



# CODE OF CONDUCT

THIS CODE OF CONDUCT IS BASED ON THE FUNDAMENTAL VALUES OF AGRANA. IT CONSTITUTES THE BASIS FOR ALL BUSINESS ACTIVITIES AND DECISIONS. THE CODE IS DESIGNED TO CONVEY A FUNDAMENTAL AND CLEAR UNDERSTANDING OF THE CONDUCT WE EXPECT FROM ALL OUR EMPLOYEES, MANAGING DIRECTORS, MANAGERS AND DIRECTORS IN ALL AREAS WHERE WE DO BUSINESS, AND FROM OUR BUSINESS PARTNERS WORLDWIDE.

We are committed to conduct our business operations in an ethical, legal and responsible manner, in the context of sustainability.

## **LEGAL COMPLIANCE**

AGRANA and all its employees worldwide must comply with all applicable legal requirements at national and international level and with the AGRANA standards pertaining to employment and manufacturing.

AGRANA products are manufactured to high standards of quality and product security, and shall meet the applicable regulations and specifications.

## **FAIR COMPETITION**

We are unconditionally committed to competition by fair means and in particular to compliance with competition and antitrust legislation. All employees shall comply with our antitrust law compliance guideline.

## **ANTI-CORRUPTION**

We tolerate neither corruption nor bribery. Our business relationships shall be based solely on the foundation of objective criteria. In addition to quality, reliability and competitive prices, these include consideration of social and environmental standards as well as the principles of good corporate governance.

Gifts and invitations must observe criteria such as economic efficiency, appropriateness and external image. Gratuities offered in accordance with local custom must under no circumstances exceed an appropriate value, or be seen or understood as bribery. Engagement in any illegal and illicit activities is prohibited, especially the acceptance of bribes, and may result in criminal prosecution. All employees shall comply with our local anti-corruption guidelines.

## **CONFLICTS OF INTEREST**

In addition, only objective criteria shall be applied in personnel decisions and business relationships to third parties.

In the course of business, employees may find themselves in situations in which their personal or economic interests are or could come into conflict with those of AGRANA. In such situations, the employees must act exclusively in the interest of AGRANA. Personnel decisions or business relations to third parties must be based solely on objective criteria. In the event of a conflict of interest, every employee is obliged to disclose any actual or potential conflicts of interest within the scope of the reporting system of the conflicts of interest guideline and to seek approval of the conclusion of the transaction. This shall also apply to situations that also give the mere impression that such a conflict could be created.

## **MONEY LAUNDERING AND BUSINESS PARTNER CHECK**

Money laundering shall not be tolerated. We carry out a risk-based review of the identity of existing and potential business partners. All employees shall comply with the requirements for import and export controls, and the applicable rules on preventing terrorist financing.

## **BUSINESS SECRETS AND INDUSTRIAL PROPERTY RIGHTS OF THIRD PARTIES**

Confidential information of any kind (e.g. applied technologies, intellectual property, business, financial, and accounting information, forecasts, business plans, investment projects) that are obtained in the course of professional activity may only be used exclusively in the interest of AGRANA and not used in pursuit of one's own personal interests nor in the interests of third parties. In addition, the industrial property rights of third parties must be respected.

## **DATA PROTECTION**

The protection of personal data is an important matter for us. We therefore take all the necessary precautions to ensure that data is collected, processed and utilised in a manner that is transparent, appropriate, comprehensible and careful. All employees shall comply with our AGRANA data protection guideline.

## **FINANCIAL REPORTING**

Business processes must be documented appropriately in the internal audit system. The full and correct collection of all the relevant accounting information shall be ensured by conducting appropriate audit procedures. AGRANA is committed to open and transparent financial reporting for the capital market using the international accounting standards.

## **CAPITAL MARKET**

As a listed company, AGRANA takes appropriate organisational measures to prevent insider trading and market abuse. All employees shall comply with our AGRANA capital market compliance guideline.

