

# CODE OF CONDUCT OF THE INFAMILY FOODS GROUP



**InFamily**  
Foods

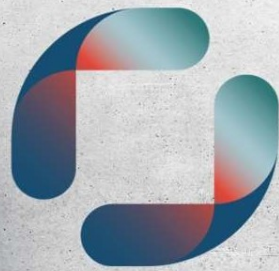
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# 1. INTRODUCTION



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Dr. Wolfgang Kühnl    Hans-Ewald Reinert

## 1.1. STATEMENT BY THE MANAGEMENT BOARD

Dear colleagues,

The two traditional family companies, Kemper and Reinert, have become one:  
**InFamily Foods!**

Under **InFamily Foods Holding**, we bundle our activities and create a neutral foundation on which we can further develop our three business pillars animal protein sources (The Family Butchers + Schinken-Einhaus), plant-based protein foods (The Plantly Butchers) and the systematic investigation and research of future protein sources (The Cultivated B) in a detached manner.

Family values, such as understanding and openness, and uncompromising reliability in food safety and product quality form the basis for our daily actions. We are aware of our corporate responsibility towards employees, customers, business partners, research institutions, cooperation partners, public institutions, society and the environment. Respect for and compliance with rights and laws in all regions and countries in which we operate is a matter of course for us and is non-negotiable.

We all try to do our best every day and to act ethically and correctly to the best of our knowledge and conscience. But in a world of constant change, this is not always easy.

Der **The Code of Conduct** is intended to support you in making the right decisions and to serve as a common guideline for all our actions. It describes our standards, convictions and behaviour, which are intended to create trust and reliability both within the group of companies and towards our business partners.

Disregarding or even violating our Code of Conduct is not compatible with our values and represents a risk for the entire group of companies, as such violations can have legal consequences and damage our reputation. For this reason, we ask each one of you not only to read the Code of Conduct, but also to live it.

If you are unsure or feel that you do not fully understand an issue or risk, please seek advice from the appropriate parties, such as your supervisor or the Risk & Compliance Department.

**Dr. Wolfgang Kühnl**

**Hans-Ewald Reinert**

## 1.2. OUR VALUES GUIDE US

### Teamwork & Sense of responsibility

Our employees are the foundation of our success. Their know-how, qualifications and motivation are our decisive competitive advantage. In our dealings with each other, we are guided by our core values of curiosity, respectful interaction and acceptance of responsibility. For this reason, we focus on ensuring the safety and health of our employees at work and preventing accidents and occupational illnesses.

### Reliability & Sustainability

**In**Family Foods stands for consistent compliance with the product characteristics agreed with the customer, uncompromising food safety and the highest reliability of our services. We strive for safe, cost-effective, environmentally friendly and (energy) efficient solutions for our products and their production.

### Understanding & Openness

To be able to offer a ready pallet of high-quality produced protein sources, a basic open attitude towards people, processes and technologies as well as a deep understanding of the needs of our consumers, the trade as well as the entire supply chain is essential.

## 2. RESPONSIBILITIES



## 2.1. YOUR RESPONSIBILITY

“Every single employee is important when it comes to ethical and correct behaviour in everyday working life! No matter what position and task someone holds. “

*Dr. Wolfgang Kühnl*

### Things you can do:

- ✓ Comply with applicable rights, laws and regulations. If standards from different countries contradict each other, follow the stricter rule.
- ✓ Familiarise yourself with our values, standards, policies, etc.
- ✓ Complete our Ethics & Compliance training easily online in your eLearning portal.
- ✓ If you find yourself in an uncertain situation, seek advice.
- ✓ Make sure that external business partners you work with know that we are committed to our Code of Conduct.
- ✓ Report violations and indications of the alleged existence of violations.

Of course, the Code of Conduct cannot provide the answer to all questions, situations or even conflicts.

