

## **Delfort Supplier Code of Conduct**

Delfortgroup AG and its subsidiaries (Delfort) conduct their business based on the key principles of:

- Excellence & Sustainability
- Respect & Responsibility
- Integrity & Transparency

We believe that the strength and the future growth and development of Delfort will be driven by our commitment to good corporate governance along our entire supply and production chain and our customers' appreciation of Delfort's business performance.

We partner with suppliers, manufacturers, contractors, joint venture partners, agents, distributors and consultants (each a "Supplier" and collectively "Suppliers") that support our vision and that demonstrate our values. This Supplier Code of Conduct ("Supplier Code") reflects the standards and business practices we expect from all of our Suppliers. It is our Supplier's responsibility to ensure that the individual(s) accountable for the Supplier's compliance with this Supplier Code is familiar with and ensures compliance with the spirit and letter of this Supplier Code among their employees, agents, subcontractors and supply chain. We reserve the right to terminate any agreement or business relationship in which a Supplier does not comply with this Supplier Code.

### **I. Business Integrity**

#### *Legal Compliance*

Supplier is obliged to comply with all applicable laws and regulations of those countries where they conduct business.

#### *Anti-Corruption*

The Supplier must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third Party, whether public or private. Supplier will not pay or accept bribes, arrange or accept kickbacks and shall not take any actions to violate, or cause its business partners to violate, any applicable anti-bribery laws and regulations including the U.S. Foreign Corrupt Practices and the UK Bribery Acts. Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

#### *Conflict of Interest*

Supplier is expected to report to Delfort any situation that may appear as a conflict of interest and disclose to Delfort if any Delfort employee or professional under contract with Delfort may have an interest of any kind in the Supplier's business or any kind of economic ties with the supplier.

#### *Fair Competition*

Supplier shall not engage in illegal cooperation with competitors including bid rigging, price fixing, market allocations or any other prohibited conduct that limits free and fair competition.

#### *Confidentiality*

Supplier shall secure our company private and confidential information in their possession, use it per our instructions and safeguard it from unapproved or unintended disclosure. This obligation continues after our business relationship ends.

### *Intellectual property*

Supplier shall take appropriate steps to safeguard and maintain confidential and proprietary information of its business partners and use such information only for the purposes authorized for use by the contractual agreement. In case of sub-contracting, sharing of confidential information should be made with the consent of Delfort.

## **II. Labour Standards**

### *Human Rights*

Supplier must respect its employees by ensuring them, within the context of the Supplier's business operations, a right to life, personal liberty and personal security as discussed in the United Nations Declaration of Human Rights.

### *Freedom of Association and Collective Bargaining*

Supplier shall grant its employees the right to freedom of association and collective bargaining in accordance with applicable laws and regulations.

### *Forced Labour*

Supplier must under no circumstances use (or in any other way benefit from) forced labour (e.g. by use of physical punishment, confinement, threats of violence, retaining employees' identification documents etc.).

### *Employment Practices*

Supplier shall only employ workers who are legally authorized to work in their facilities and are responsible for validating employees' eligibility to work through appropriate documentation. All work shall be voluntary and workers shall be free to leave work or terminate their employment upon reasonable notice.

### *Minimum Age for Employment*

The use of child labour by Supplier is strictly prohibited. That indicates that no child below 15 years (or 14 in certain developing countries) is allowed to work, subject to exceptions allowed by the ILO (International Labour Organisation) or national laws.

If Supplier employs young workers, it must demonstrate that the employment of young people does not expose them to undue physical risks that can harm physical, mental or emotional development.

### *Fair and Equal Treatment - protection against discrimination*

Supplier must operate with dignity, respect and integrity in regards the treatment of its employees:

- All employees of the Supplier, regardless of their race, skin colour, religion, gender, age, physical ability, national origin, sexual orientation, political affiliation, union membership or marital status shall be treated strictly according to their abilities and qualifications in any employment decision, including but not limited to hiring, career advancement, compensation and benefits, training, layoffs and termination;
- Any form of psychological, physical, sexual or verbal abuse, intimidation, threat or harassment must not be tolerated;
- Supplier shall respect the privacy rights of its employees whenever it gathers private information or implements employee monitoring practices;
- When Supplier retains direct or contracted workers to provide security to safeguard its personnel and property, Supplier shall make sure that security personnel apply the same standards on fair and equal treatment.

#### *Working time and rest days*

Supplier must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to regular and overtime working hours, work breaks, rest periods, holidays, annual leaves and maternity and paternity leaves. In absence of specific laws or regulations, Supplier shall not require a regular work week over 60 hours, employees shall be allowed at least one day off after six consecutive days of work and any overtime worked shall be voluntary and compensated at premium rate.

#### *Wages and benefits*

Supplier's employees must be provided with wages and benefits that, at a minimum, comply with national laws or industry standards whichever is higher, as well as binding collective agreements, including those pertaining to overtime work and other premium pay arrangements.