## **COMPENSATION AND BENEFIT**

Remuneration paid to employees shall meet all applicable laws and standards,<sup>1</sup> including those relating to minimum wages, overtime, and statutory benefits and paid vacations.

## **WORKING HOURS**

We comply with the applicable legal restrictions on working hours. The maximum permitted working hours per week are regulated by national law and in accordance with the conventions of the International Labour Organization (ILO). Overtime is restricted according to the contractual and statutory obligations. Employees are entitled to at least one day off each week, except for

<sup>1</sup> Recognised standards such as the Universal Declaration of Human Rights (UDHR) or the Conventions or the International Labour Organisation (ILO) were taken into consideration when drawing up this Code of Conduct.

exceptional circumstances and for a limited period of time. The ILO provides for the essential rest breaks, in order not to risk the safety and health of the employees.

#### **HEALTH & SAFETY AT THE WORKPLACE**

AGRANA shall make every effort to ensure that the workplace and its environment (machinery, equipment and processes, chemical agents, etc.) do not endanger the physical integrity or health of its employees. In addition, employees are given training related to health & safety at work. Employees must have guaranteed access to drinking water, sanitary facilities and social areas that are built and maintained in accordance with applicable statutory requirements. The workplace and its environment must provide suitable emergency exits, fire protection equipment and have adequate lighting. Adequate protection for non-smokers must also be provided.

#### **PROHIBITION OF CHILD, FORCED AND COMPULSORY LABOUR**

We do not accept employment of young persons aged under 15, unless permitted by law (and in no circumstances below age 14). In the event that applicable laws set a higher minimum age for employment or compulsory education ends above age 15, this age limit shall be considered valid. All young employees must be protected from performing any work that is in all likelihood hazardous or would be harmful to the young employee's physical or mental health, or interfere with his education and social, spiritual or moral development. We do not use forced or compulsory labour, meaning any work or service that is extracted from any person under the threat of any penalty for which said person has not offered himself voluntarily. Similarly, it is forbidden to retain personal identification documents from personnel upon commencement of employment.

#### **PROHIBITION OF DISCRIMINATION AND HARASSMENT**

All employees are expected to behave towards colleagues and third parties in a friendly, objective, fair, and respectful manner. Any form of discrimination and harassment will not be tolerated. We do not employ any discriminating practices. Discrimination means any distinction, exclusion or preference that limits equal treatment or access opportunities to employment or occupation, which may be based on colour, sex, sexual orientation, religion, political opinion, age, national, social or ethnic origin, family obligations or similar considerations of this kind.

#### **FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING**

AGRANA acknowledges and respects the rights of employees to freedom of association and their right to freely and independently choose their representatives, and guarantees that these representatives do not suffer any form of discrimination. The company also recognizes the right of the employees to collective bargaining.

#### **ENVIRONMENT AND SUSTAINABILITY**

We are aware of our responsibility to protect the environment and are committed to sustainable and ecological entrepreneurial activity. We make every effort to minimise the consumption of resources, including energy usage and emissions, water consumption and waste water, as well as solid waste and potential environmental impacts, in the supply chain. All procedures and standards have to meet or exceed the minimum legal requirements.

Land must be used in a manner compatible with the natural environment and landscape, and within the framework of the legislation for nature conservation, ownership and land use rights.

#### **RESPONSIBILITY FOR IMPLEMENTATION**

We are all responsible for compliance with the Code of Conduct and the relevant corporate policies. All managers must organise their areas in a such a way to guarantee compliance with the Code of Conduct, internal corporate guidelines and statutory requirements.

In line with their fiduciary duty, all employees must immediately report any violations of the Code of Conduct to their superiors via the standard internal AGRANA channel of communication. Furthermore, employees and external stakeholders can submit a report through the AGRANA whistleblowing system, in compliance with our AGRANA whistleblowing system guideline.