But our Integrity Check questionnaire will help you:





**IS MY DECISION**  
or action legal and am I  
authorised to do it?



**DO I ADHERE**  
to the standards, guidelines  
and values of this Code?



**HAVE I**  
analysed and assessed  
potential risks?



**IS MY DECISION**  
free from personal interests  
and concerns?



**IF THIS DECISION**  
became public, would I still be of  
the opinion that I had acted  
correctly?

**If you can answer "yes" to all questions in good conscience, your decision or action is likely to be in line with our values, standards and guidelines.**

If in doubt, you can always contact your supervisor or the Compliance Department!  
Do not be afraid to ask questions openly and honestly or to ask for help.

“In especially, our leaders should set a good example and demonstrate moral, integrity and ethical behaviour in their role model function. “

*Hans-Ewald Reinert*

**Things you can do:**

- ✓ Create an open and trusting environment where concerns can be raised and discussed directly.
- ✓ Ask your staff if they have any questions about the Code of Conduct or if there is any ambiguity.
- ✓ Ensure compliance with the Code of Conduct within your department.
- ✓ Keep yourself informed about changes.

## 2.2. DEALING WITH VIOLATIONS

### Ask questions and report concerns!

If you are aware of any violations or indications of violations of the Code of Conduct, company policies and procedures or applicable laws and regulations, please contact one of the following persons/offices immediately:

- Your supervisor(s) or another manager you trust,
- the Risk & Compliance Department,
- the Human Resources Department.

### Are you questioning which facts or matters are to be reported?

We are pleased to provide you with the following examples as:

- Violations of the Code,
- circumstances that could affect the safety, quality or legality of our products,
- theft, misappropriation, fraud, etc.,
- conflicts of interest,
- health and safety in your workplace,
- bullying, harassment or discrimination,
- corruption or bribery, etc.

By reporting concerns early, InFamily Foods can identify a potential or actual breach at an early stage and initiate appropriate remedial action. Help to protect InFamily Foods from financial and reputational damage.

A Whistleblower procedure has been implemented specifically for this purpose. Within the framework of this procedure, you have the following options at any time:

- ✓ to report anonymously via the whistleblowing system [infamilyfoods.integrityline.com](https://infamilyfoods.integrityline.com)
- ✓ to contact us in writing by e-mail to [whistleblower@infamily-foods.com](mailto:whistleblower@infamily-foods.com)
- ✓ in writing by post to "Whistleblower" or the Compliance Department, or
- ✓ contact the Compliance Department by telephone.

Anyone who reports misconduct or possibly even concerns will not suffer any negative consequences! InFamily Foods prohibits any kind of reprisals against employees or even external third parties who have acted in good faith, even if the facts subsequently prove to be unfounded.

You are also free to disclose your identity or provide a tip anonymously. Please note that in any case your report will be treated in the strictest confidence and anonymously.

# 3. HUMANS & ENVIRONMENT



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## 3.1. HUMAN RIGHTS

**We respect the dignity of our employees, customers and business partners. In our actions, we always ensure that we act in accordance with UN human rights, recognised international labour and social standards (ILO) and the Ethical Trading Initiative Base Code (ETI).**

### Respectful treatment & fair working conditions

Respecting human rights and protecting health and safety in the workplace are an essential part of our social responsibility. InFamily Foods meets these obligations as follows:

- by complying with all applicable wage, working time and occupational health and safety laws as well as the General Act on Equal Treatment,
- by firmly anchoring the right to rest and regular paid leave,
- by respecting the rights to freedom of association and collective bargaining,
- by strictly rejecting child and forced labour!

#### Things you can do:

- ✓ Ensure that your work complies with the obligations listed above.
- ✓ If you become aware of potential human rights violations in the course of your work, report them immediately.

