



# CODE OF CONDUCT

for Business Partners of Eckes-Granini





## PURPOSE AND SCOPE

This Code of Conduct for Business Partners (Code) defines the minimum standards and principles that Eckes-Granini Group GmbH and its affiliated companies (Eckes-Granini) expect from all business partners, in particular customers, suppliers, service-providers, agents, distributors and other third parties having a business relationship with Eckes-Granini (Business Partners).

Eckes-Granini expects its Business Partners to uphold standards aligned with integrity, transparency and responsible business conduct as a basic requirement for cooperation.

Eckes-Granini is committed to periodically reviewing and updating its compliance expectations, this Code may be modified from time to time. In the event of conflicts between this Code and a future modification, the latest version shall prevail.



## ACCEPTANCE AND ADHERENCE

Acceptance and adherence to this Code is a condition of doing business with Eckes-Granini.

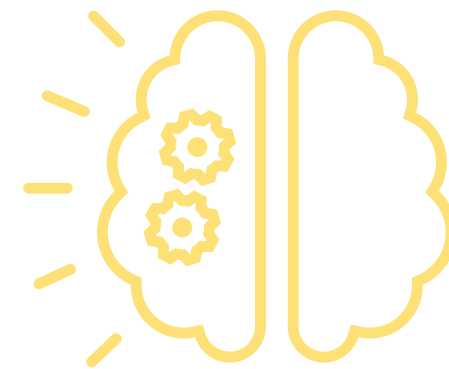
By entering into or continuing a business relationship with Eckes-Granini, Business Partners confirm that they will comply with the principles set out in this Code. They shall ensure that their employees, agents and, where applicable, downstream suppliers and subcontractors comply with the principles set out in this Code.

Eckes-Granini reserves the right to request information and supporting documentation from Business Partners to assess compliance with this Code.

Any breach of this Code may lead to appropriate corrective actions, also including termination of the business relationship.



# MANAGEMENT SYSTEMS AND DUE DILIGENCE



Business Partners shall implement appropriate management systems and procedures to ensure compliance with this Code.

This includes identifying relevant risks and impacts in their own operations and, where relevant, their supply chains, and taking appropriate steps to prevent or mitigate them. This risk-based due diligence approach should be aligned with internationally recognized frameworks, including the UN Guiding Principles on Business and Human Rights, the OECD Guidelines and, where relevant, the International Labour Organization (ILO).



# BUSINESS PARTNER SELECTION PROCESS AND CONFLICTS OF INTEREST

Eckes-Granini reserves the right to conduct integrity screening and risk-based due diligence on Business Partners as part of the selection and onboarding process, and periodically thereafter where appropriate.

Business Partners shall declare in writing any actual or potential conflict of interest before the start of any selection process or without undue delay if such conflict arises during the business relationship.



# INTEGRITY, COMPLIANCE AND FAIR BUSINESS PRACTICES



Business Partners shall comply with all applicable laws and regulations, including anti-corruption, anti-fraud, anti-money laundering, competition law, international trade sanctions and data protection laws. Any form of bribery, corruption or improper advantage is strictly prohibited.

Business Partners shall not offer, promise, give or accept any improper benefit to obtain an unfair or improper advantage, whether actual or perceived.

Business Partners should implement appropriate measures to prevent money laundering and shall not engage in transactions that conceal the origin of illicit funds.

Business Partners shall not have dealings with restricted parties and shall perform appropriate screenings of relevant counterparties where required.

Business Partners shall comply with all applicable international trade sanctions and export control laws.

# FAIR COMPETITION



Eckes-Granini is committed to fair, free and open competition.

Business Partners shall comply with all applicable antitrust and competition laws and shall not engage in anti-competitive practices such as price-fixing, bid-rigging, market allocation or exchanging competitively sensitive information.





## HUMAN RIGHTS AND LABOR STANDARDS

Business Partners are expected to respect internationally recognized human rights, prohibit forced and child labor, provide safe and fair working conditions including fair remuneration and reasonable working hours in line with applicable laws. Any form of discrimination, violence, harassment or inhumane treatment is strictly prohibited.

Business Partners shall adhere to the core conventions of the International Labour Organization (ILO) and ensure that their policies and practices are aligned with these standards.



## HEALTH, SAFETY, QUALITY AND PRODUCT STANDARDS

Business Partners shall comply with all applicable health and safety laws and maintain safe workplaces.

