applicable supply chain due diligence laws at national as well as EU level, we herewith also oblige all our business partners, including our suppliers, service providers or other sales/cooperation partners, to follow the guiding principles of this Code of Conduct and to oblige their respective suppliers and business partners accordingly (and thus ultimately across the entire supply chain).

Scope of application: This Code of Conduct applies to all companies or economic operators with which the group of companies [Erbacher the food family](#) enters into or maintains a business relationship.

This Code of Conduct is an integral part of the business relationship between you and the companies of [Erbacher the food family](#).

For reasons of easier readability, gender-specific differentiation, such as male/female/diverse employees, has been omitted. Corresponding terms apply to all genders (m/f/d) for the purpose of equal treatment.

1. Observance of laws

Your company or group of companies (hereinafter together: “your company”) complies with all applicable European, international and national laws and regulations, as well as all industrial minimum standards. You don’t gain any advantages by an unlawful or unethical exercise of our business.

You are committed to the principle to pursue your commercial aims with ethically and juridically means considering the legal regulations. You do not tolerate any form of bribery or corruption.

It may not be offered any inadmissible or unseemly personal advantages of any kind to representatives of authorities neither directly nor indirectly. In dealing with public bodies attention is to be paid particularly to the fact that no advantages are promised or are granted to influence an action of an authorities' representative. Every of your employees is obliged to follow the rules of competition and antitrust law.

Prohibited are on the one hand all agreements, coordinated behaviour patterns, informal talks or gentlemen's agreements with or vis-à-vis direct competitors, which are aimed at a restriction of the competition. In particular price agreements, arrangements about production or sales rates, allocation of customers, division of regional markets, delivery of false offers at adverts, agreements about the participation in boycotts and refusals of delivery are unacceptable. Even the appearance of such conspiratorial agreements is to be avoided.

On the other hand, anticompetitive price specifications vis-à-vis distribution partners at other distribution levels are not permitted, nor are measures to specifically eliminate/ restrict (pure) online traders.

Your employees have to apply and to obey all environmental protection safety regulations, industrial safety regulations and working safety regulations strictly. Every employee is jointly responsible for working security in his department.

2. Contact with business partners and third

You are fair in the enterprise competition and offer fair contracts to your business partners. Your suppliers are not preferred with the assignment of contracts nor are hindered.

All your employees are obligated to treat all information from or about your business partners confidentially.

None of your employees is allowed to offer or grant bribes or other pecuniary in addition with his business activity. Material presents, invitations and personal favors to business partners, competitors or other third ones may be offered only if they keep in a frame which corresponds to the generally usual business practices. That means

they must be commercial-customary, have no immoderate high value and also do not cross the personal standard of living of the partners and not be aimed to influence commercial decisions in a dishonest manner or in circumvention of legal regulations.

Material presents, invitations and personal favors from business partners, competitors or other third ones may be accepted if they are measured within the scope of generally usual business practices and in view of occasion and extent and as far as the invitation, material presents or personal favors are not be able to influence the enterprise's decisions.

To accept direct pecuniary donation (including shopping vouchers) is prohibited without exception. It is not important if the gifts or other donation come directly or indirectly to the employee.

3. Avoidance on conflicts on interests

Every one of your employees has to pay attention to the fact that personal relations or interests do not influence the business activity. Decision-making processes may only be guided by objective considerations.

4. Discrimination – Behaviour among each other

The dignity and the personality of each of your employees are to be respected.

You do not tolerate any discrimination, nuisance or insults in the working sphere. Every employee has the right on fair, polite and respectful treatment by superiors, employees and colleagues.

Your company renounces all forms of discrimination in hiring, remuneration, access to training, promotion, termination of employment or retirement on the basis of gender, age, religion, race, caste, social background, disability, ethnic or national origin, nationality, membership in workers' organizations including unions, political affiliation, sexual orientation or other personal characteristics.

5. Safety of Information

Each of your employees is obliged to discretion with all internal confidential matters of the enterprise. Confidential matters are to be protected from unauthorized

examination /disclosure by thirds. Thirds in this sense are also family members (in a broader sense).

Confidential are all those matters which are marked as such or those where it is supposed that they are not known publicly or that they should not be published/disclosed, for example, because they could be of use for competitors or could damage, with their disclosure, the enterprise or our business partners. Examples for these are the details which concern the organization and the strategical alignment of the enterprise, commercial processes, manufacture processes, research processes and developing processes; figures of the internal reporting being as well as information in connection with disposals, mergers and acquisitions.

Knowledge about internal confidential matters may be used by the employees exclusively for operational purposes. In internal company dealings, it must also be ensured that confidential projects and processes are only passed on to those employees who really need them for the fulfilment of their duties.

All recordings and reports which are made internally and are given out must be correct and truthful. The same applies accordingly to recordings for purely internal purposes. Recordings, reports, registrations or documents may not be faked, be distorted, be delusive intentionally, false-escorted, or issued incompletely or suppressed.

