



# CODE OF CONDUCT

## OF THE ORIOR GROUP

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This Code of Conduct was approved by the Board of Directors and the Executive Committee of ORIOR AG in April 2021.

**This Code of Conduct outlines the most important common values and rules of conduct that we follow and exemplify as employees of the ORIOR Group. They reflect our understanding of responsible conduct in every relationship, and we adhere to them consistently at all times, both within the ORIOR companies and in our external interactions with business partners.**

## **1. Principles and objectives**

A holistic approach is very important to us. Economic, ecological and social components are given equal consideration and improved continuously. “We are ORIOR” is based on core corporate values, open and direct communication, ethical and respectful behaviour, and the fostering of responsibility at all levels. The primary goal of ORIOR is to continuously create added value for all stakeholders. The basis for achieving this is the conscientious management of our companies while assuming responsibility along the entire value chain, taking into account the interests of all our stakeholder groups, and aligning our activities with sustainability principles.

Our decentralised business model allows the individual ORIOR companies to live out their own culture and identity tailored to their employees and customers, as well as create original product, brand and concept worlds. The accompanying quality and safety standards that we apply to our products and services are uncompromising. ORIOR prides itself on the cultural richness in each of its competence centres, promotes diversity and commitment, supports lifelong learning and development, offers an attractive working environment, and ensures occupational safety.

All employees of the ORIOR Group act in an entrepreneurial manner, behave respectfully and ethically towards their fellow human beings, and comply with local legislation as well as internal guidelines and the principles and rules of conduct described below. Their good example also has a positive influence on the behaviour of work colleagues and business partners. Honest, correct and respectful interactions between employees as well as with our business partners, shareholders, investors and all other stakeholders are an integral part of our corporate culture.

Our business partners, consumers and shareholders are encouraged to support us in the implementation of this Code of Conduct, to endorse the rules of conduct and values it contains and thereby further strengthen collaboration and exchange.

## **2. Quality standard**

The ORIOR Group competence centres manufacture premium-quality products. The accompanying quality and safety standards that we apply to our products and services are uncompromising and equally fulfil the highest quality requirements of both our customers and consumers. To ensure this,

we employ systematic quality management that usually exceeds the legal requirements. All of our competence centres have clearly defined quality assurance processes. Regular internal and external audits are conducted to ensure appropriate compliance. All ORIOR Group production sites have a food safety certification recognised by GFSI (“Global Food Safety Initiative”), e.g. FSSC, ISO 22000 or “International Food Standard” (IFS), meaning that 100% of ORIOR products come from certified manufacturing.

### **3. Responsibility towards people and the environment**

#### **3.1 Human rights**

We uphold the principles of the Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation (ILO) and strive to fully embrace and act in accordance with the United Nations Guiding Principles on Business and Human Rights. Respect for the human rights of our employees, suppliers and other indirect stakeholders is an integral part of our corporate culture. We reject all forms of human rights violations, in particular child, forced and compulsory labour. We are committed to protecting and safeguarding the human rights of our employees at all times. All of our employees have a responsibility to respect the rights of their fellow human beings and to address human rights violations with their actions.

#### **3.2 The environment**

At ORIOR, sustainability is the basis and prerequisite for Excellence in Food. The respectful handling of resources and the environment is one of ORIOR’s stated corporate goals. In accordance with our sustainability strategy, we concentrate on the fields of activity that are the most critical for us, namely “Food waste and packaging”, “Climate and energy” and “Water”. We can, want and must make a positive contribution within these fields of activity. We set ourselves clear goals, regularly review our status in achieving them, define appropriate steps of action, and measure ourselves by our progress. Profitability and the lowest possible environmental footprint are not a contradiction in terms, but rather are increasingly becoming a prerequisite for the future viability of our company as well as a critical success factor in our business activities.

All ORIOR employees know that sustainability is a fundamental pillar of our activities. Through resource-efficient behaviour and compliance with both legal and internal environmental guidelines, all our employees assume the shared responsibility of positively influencing our environmental footprint with their actions. At the same time, we strive to make an increasingly positive proactive contribution in the upstream and downstream stages of the value chain. Clearly defined core values and rules, which we also uphold outside the company, are part of this goal. This also involves regularly reviewing environmental risks along the entire supply chain and proactively addressing issues and calling for improvements from our business partners.

## **4. Safe and respectful working environment**

### **4.1 Employees**

Employees who celebrate their craft with enthusiasm and pride while embodying entrepreneurship, ethics and respect at all times and in everything they do are crucial to ORIOR's success. We are committed to providing a respectful and non-discriminatory working environment and fostering the development of our employees. To achieve this, we take into account the different employee needs by allowing flexible working hours and part-time work whenever possible without having it affect employees' existing employment conditions in any way. Our corporate values in relation to our employees and work culture are firmly embedded in the "We are ORIOR" strategic pillar. All of our employees are familiar with these core values and apply the principles they contain in terms of their own attitude, actions and dealings with others.

### **4.2 Equal opportunity**

The diverse backgrounds, experience and skills of our employees are essential to our success. We do not tolerate any form of discrimination, bullying, harassment or disrespect in the workplace based on gender, age, nationality, race, sexual orienta-

tion, disability, political opinion or any other relevant personal characteristic. We are committed to equality and fairness and ensuring that all employees interact and work together in a respectful manner free from prejudice. Any form of verbal, physical or visual harassment will not be tolerated and is considered a violation of this Code of Conduct. All of our business units, including recruitment and employee development, are subject to the stated principles of equal opportunity.

