

Code of Conduct – Suppliers and Service Providers

Foreword

The Ospelt Group has steadily developed into an international group of companies over the last four decades. Its development has been guided by the values and ethical principles of its founder, Herbert Ospelt. These principles include first-class innovation and quality as well as the principle of legality, which obliges us to comply with the laws of those countries where we operate. Our conviction is that reliability, credibility and, in particular, legality are essential cornerstones of business success.

We are committed to acting responsibly, particularly in terms of how we source our materials and services and with our cooperation partners.

We operate in accordance with the BSCI Code of Conduct.

We evaluate and select our suppliers and service providers not only based on economic criteria. We consider environmental protection, compliance with human rights, labour and social standards, and anti-corruption measures.

We also expect our suppliers and service providers to comply with applicable national and international legislation and to observe internationally recognized environmental, social, and corporate governance (ESG) standards.

Scope of application

The "Code of Conduct – Suppliers and Service Providers" of the Ospelt Group is a binding framework for the actions of the Ospelt Group and its suppliers and service providers.

Our suppliers and service providers are required to implement our "Code of Conduct – Suppliers and Service Providers" and to always observe our principles in the context of our cooperation and to incorporate them in their supply chain. They are required to provide complete and comprehensive information to facilitate our examination on the integrity of their business partners (third party due diligence).

Our suppliers and service providers are to work towards organising appropriate training measures to provide their managers and workers with the necessary knowledge and proper understanding of existing laws and regulations, generally accepted standards as well as the standards desired under this "Code of Conduct – Suppliers and Service Providers".

1. Anti-corruption

The Ospelt Group operates legally and ethically worldwide. We also demand the same from our suppliers and service providers. Corruption or bribery are not to be tolerated in any form.

Agreements or ancillary agreements to agreements which relate to the taking of advantage or favouring of individual persons in connection with the brokering, awarding, delivery, handling, and payment of contracts are not permitted. Attempts by suppliers and service providers to unfairly influence individual persons of the Ospelt Group in their decision-making process lead, depending on the individual case, to the suspension of orders or even the termination of the contract. Commissions and remuneration paid to suppliers are to be commensurate with their contractual performance. There is to be no agreement on performance where it may be assumed that the intention is, in whole or in part, to facilitate the payment of bribes. The acceptance and giving of gifts and other benefits (e.g., participation in events not directly related to business), including invitations (from and to suppliers), is to be handled in an extremely restrained manner. Their financial framework is to be measured in such a way that their acceptance neither requires concealment on the part of the recipient nor places them in a state enforced dependency.

We demand that our suppliers and service providers have proven processes in place in the form of strong controls and regulations to suppress any kind of corruption.

2. Conflict of interest

All conflicts of interest that are likely to adversely affect the business relationship with Ospelt Group are to be avoided. Suppliers and service providers are aware that a conflict of interest occurs whenever an employee's material personal interests are incompatible with the responsibilities of their position in the company. All such conflicts are to be disclosed and resolved. Even the appearance of a conflict of interest could be damaging to the reputation of Ospelt Group.

3. Protection of intellectual property rights

Our suppliers and service providers respect our intellectual property, trade secrets and other confidential and proprietary information of the Ospelt Group. No disclosure is permitted to third parties unless this has been expressly agreed to in writing. Any legally required disclosure to offices and authorities by the supplier and service provider must be notified to the Ospelt Group in advance to the extent permissible for this purpose. We only accept the transfer of secret information by our suppliers and service providers if it is absolutely necessary, and this is agreed and confirmed in a written form as a security precaution.

4. Data protection and information security

Personal data is processed exclusively in accordance with the applicable data protection laws.

Our suppliers and service providers are required to take the necessary measures to ensure data protection and information security.

5. Ethical approach

An honest approach is a fundamental basis for our partnership with our suppliers and service providers. We endeavour to provide a fair and equal basis for our suppliers and service providers and make decisions based on objective criteria such as price, quality, and service capabilities as well as reliability and integrity. We expect no personal favours in terms of price, advertising subsidies or marketing assistance. The acceptance of allowances, bribes or similar improper benefits is prohibited. We expect our suppliers and service providers to apply the same high standards with fairness and integrity in their commercial transactions.