### General Act on Equal Treatment

**Discrimination on the grounds of race or ethnic origin, gender, religion or belief, disability, age or sexual identity is unacceptable to us and will not be tolerated under any circumstances.**

We have committed ourselves to the following rules to prevent discrimination:

- Job advertisements must always be formulated in a neutral and inviting way,
- Recruitment criteria are defined objectively in advance, whereby the prohibition of discrimination must be considered without exception,
- internal assessments, performance evaluations, salary increases, etc. are based on a transparent and comprehensible assessment concept,

- similarly, decisions regarding promotions, transfers or further training measures are made based on fair and verifiable criteria.

### **Things you can do:**

- ✓ Take note of our leaflet and related notices and publications on the intranet.
- ✓ Complete our e-Learning course on "Anti-discrimination and human rights".
- ✓ If you have any concerns or complaints, you can contact the Risk & Compliance department at any time.

## **Diversity & Equal opportunities**

**InFamily Foods** aims for an environment of trust and openness. Respectful treatment is essential in order to use the skills, background and talents of each employee to achieve success. We expect everyone to treat each other in a fair and appreciative manner and to respect the specific contributions of others, regardless of nationality, gender, origin, age, religion, disability, etc.

Furthermore, any personnel decisions are to be made free of personal feelings, preferences or prejudices. **InFamily Foods** promotes equal opportunities and equal treatment.

### **Things you can do:**

- ✓ Understand that no one should be discriminated because of nationality, gender, origin, age, religion, disability, etc., and that diversity is valuable.
- ✓ Complete our eLearning on "Anti-discrimination and human rights".
- ✓ Always make fair and objective decisions.
- ✓ Consider our policy on the employment of family members and in the case of personal relationships between employees.

## Bullying & Harassment

InFamily Foods does not tolerate any form of bullying, unlawful harassment or intimidating, humiliating behaviour. Please note here that even an indecent joke or comment can make your counterpart feel negatively. What is considered acceptable in one culture may not be the case in another.

### Things you can do:

- ✓ Always treat others with dignity by showing them respect and esteem.
- ✓ Complete our eLearning on “Anti-discrimination and human rights”.
- ✓ Refrain from words or actions that could be perceived by others as offensive, disrespectful or threatening.
- ✓ Do not tolerate humiliating, intimidating or disrespectful behaviour towards yourself or others.



## 3.2. HEALTH & SAFETY

### Safety in workplace

The safety and well-being of our employees and also business partners are of paramount interest to us. We attach great importance to continuous improvement in occupational health and safety to prevent accidents.

#### Things you can do:

- ✓ Adhere to the existing guidelines for your own protection.
- ✓ Attend regular training sessions.
- ✓ Report circumstances or incidents that could endanger workplace safety or health.

### Alcohol/drug abuse in the workplace

Alcohol, drugs or other chemical substances are strictly prohibited in the workplace as you are not only putting your own health at risk but also that of your colleagues.

#### Things you can do:

- ✓ Do not bring alcohol, drugs, etc. into your workplace.
- ✓ If you suffer from an addiction, get help. You can contact one of our addiction officers at any time.

### Health management

The health and sustainable promotion of the physical and mental well-being of our employees is very important to us.

For this reason, we employ company doctors at all our sites and offer various options around prevention and screening. Likewise, we do not see our activities in company integration management as an obligation, but rather as a personal concern.

### **Things you can do:**

- ✓ Take advantage of our preventive and precautionary services. For example, attend our annual fitness days or take advantage of our bicycle leasing offers.
- ✓ If you have physical or mental health problems, contact our company doctors.
- ✓ As a manager, make sure that your employees attend training courses and are informed about our offers.

### 3.3. ENVIRONMENT

**The protection and preservation of our environment and the efficient use of energy are particularly close to InFamily Foods heart.**

Investments in environmentally friendly products and technologies, as well as sustainable action, have a long tradition in our company. Our company history shows that it has never been a question of short-term success, but always acted with foresight to ensure the long-term existence of the company and its further development.

Our goal is to continue to use resources responsibly and sustainably. Therefore, we strive for safe, cost-effective, environmentally sound and efficient solutions for our products and their manufacture.