### **III. Quality, Health and Safety**

#### *Product Quality*

Supplier shall provide Delfort with high-quality products, ingredients and services that meet all applicable quality and food safety standards. Supplier must demonstrate that it has robust safety- and quality-management systems in place. Supplier shall immediately report to Delfort any concerns about product safety.

#### *Product Origin*

Supplier shall be capable to disclose all the potential sources of primary origins (country of origin) associated with deliveries made. Delfort reserves the right to ask the supplier to create, at a point of time, full supply chain mapping back to origin to facilitate assessment of upstream supply chain compliance.

#### *Workplace Environment*

Supplier is obliged to provide a safe and healthy working environment to prevent accidents and injuries. As a minimum, potable drinking water, adequate lighting, temperature control, ventilation, sanitation, and personal protective equipment must be provided together with adequately equipped work stations. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable laws and regulations.

#### *Housing Conditions & Respect of Privacy*

When provided by the Supplier, dormitory facilities shall be constructed and maintained in accordance with all applicable laws and regulations and they shall be clearly segregated from the factory and production area. When dormitory facilities are provided, they must be clean, safe, adequate, unrestricted and promote basic human dignity.

#### *Emergency preparedness*

Supplier shall be prepared for emergency situations. This includes worker notification and evacuation procedures, emergency training and drills, appropriate first aid supplies, appropriate fire detection and suppression equipment and adequate exit routes. Supplier shall regularly train employees on emergency planning, responsiveness as well as first aid and emergency medical care.

#### **IV. Environment and Sustainability**

Delfort requires its Supplier to comply with all applicable legal environmental requirements and demonstrate continual improvement of its environmental and sustainability performance.

##### *Environmental Permits and Reporting*

Supplier shall maintain at all times all required operational and environmental permits and it shall comply with all required environmental or operational reporting regulations (intakes, emissions, etc.).

##### *Environmental Management System*

Supplier shall document and implement a relevant environmental management system (based on international standards such as ISO 14001:2015), designed to identify, control and mitigate significant environmental impacts.

##### *Hazardous Materials and Product Safety*

Supplier shall identify hazardous materials, chemicals and substances, and ensure their safe handling, movement, storage, recycling, reuse and disposal. All the applicable laws and regulations related to hazardous materials, chemicals and substances must be strictly followed. Supplier must comply with material restrictions and product safety requirements set by applicable laws and regulations. Suppliers shall ensure that key employees are aware of and trained in product safety practices.

##### *Resource Consumption, Pollution Prevention and Waste minimization*

Supplier shall optimize its consumption of natural resources, including energy and water. Supplier shall implement and demonstrate sound measures to prevent pollution and minimize generation of solid waste, wastewater and air emissions. Prior to discharge or disposal, supplier shall characterize and treat wastewater and solid waste appropriately and according to applicable laws and regulations.

#### **V. Management Practices**

##### *Management Systems*

Delfort expects its Suppliers to have in place a management system to ensure compliance with applicable laws, regulations and Delfort's requirements relating to the suppliers operations, products and mitigation of operational risks. The management system shall facilitate continuous improvement and as a minimum include the following elements:

- (i) corporate social and environmental responsibility statements affirming supplier's commitment to compliance and continuous improvement;
- (ii) clearly identified company representative(s) responsible for ensuring implementation and periodic review of the status of the management systems;
- (iii) identification, monitoring and understanding of applicable laws, regulations and customer requirements;
- (iv) process to identify and control the environmental, health and safety and labor practice risks associated with supplier's operations; and
- (v) periodic self-evaluations to ensure conformity to legal and regulatory requirements, to the content of this Code and to customer contractual requirements related to social and environmental responsibility.

##### *Compliance Verification*

We expect Supplier to review their operations and the operations of their supply chain that provides goods and services to Delfort and verify compliance with this Supplier Code. Supplier will cooperate with

and allow Delfort or our authorized third party to conduct audits (including social accountability audits) to verify compliance.

*Record Keeping*

Supplier shall maintain all financial books, records and accounts in accordance with applicable regulations, laws and generally accepted accounting principles. This requirement includes data and documentation related to all payments made to government officials or entities, product traceability, food safety, employee safety, and any additional requirements, documents and records required by law, or requested by Delfort.

*Compliance Reporting*

Supplier shall provide a global Compliance Hotline as a safe and secure means for employees, customers and others to confidentially (and anonymously where permitted by local law) report their compliance concerns.

Supplier's Acknowledgement

We, the undersigned hereby confirm that:

- we have received and taken due note of the contents of the Delfort's Supplier Code of Conduct and shall comply with its stipulations;
- we shall oblige all our sub-suppliers to recognize and respect the requirements of Delfort's Supplier Code of Conduct.

Company Name:

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Represented by:

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Signature:

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Date:

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