6. Labour and human rights

We are totally opposed to illegal child labour as well as forced labour, exploitation, and any other form of unacceptable treatment of employees. We have no engagement with suppliers and service providers who have a proven record of human rights abuses and forced labour, corporal punishment, abuse, involuntary servitude, or other forms of mistreatment.

We are committed to human rights based on the BSCI Code of Conduct and work with suppliers and service providers who comply with the following guidelines:

- Equal working conditions and opportunities for employees regardless of ethnic origin, age group, skin colour, gender, nationality, religion, sexual orientation, or disability.
- Occupational health and safety at all workplaces.
- Contractually agreed wage payments.
- Compliance with legally prescribed working hours and compensation for legally regulated overtime.
- Recognise and uphold the freedom of association and the right to collective bargaining under applicable laws.

7. Occupational health and safety

Our suppliers and service providers ensure that their employees dispose over all requisite work equipment to maintain occupational health and safety. They ensure that all legally prescribed regulations relating to occupational health and safety are implemented and in compliance.

8. Animal welfare

We demand that animals are treated with respect. Pain and stress need to be avoided as far as possible. We expect complete traceability and transparency along the supply chain, as required by law. This information must also be made available immediately upon request.

We reserve the right to conduct inspections and audits of our business partners to keep our promise of quality and responsibility to our customers. In doing so, random checks of the documentation, and, at its own discretion, its own, also unannounced, on-site visits or audits are conducted, or external expert third parties are engaged. The aim of our suppliers should be to see the legally prescribed level of animal welfare as the lower limit and to constantly strive to exceed this threshold. We not only make this demand of ourselves, but also expect a proactive commitment to animal welfare from our business partners.

The purchasing policy requires close coordination between the purchasing department, the quality department, and our business partners to ensure continual development.

Animal welfare specifications apply to all products of the Ospelt Group in the areas of food and pet food with animal raw materials (in particular, it applies to the following product groups: meat products and by-products of all animal species, eggs, products with processed eggs, dairy products, fish, and seafood).

9. Environmental compatibility

The Ospelt Group is committed to protecting the environment and combating climate change.

We therefore demand from our suppliers and service providers:

- Compliance with all applicable laws and regulations on environmental protection.
- Mitigating negative environmental impacts in operations, products, and value chains, especially in the areas of air pollution, greenhouse gas emissions, water discharge, disposal of pollutants and toxic substances.
- Efficient use of resources, application of energy-efficient and environmentally friendly technologies, and reduction of waste and pollutant emissions to air, water, and soil.

When handling chemicals or other environmentally hazardous substances, we expect:

- Ensuring an efficient and functional environmental, health and safety management system for the preventive identification, reduction, or prevention of environmental and personal risks.
- Safe handling, use, storage and disposal of chemicals or other environmentally hazardous substances.

10. International trade regulations

Our suppliers apply and comply with trade and import regulations.

11. Monitoring of compliance

We reserve the right to conduct unannounced audits of our suppliers and service providers for compliance with the standards desired under this "Code of Conduct – Suppliers and Service Providers", also with the involvement of independent certification bodies.

Conclusion:

Ospelt Group expects all suppliers and service providers to report any violation or suspected violation of the "Code of Conduct – Suppliers and Service Providers" to Ospelt Group at compliance@ospelt.com at the earliest opportunity.

If the confirmed suspicion is related to a violation of fundamental or human rights (e.g., child labour), the business relationship is terminated with immediate effect and legal proceedings are initiated as appropriate. Ospelt Group strongly condemns such violations and under no circumstances wishes to be associated with them. Other infringements lead, depending on the individual case, to the non-establishment of the business relationship, suspension of orders in the case of ongoing business relationships, up to and including termination of the contract and, if necessary, the initiation of legal proceedings.

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