6. Data protection

You have to attach great importance to protecting the personal data of your employees, customers and business partners and to complying with the applicable data protection laws. The simpler and more extensive electronic data processing becomes, the more significant the protection of personal or person-related data (e.g. name, (e-mail) address, date of birth, tax number, information on state of health etc.) becomes. Such personal data may only be disclosed and processed 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 or companies. Careful handling of the personal data of your colleagues, business partners and customers also creates trust and can thus even be a competitive advantage. To this end, you regularly train and raise awareness among your employees.

7. Wages

The wages for regular working hours and overtime of your employees meet or exceed the industry standards. According to your company guidelines every employee should be paid according to his actual contribution.

No unlawful or unauthorized deductions from wages are carried out, nor deductions from wages as a penal measure.

8. Working hours

Your company complies with all applicable European and national laws and regulations, as well as all industrial minimum standards in relation to working hours. The maximum weekly hours of work are as defined by European and national legislation. Overtime shall be on a voluntary basis and are compensated for separately. Every of your employees has the right to at least one free day following six consecutive working days.

9. Health and safety at work

Your company have established clear rules and procedures for ensuring health and safety at work. These are obeyed at all times. You maintain an occupational health and safety management system in accordance with the European and national laws and regulations, as well as all industrial minimum standards.

10. Child labor

Child labor is forbidden as defined by ILO and the United Nations and / or national legislation in your company. All forms of child exploitation are prohibited. Your company complies with these provisions and clearly speaks out against child labor.

11. Forced labor and disciplinary measures

In your company, there is no form of forced labor, for example, obtained by the deposit of a security or the restraint of identification papers at the beginning of the employment. Likewise for imprisonment labor, which violates basic human rights. The use of corporal punishment as well as psychological or physical coercion and verbal abuse is prohibited.

12. Handling of assets

Every one of your employees has to handle the companies' assets responsibly.

Every one of your employees is also responsible to protect these 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 your employees.

13. Environmental and safety issues

Your procedures and standards for waste management, the handling of chemicals and other hazardous substances and their disposal as well as emissions and sewage treatment must meet the minimum legal requirements or exceed them.

Your company maintains an independently certified environmental management system.

14. Observance of the requirements

We herewith oblige you to comply with all agreements and requirements set forth in this Code of Conduct and all other applicable laws, directives and regulations. You further warrant that this Code of Conduct is made available to all your employees in a language they understand. In addition, as a business partner, we require you to oblige your own business partners or subcontractors to this or an equivalent Code of Conduct accordingly.

Along with this, 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 that a company complies with the law.

Granting of 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 entitled to exercise these rights of inspection and information through third parties, provided that they in turn have been obligated to confidentiality in this regard.

Sanctions: In the event of non-compliance with the obligations arising from this Code of Conduct, we reserve the right to impose sanctions on our business partner. In the case of minor 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 violation or failure to respond appropriately to a violation of this Code of Conduct for Business Partners, this may entitle us to terminate the business relationship immediately. We also reserve the right to claim damages or other graduated/ appropriate sanctions depending on the nature and gravity of the violation.

It is possible to report violations of the law or information on possible abuses (also in accordance with the applicable supply chain laws) via our whistleblower system; for details, please refer to **Appendix 1**.

Date/ place

Authorized signatory of the company

Appendix 1

Notification of suspected cases

Compliance with laws, rules and internal regulations is a top priority for us. Only if we act in compliance with the law and with integrity can we protect our group of companies, our employees and our business partners.






But where people work, mistakes can also be made. We have introduced a whistleblower system in order to meet the requirements imposed by various laws and to be able to deal fairly and appropriately with reports of violations or misconduct. Suspected cases can be reported to the whistleblower system confidentially and, if national legal requirements permit, anonymously if desired.

This includes, for example, violations of our Code of Conduct, antitrust law, environmental regulations, human rights violations, as well as suspected corruption, theft, discrimination or bullying, applicable laws or other requirements. In addition to employees, business partners, customers and other third parties can submit reports if they have specific information about violations of rules. A report can be submitted in any language. If necessary, a translation will be arranged. Particularly in the case of anonymous reports, please ensure that the report is formulated as specifically as possible and, if necessary, that documents supporting your suspicions are enclosed. It is also helpful if you are available to answer further questions from reporting office. Otherwise, the facts of the case cannot be discussed and you will not be informed about the progress of the proceedings.

Contact:

To guarantee the greatest possible protection for whistleblowers and those affected, we have set up an independent trust office, the atarax group of companies. Trust is their business, here you are in good hands.

To ensure complete confidentiality, the following communication channels are available:

	Whistleblower telephone hotline at: 0049 / 160 / 96210839 (Monday - Friday from 08.30 - 17.00, except public holidays)
	<u>By email to: compliance@atarax.de</u>
	<p><u>Via the whistleblower portal / contact form:</u></p> <p><u>https://www.atarax.de/de/startseite/leistungen/hinweisgeberportal</u></p> <p><u>With the link you will be forwarded to the whistleblower portal of the atarax group of companies. Of course, this forwarding will not be traced back.</u></p>
	<p><u>Written suspect notification by mail to:</u></p> <p><u>atarax group of companies, Luitpold-Maier-Str. 7, D-91074 Herzogenaurach, Germany.</u></p>
	<u>At the whistleblower's request, it is also possible to make a suspect notification through these channels within a reasonable period of time during a confidential personal meeting.</u>

For information on the processing of your data, please refer to our data privacy notice in Appendix 2.

