

Our Code of Conduct: Working for Veganz

Preamble

The key to corporate success lies in a company-wide corporate culture marked by morality, ethics and personal integrity, honesty and responsibility. Our Code of Conduct is the guiding framework for all employees of the Veganz Group in order to ensure this success.

These principles are intended to promote impeccable behaviour in the workplace, based on honesty and fairness in our dealings with other employees as well as with customers, suppliers, competitors, government authorities and the public.

The integrity and the good reputation of a company are the responsibility of all employees.

All employees must conduct themselves in such a way that neither personal dependencies nor obligations can arise.

All business decisions and actions must comply with the applicable laws and other relevant internal and external regulations. Only fair competition and strict compliance with the legal system can lead to stable business cooperation that benefits all. Corruption, embezzlement and fraud distort competition, result in higher costs and destroy the trust of customers and suppliers, as well as endangering our competitiveness and ultimately our jobs.

Being a part of the Veganz Group and sharing its identity requires each individual to take responsibility. We are aware that the company's success and the reputation it has earned through the daily commitment of its employees can be damaged by even a single act of misconduct. The Code of Conduct must be adhered to. Misconduct will not be tolerated.

1. Introduction

This Code of Conduct deals with the question 'How do we want to work?' It sets out the principles that should characterise our actions in dealings with third parties, as well as within the Group. In general, we want to work in a way that makes people trust us. Trust is the foundation for all cooperation. Gaining it is a long and arduous process. Losing it can happen very quickly. This alone illustrates the importance of our Code of Conduct: it provides guidance as to how we can justify and gain trust in our daily work. It also gives us practical advice on what we must refrain from doing so as not to jeopardise this trust.

2. Who does the Code of Conduct apply to?

Our Code of Conduct applies to all employees of the Veganz Group: to managing directors, managers and all employees. Likewise, it applies to consultants and

persons who are functionally equivalent to employees, such as temporary workers.

Ethical and legally impeccable behaviour is the responsibility of each individual. Culpable, deliberate misconduct is sanctioned within the framework of the legal provisions.

3. Veganz guidelines

3.1 Legally compliant

We act in accordance with the relevant and applicable legislation and our own guidelines. We comply with existing trade controls, import and export control regulations and economic embargoes.

3.2 Delighted customers

We are aware of the responsibility we have towards our customers. They place their trust in us and we do not want to disappoint them. When acquiring and serving our customers, we comply with all applicable legal regulations. Customer data is collected, processed and used by us and our sales partners exclusively on the basis of the relevant legislation and our own guidelines.

3.3 Treating with respect

Our actions are based on ethical principles and we create a climate of appreciation and mutual trust throughout the Veganz Group by respecting the individuality of others and making no distinctions with regard to age, gender, religion, skills, origin or sexual orientation. We have high regard for the family and different cultures, as well as for our colleagues, customers, partners, suppliers, investors and the companies of the Veganz Group. We do not tolerate any form of discrimination or harassment and always critically examine our own actions.

3.4 Integrity in dealing with customers, business partners and competitors

Private interests and personal benefits are not allowed to influence our business decisions. We refrain from all forms of corrupt behaviour and also seek to avoid even the mere appearance of it.

We behave in a proper and legally compliant manner when dealing with our clients and only contact them within the legally permissible framework.

We must not offer, promise or grant any unauthorised benefits to members of the public sector in Germany or abroad nor to the decision-makers of private-sector companies and business partners/suppliers in order to achieve conduct that is advantageous for the Veganz Group. We must pay particular attention to this in the case of gifts and invitations to business meals. Employees who allow themselves to be influenced improperly by customers, suppliers or service providers will be disciplined and held accountable under labour law – irrespective of the consequences under criminal law.

Likewise, we do not allow ourselves to be promised, offered or granted any unauthorised benefits by members of the public sector, decision-makers of private-sector companies or customers. Any such attempts to unfairly influence our employees will not be tolerated; they must be reported to the relevant line manager.

In all business relationships, we pay particular attention to the legal requirements for ensuring free competition. We do not engage in price-fixing agreements between competitors, which are prohibited by law.

3.5 Handling information

Data security and data protection are of the utmost importance for the Veganz Group. We therefore protect company data as well as personal customer and employee data against unauthorised access or misuse, loss and premature destruction by using all suitable and appropriate technical and organisational means available. We only collect and process sensitive personal data with the consent of the data subject if a clear legal provision permits us to do so or if it is necessary for the fulfilment of a contractual obligation. Moreover, we collect, process and use personal data only to the extent necessary and only for the intended purposes. We respect the comprehensive rights of those individuals whose data we collect, process and use. In addition, we protect information on operational matters and do not communicate information from and about our Group to the outside world without good reason.

3.6 Handling gifts and samples

Gifts and product samples are not accepted or distributed as a matter of principle.