#### **Things you can do:**

- ✓ Follow our guidelines and work instructions.
- ✓ Complete our e-Learning on the topic of "Environmental and Energy Management".
- ✓ Support us in achieving our climate protection goals.
- ✓ Pay attention to environmentally friendly behaviour: Close doors and gates when leaving cold storage rooms, switch off conveyor belts during breaks and at the end of shifts, don't waste water unnecessarily, make sure to separate waste, refrain from unnecessary paper printouts, etc.

The sum of many small changes in our working behaviour makes it possible to constantly improve environmental protection at our sites and thus make an important contribution to InFamily Foods ecologically sustainable management.

## **4. BUSINESS PARTNERS AND THIRD PARTIES**



## 4.1. PRODUCT SAFETY

### Food safety

**InFamily Foods** stands for uncompromising food safety and maximum reliability. All processes in the company are geared towards constant quality. The individual locations are specialised and ensure by means of modern technical infrastructure that the competence of our employees contributes to the constant improvement of process safety. Our food safety systems with strict hygiene regulations guarantee safe consumption. For us, food safety culture means that we take pride in always doing our job right.

### Quality control

The first step to the highest quality begins with the careful selection of ingredients. We have a deep understanding of the entire supply chain. We always know where the product we are processing comes from, because our first-class raw materials only come from tested and certified suppliers. Regular chemical and microbiological checks from the meat to the finished sausage ensure the quality we are used to. With examinations by in-house and independent laboratories as well as process controls, we guarantee compliance with the highest product standards.

### Certifications

**InFamily Foods** sets the highest standards for itself. For this reason, we have integrated a comprehensive quality management system throughout the entire group of companies. For many years, we have thus also fulfilled the high requirements of numerous certification standards, such as the IFS Food Standard, the BRC Food Safety Standard and the QS system, which are confirmed by regular and independent audits.

With our continuous improvement management, we are committed to applying the knowledge and experience of our employees in a structured way to improve our processes.

## Things you can do:

- ✓ Follow our company policy and work instructions.
- ✓ Complete our annual hygiene training.
- ✓ Participate regularly in our "field"-meetings and make suggestions to further improve the company's performance around food and occupational safety.
- ✓ Immediately report circumstances that could affect the safety, quality and legality of our products to your supervisor and visibly block the affected product.
- ✓ If you have any questions about food safety, you can contact Quality Management at any time.

## 4.2. RESEARCH

**We apply the highest possible quality standards to our research work, just as we do to product safety. As best practice, we follow the guidelines of the German Research Association. Our research studies are always methodical, systematic and open-ended, with clearly defined questions. Insofar as we publish research results, our research approaches, methodology and the resulting findings are always comprehensible and verifiable.**

### **Things you can do:**

- ✓ Adhere to existing guidelines and work instructions to meet our quality standards in research and development.
- ✓ Information such as research results is the intellectual and confidential property of the company and must be protected. Do not publish information on your own.

## 4.3. ANTI-CORRUPTION & ANTI-BRIBERY

**InFamily Foods prohibits all forms of corruption and bribery. We do not accept gratuities with the intention of influencing business decisions or gaining a personal advantage.**

### Bribery

The term bribery is understood to mean offering, promising or giving something of value in order to obtain or maintain a business advantage or even a business deal.

### Kickbacks

Are sums of money expended by the giver to induce a third party to behave in a certain way or to show gratitude for certain behaviour.

### Things you can do:

- ✓ You must not offer, request or accept payments, gifts or other favours in return for a preferential act.
- ✓ Complete our eLearning on “Anti-corruption”.
- ✓ Report corrupt behaviour if you become aware of it.



## 4.4. CONFLICTS OF INTEREST

**A conflict of interest can arise if personal relationships or shareholdings in other companies have an influence on your business decisions at InFamily Foods or it could appear to others that this is the case.**

Personal relationships that could possibly lead to a conflict of interest are, for example, family relationships, partnerships or even close friendships with business partners and competitors.