Procedure:

Provided that the contact details have been provided, the person making the report will receive an acknowledgement of receipt from the reporting office immediately after the report has been received.

The report or complaint is then carefully checked for plausibility. If there are concrete indications of a violation of the rules, a specific internal investigation will be initiated, if necessary, as well as further appropriate follow-up measures (e.g. improvement of internal processes).

The information is processed in a fair and confidential process and in compliance with data protection requirements. The principle of proportionality is also observed. The information and complaints are also documented.

If the contact data of the person providing the information is known, contact is maintained with the person providing the information - in accordance with the respective legal requirements - and, if necessary, the facts of the case are discussed and information is provided on the progress of the procedure in a timely manner.

Information provided will only be passed on to those persons who must be involved in processing the report, insofar as this is absolutely necessary to determine the facts of the case.

All information received will be documented, stored and deleted in accordance with legal requirements.

Appendix 2

Transparency and information obligations for whistleblowers and other persons involved in the matter within the framework of the whistleblower system in accordance with the EU-General Data Protection Regulation (GDPR)

With this document, we inform you about the processing of your personal data by the Erbacher Group of Companies - The Food Family as well as its participating companies and the rights to which you are entitled under data protection law.

Responsible party/data protection:

The responsible body for data processing is the respective participating company to which the notification refers.

Address: Industriegebiet Süd, 63924 Kleinheubach, Germany

Contact information: <https://food.family/kontakt/>

Contact data protection:

datenschutz@atarax.de or datenschutz@joseira-erbacher.de and datenschutz@foodforplanet.de

Categories/origin of data:

If you make a report via our whistleblower system, the personal data you provide will be processed in order to handle your report and, if necessary, take further action. In principle, you have the option of making anonymous reports. The personal data processed depends on the content of your report.

We may process your personal data in the event that you are an accused person or other person involved in the matter in order to check the report made via the whistleblower system and to investigate the alleged compliance and legal violations. The data that is processed depends on the specific report in each case and also on what information, for example, a whistleblower has provided about you. For example, the following data may be processed:

Contact data (such as private address, mobile or landline number, e-mail address)

Master data (surname, first name, name affixes, date of birth)

Photos/video recordings

Time recording data

Purposes and legal basis of data processing:

When processing your personal data, we always comply with the provisions of the GDPR, the BDSG and all other legal provisions (such as BetrVG, ArbZG, etc.).

If you are a reporting person, the processing of your data is based on your voluntary information as well as within the framework of the legal provisions according to the Whistleblower Protection Act, Art. 6 para. 1 p. 1 lit. a, lit. c GDPR and in the case that you are employed by us, according to Art. 88 GDPR in conjunction with. § 26 para. 2 BDSG.

In addition, we process your personal data as a data subject if this is necessary to protect the legitimate interests of the company or a third party (Art. 6 para. 1 lit. f, lit. c GDPR in conjunction with § 130 OWiG). We have a legitimate interest in processing the personal data for the prevention and detection of violations and grievances that are reported via the whistleblower portal of our group of companies. In addition, your personal data is processed insofar as this is necessary for the fulfillment of legal obligations.

Storage period of the data

As soon as your data is no longer required for the above-mentioned purposes, it will be deleted by us, but no later than three years after the conclusion of the proceedings.

Recipients of the data/categories of recipients

In our company, we ensure that only those persons receive your data who need them to process the whistleblower submitted via the whistleblowing system.

In certain cases, service providers (e.g. IT service providers), support us in fulfilling our tasks. The necessary data protection contracts have been concluded with all service providers.

Furthermore, in cases prescribed by law, we are obliged to transmit certain information to bodies such as investigating authorities.

Third country transfer/intention to transfer data to third countries

Data is only transferred to third countries (outside the European Union or the European Economic Area) if this is absolutely necessary for processing the report, is required by law or if you have given us your consent to do so.

We do not (currently) transfer your personal data to any service provider or group company outside the European Economic Area.

Rights of the data subjects:

The rights for you as a data subject are standardized in Art. 15 - 22 GDPR.

This includes:

The right to information (Art. 15 GDPR).

The right to rectification (Art. 16 GDPR)

The right to erasure (Art. 17 GDPR)

The right to restriction of processing (Art. 18 GDPR)

The right to object to processing (Art. 21 GDPR)

The right to data portability (Art. 20 GDPR)

Insofar as you have voluntarily provided data as the reporting person, you may revoke the consent for any data processing at any time with a view to the future.

To revoke the consent and assert the other rights, please contact compliance@atarax.de. The same applies if you have questions about data processing in our company. In addition, you can lodge a complaint against data processing with a data protection supervisory authority.

If we process your data to protect legitimate interests, you may object to this processing at any time for reasons arising from your particular situation.

We will then no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing that override your interests, rights and freedoms, or the processing serves to assert, exercise or defend legal claims.

Automated individual case decisions:

We do not use purely automated processing to reach a decision.