This applies to monetary gifts as well as gifts in kind. Monetary gifts are amounts in any form and currency. Gifts in kind are any items of value that cannot be considered as promotional gifts. Travel, services, tickets to sporting, musical or other cultural events, promotional bonuses and discounts are also considered to be gifts.

Promotional gifts should be of such a value that by accepting them the recipient is not subject to any binding dependency. They must follow the principle of avoiding any appearance of dishonesty or impropriety on the part of the giver and receiver. A maximum value of €5.00 is assumed for this purpose. In all cases of doubt, the line manager's approval must be sought.

Product samples within the usual scope are only accepted by the purchasing department in order to be able to carry out the corresponding checks and examinations, or for archiving purposes.

3.7 Clear separation between business and pleasure

In the case of expenses where business and pleasure are so closely intertwined that it is difficult to make a precise distinction, the costs must be borne privately, especially with regard to gifts or hospitality.

If 'unavoidable' hospitality is provided by third parties, this must be reported to the immediate line manager.

In the case of hospitality provided by suppliers, service providers and others, care must be taken not to create a one-sided 'hospitality culture'. If it is in the interests of the company to do so, the company should also bear the costs of hospitality on a rotating basis in order to signal to the other party that, for example, a meal together is regarded as a genuine, objective working meal.

Anything beyond invitations to meals is regulated in these guidelines. However, in the event of 'ambiguous' invitations, the CEO should be informed.

3.8 Avoiding conflicts of interest through secondary employment or investments

a) Secondary employment

Employees shall place their full working capacity at the disposal of the company. Any gainful secondary employment requires the prior written consent of the CEO. The same applies to active participation in a business undertaking and to membership of supervisory bodies of other companies.

Secondary employment for companies with which the company is in competition is prohibited.

Publications and lectures by employees that affect the interests of the company require the consent of the CEO.

b) Investments

Employees must give prior written notice of any equity investments with a decisive, reciprocal influence in companies with which the company has a business relationship, and these must be approved by the CEO.

3.9 Veganz donations – the Executive Board decides on donations.

Donations must be within the legal boundaries and are handled exclusively by the Executive Board.

3.10 Veganz's social principles

Veganz:

- 3.10.1 recognises and respects the cultural, social, political and legal diversity of all nations and societies and strongly advocates the observance of internationally applicable human rights;
- 3.10.2 recognises the fundamental right to freedom of association, as well as the right to collective bargaining within the framework of national laws and regulations;
- 3.10.3 strongly endorses the prohibition of all forms of forced labour;
- 3.10.4 supports the abolition of exploitative child labour and ensures that within the Veganz Group the minimum employment age is respected in accordance with the relevant national regulations;
- 3.10.5 rejects all forms of discrimination in the workplace and explicitly supports the promotion of equal opportunities and employee diversity, taking into account the respective cultural circumstances;
- 3.10.6 respects the right to adequate remuneration on a contractual basis, in line with the respective statutory minimum wage and the respective national labour market;
- 3.10.7 ensures compliance with the respective national regulations on working hours and regular paid leave;
- 3.10.8 supports the continuing education of its employees, which is also in the interest of the company;
- 3.10.9 regards the occupational health and safety of its employees as a major priority.

4 Reporting obligation of the employee

Should we be offered unauthorised benefits or otherwise become aware of or suspect a violation of our Code of Conduct, we shall inform our line manager. The Executive Board is committed to preventing corruption. It expects employees to comply with their obligation to report corrupt behaviour. Every employee is jointly responsible if he or she is aware of corrupt behaviour and does not report it.

Employees who comply with this obligation to report shall not suffer any disadvantage, provided that they have themselves complied with the applicable Code of Conduct. For this reason, their reports will be treated in the strictest confidence.

5 Control

Experience shows that organisational principles are only successful if they are accompanied by suitable control measures. These are to be implemented in the form of appropriate controls and plausibility checks.

6 Sanctions

Misconduct and violations of conduct requirements with regard to integrity and respect, as well as violations of legal provisions and guidelines, can have serious consequences not only for the individual themselves, but also for the entire Group. For this reason, misconduct cannot be tolerated. The Veganz Group will strictly penalise deliberate, unlawful conduct and violations of legal provisions without regard to the rank and position of the acting person within the Group. In the event of violations of the Code of Conduct and legal regulations, the necessary organisational, disciplinary and legal measures are to be taken in order to adequately counteract the identified violations – irrespective of any consequences under criminal law. Depending on the severity of the violation, this may also mean dismissal.

7 Confirmation

I hereby confirm that I have been informed about and received the 'Code of Conduct for the Prevention of Corruption in Internal and External Relations'.

We expect all our employees to conduct themselves in accordance with these guidelines. Implementing our Code of Conduct on a daily basis is both our aim and our commitment.