If you feel confronted with a potential, alleged or actual conflict of interest, you must protect both your own and InFamily Foods reputation by raising the matter with your direct supervisor or the Risk & Compliance Department. Together, it can be verified whether a conflict of interest actually exists and what steps can be taken to resolve it.

### **Things you can do:**

- ✓ Make decisions based solely on objective criteria and not on personal concerns.
- ✓ Complete our eLearning on “Compliance Fundamentals”.

## 4.5. INTERACTION WITH HOLDERS OF PUBLIC OFFICE

**As InFamily Foods international is in constant contact and exchange with state institutions and their employees, we expect that our employees will not do anything that could be interpreted as an attempt to influence the decisions of a state agency or its representatives in any way.**

For this reason, it is prohibited to offer gifts, hospitality, benefits or the like to holders of public office or even employees of a public institution.

If a public office holder or also an employee of a public institution approaches you with an expectation to this effect, this must be reported immediately to one of the contact persons/offices listed in chapter 2.2.

### **Things you can do:**

- ✓ Refrain from giving gifts, invitations or other benefits to employees of a public office.
- ✓ If, in the course of your work, you become aware of gifts, money, gratuities, etc. given to an employee of a public office, report this immediately.
- ✓ Report public officials who approach you with dubious expectations.

## 4.6. FAIR COMPETITION

**As an internationally operating group of companies, we are in a constant state of competition. Free and fair competition as well as compliance with competition and antitrust laws that protect it are essential for us.**

We also ensure that our business with third parties does not violate economic embargoes, trade regulations or import and export control requirements. We only do business with individuals or companies that have not been sanctioned and are willing to comply with relevant obligations.

### Fair dealing with costumers

InFamily Foods values and respects its customers, which is why ethically correct, legally compliant and fair dealings are important to us. Our information and statements about products are always honest and fact-based. We would never intentionally mislead existing or potential customers.

### Fairer dealing with suppliers

Our suppliers and their quality standards are of the utmost importance to us, so we place the highest value on doing business with companies that comply with our principles and act in accordance with the law. The selection of our suppliers is always based on objective criteria and never on personal interests or relationships.

### Avoidance of inappropriate behaviour

InFamily Foods expects its employees, without exception, to do their part to avoid and combat illegal business practices. This includes, among other things, price fixing, bid rigging, sharing of markets, territories and customers or concerted action in tenders.

Please note here that oral agreements also constitute a violation of competition/antitrust law.

## Things you can do:

- ✓ Read and internalise our guide on antitrust law. It contains many practical examples to help you gain a solid understanding of unlawful business practices.
- ✓ Complete our eLearning on “Competition and antitrust law”.
- ✓ Be on the alert, especially at industry meetings, association work or similar events. If there is any collusion or other improper activity, leave the room immediately and ensure that your absence is appropriately documented. Report the incident to the Risk & Compliance Department as soon as possible.

## 4.7. ANTI MONEY LAUNDERING

**„Money laundering is the smuggling of illegally generated funds into the legal financial and economic cycle.“**

*Federal Ministry of the Interior, for Construction and Home Affairs*

**InFamily Foods** strictly rejects transactions with money that has been criminally acquired, e.g., from fraud, terrorism, drug trafficking, etc. We support and observe the laws on money laundering. We support and observe the laws on the prevention of money laundering and terrorism. As every business is at risk of being misused for money laundering, we must all be always mindful and alert.

### **Things you can do:**

- ✓ Be mindful. Indications of funds of criminal origin may include incoming payments from third parties who are not recognisably involved in the hand of the law relationship, large cash payments or even incomplete and incorrect contact information of a business partner.
- ✓ Follow our anti-money laundering and tax anti-evasion policy.
- ✓ If you come across a business process or transaction where something seems to be wrong, report it immediately to the Risk & Compliance department.