Where relevant, Business Partners shall comply with all applicable quality and product safety requirements and maintain appropriate controls to ensure compliance with the applicable laws and regulations and agreed specifications.





## ENVIRONMENT AND SUSTAINABILITY

Business Partners shall comply with applicable environmental laws and are expected to take appropriate measures to mitigate the environmental impact of their operations.

Eckes-Granini encourages Business Partners to adopt progressive environmental commitments and sustainable practices in their own operations and supply chains.

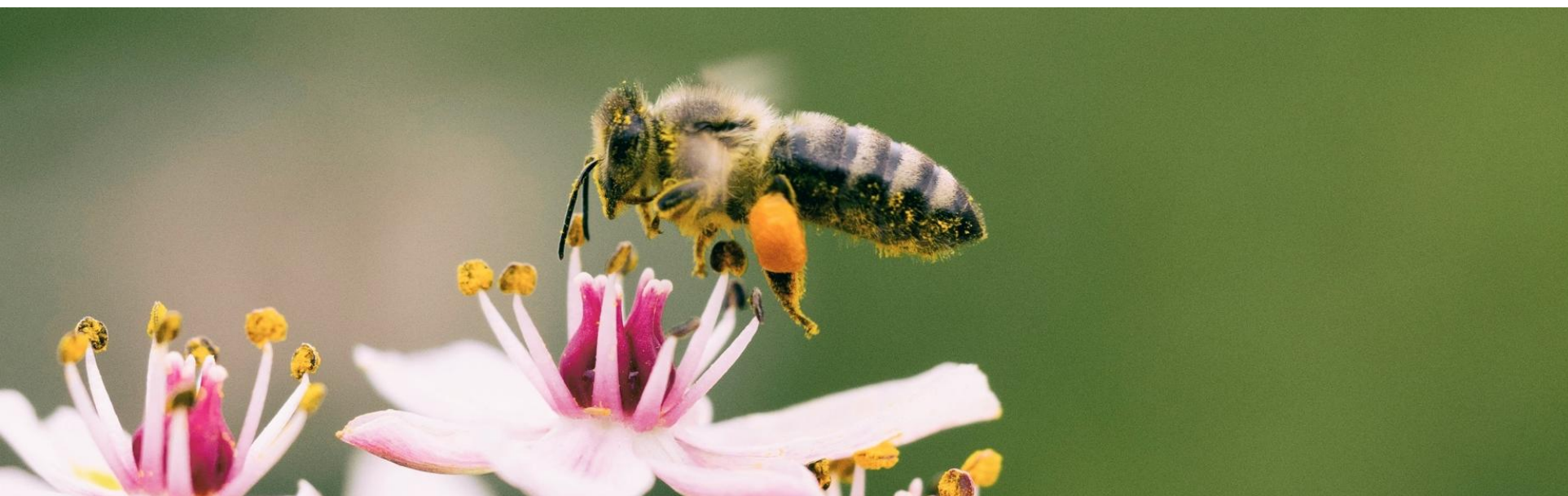


## CONFIDENTIALITY, DATA PROTECTION AND INTELLECTUAL PROPERTY

Business Partners must protect confidential information, trade secrets and personal data obtained in the context of the business relationship and use such information solely for legitimate business purposes as defined within the scope of the business relationship.

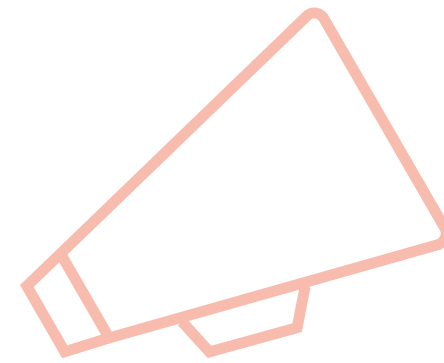
Business Partners shall comply with all applicable data protection and information security laws and maintain appropriate safeguards.

Business Partners shall respect the intellectual property rights of Eckes-Granini and of third parties.





# REPORTING CONCERNS AND NON-RETALIATION



Business Partners are encouraged to report suspected misconduct or violations of this Code. Reports of suspected misconduct may be submitted via Eckes-Granini's whistleblowing tool SpeakUP!, which enables confidential and, where permitted, anonymous reporting.