# 5. INFORMATION AND COMMUNICATION



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## 5.1. ACCOUNTING AND REPORTING

**Because the correctness and accuracy of our books and records and the accompanying financial reporting are the starting point for our decision-making processes, we place the highest value on propriety.**

Our books and records must accurately always reflect the financial situation of the company. For this reason, all employees must ensure that records and information are complete and accurate. Knowingly falsifying or misappropriating information or transactions is prohibited.

Likewise, care must be taken to ensure that business records are kept in accordance with legal retention periods.

### **Things you can do:**

- ✓ Comply with the applicable legal requirements for proper accounting.
- ✓ Try to avoid errors and, if significant errors have occurred, report them immediately to your supervisor.

## 5.2. DATA PRIVACY & PROTECTION

**InFamily Foods respects the personal rights of its employees and business partners. For this reason, the collection, storage, processing and transfer of personal data is always carried out with the greatest care and in compliance with applicable laws and regulations.**

### **Things you can do:**

- ✓ Observe existing guidelines and work instructions.
- ✓ Complete our eLearning on the topic of "Data Protection".
- ✓ Do not disclose personal data without legal permission.
- ✓ If you are unsure whether you are allowed to process personal data, you can always contact our data protection manager or data protection officer.
- ✓ Ensure that personal data is destroyed when it is no longer needed.



## 5.3. CORPORATE PROPERTY PROTECTION

**We are all required to ensure the protection and proper use of InFamily Foods' corporate property to avoid loss, theft, unauthorised use, etc.**

In addition to the proper handling of physical assets, such as inventory, equipment, company vehicles and financial resources, we also need to take care of intangible assets. These include confidential information and trade secrets, copyrights, trademark and patent rights, customer lists and agreements, etc.

### **Things you can do:**

- ✓ Handle physical company property responsibly.
- ✓ Always respect labour law and contractual agreements regarding your confidentiality obligations.
- ✓ Identify sensitive information and records and ensure appropriate access restrictions are in place.
- ✓ Always dispose of company information properly.
- ✓ If you discover that InFamily Foods physical or intellectual property is being violated or misused, for example by passing on information or documents to unauthorised third parties, you are obliged to report this immediately.

## 5.4. INFORMATION TECHNOLOGY AND SECURITY

**In everyday business, technological resources such as laptops, tablet PCs, smartphones and software are essential. IT systems are used, and data is processed on a regular basis.**

For this reason, everyone is obliged to take responsibility for the protection of these resources in order to avoid and prevent damage, loss or even unauthorised access. Since digital information is quickly duplicated, disseminated and subsequently almost indestructible, we place the highest priority on securing our IT infrastructure, appropriate security standards and effective protective measures to protect our employees and our business partners.

### **Things you can do:**

- ✓ Observe the existing security policy and associated work instructions.
- ✓ Always be careful when you receive e-mails from senders you do not know. Often these emails contain malicious attachments with malware or are designed to trick you into revealing relevant company information.
- ✓ Complete our eLearning on the topic of "Information Security".
- ✓ Take the time to read warning messages regarding current tricks and scams used by fraudsters, such as the "CEO/Vice President Fraud" scam.

## 5.5. SOCIAL MEDIA

**Respect, tolerance and honesty towards our employees, business partners and the public are a matter of course for us when dealing with social media.**

Social media offer a great communication platform to share information globally and in a timely manner. However, everyone must be aware of his or her responsibility for InFamily Foods reputation. The release or misuse of confidential or sensitive information is strictly prohibited.

### **Things you can do:**

- ✓ Do not publish information about InFamily Foods business activities unless you are authorised to do so.
- ✓ Publications relating to customers, business partners or suppliers must only be made with the permission of both parties.
- ✓ Information or documents published on our internal communication platforms are fundamentally not intended for third parties and may not be shared independently on public social media without consent.
- ✓ Complete our eLearning on “Compliance Fundamentals”.