### **4.3 Occupational safety and health**

We promote a safe and healthy working environment and invest in appropriate preventive measures. Occupational safety and health protection are joint responsibilities. We foster them by promoting conscientious behaviour and providing the best possible and effective organisational structures, regular information, and employee training and development. Our concept for "Occupational Safety and Health" (OSH) strengthens our safety and prevention culture at all corporate levels. We assume our responsibility for safety and health all along the supply chain by using our influence to communicate standards and enforce compliance wherever possible. For their part, employees do their utmost to safeguard their own health and that of their colleagues and third parties. Regulations issued by supervisors, safety officers and internal health management teams, as well as those contained in the framework of the hygiene concept, are complied with conscientiously and comprehensively.

#### **4.4 Employee representation**

Our employees are free to form and join employee representative bodies or engage in collective bargaining to protect their own interests. We actively respect and communicate the right of our employees and supply-chain business partners to freedom of association and collective bargaining in accordance with the respective regional or national laws. We are open and ready to listen and exchange ideas about the activities and concerns expressed by such associations. No employee or staff member may be discriminated against, intimidated or restricted in their working environment because of their involvement in such activities.

## **5. Ethical business conduct**

#### **5.1 Compliance with laws, rules and guidelines**

All applicable and relevant laws and regulations, in particular regarding product quality, food safety, environmental standards, occupational safety and health, as well as antitrust and competition laws and all labour laws, must be complied with without exception. Likewise, all ORIOR employees undertake to comply with our internal policies, directives and guidelines, of which this Code of Conduct is a part. Internal awareness-raising measures are initiated on a regular basis in order to ensure the best possible understanding of and compliance with the different laws, rules and guidelines.

ORIOR's reporting complies with the relevant legislation and regulatory requirements, and in particular the financial and non-financial reporting standards of accuracy, validity, reliability, timeliness, relevance and completeness.

#### **5.2 Due diligence, confidentiality and insider information**

All of our employees maintain strict confidentiality about any and all internal matters that have not been disclosed to the public. They must protect this ORIOR asset from damage and unauthorised access by third parties. This includes such things as trade and manufacturing secrets, intellectual property, know-how and business figures. As a listed company, ORIOR and all its employees with access to relevant information are subject to insider trading laws and regulations. Trading in ORIOR shares on the basis of advance knowledge or confidential information affecting ORIOR's share price is not permitted. These requirements also apply to the handling of information from other companies, such as that acquired from negotiations with them. The disclosure of such information to third parties before it has been made available to the public is also prohibited. If employees possess knowledge of facts relevant to the share price which could lead to a change in the value of ORIOR Group shares and which, to their knowledge ORIOR's management is not aware of, they are obliged to disclose this information to the management or their direct superior(s). In cases of doubt, a report must be made to the ORIOR Group CFO or the Head of Investor Relations.

Violations of these regulations may have consequences under both commercial and criminal law.

### **5.3 Conflicts of interest**

All of our business activities must be conducted in the best interests of ORIOR. Conflicts between the personal interests of employees or involved third parties and the interests of ORIOR must be avoided. When making business decisions, all employees must behave objectively and act in such a way as to help prevent conflict situations. Should a conflict of interest nevertheless arise, we must disclose it internally and immediately initiate measures to resolve the conflict. If a conflict of interest cannot be avoided in a specific case, we have to take appropriate measures to ensure that it does not have an adverse effect on ORIOR.

### **5.4 Competition and corruption**

We support open markets and fair competition in accordance with applicable competition and antitrust law. Business partners are selected under fair and equal conditions using objective criteria such as experience, price, quality, services, reliability and integrity. We expressly distance ourselves from anti-competitive business activities such as participation in cartels, price fixing, or unauthorised mergers and acquisitions. Under no circumstances will we use our market position unlawfully for our own benefit.

We condemn all forms of bribery and corruption, including extortion and facilitating payments. Em-

ployees at all levels are prohibited from directly or indirectly offering, granting or accepting unauthorised and/or disproportionate financial benefits (e.g. “bribes” or “kickbacks”) to or from others (e.g. business partners, private individuals, public bodies or institutions) in connection with business activities. This applies in particular when such actions influence the business judgement of the parties involved or if there is or could be a conflict of interests. Offering donations in any form to public bodies and employees, demanding gratuities of any kind, and accepting or distributing cash are all strictly forbidden.

Gifts, favours or gratuities may only be accepted if they do not exceed a reasonable limit or if business policy prevents the refusal thereof. The corresponding details and binding rules are outlined in our internal guidelines on company policy on donations and gifts. Supervisors must be consulted in the event of any uncertainty in this regard.

### **5.5 Donations and political contributions**

ORIOR and its subsidiaries contribute to social and community life by making donations to charitable, social, cultural, sporting and scientific causes as is customary within a business context. Participation in political discussions on issues affecting ORIOR takes place primarily through memberships in relevant associations and groups. ORIOR does not donate funds or non-cash assets directly or indirectly to political parties, candidates, office holders or party-affiliated foundations.

## **6. Responsibilities, violations and sanctions, reporting and complaints**

Compliance with this Code of Conduct is part of the contractual obligations of all our employees. Any type of violation damages the integrity and credibility of the ORIOR Group. Incidents which, in the opinion of the individual employee, indicate a breach of the law, regulations, internal guidelines or this Code of Conduct must be reported. The report can be made either internally to the direct superior(s), to the HR office of the relevant unit, to the CFO of the ORIOR Group, or anonymously to an external, independent reporting line in accordance with the internal “Complaints and reporting” policy. All information and documents submitted are treated confidentially, and the anonymity of the person(s) making the report is assured at all times. This process must not prejudice the person(s) making the report. This does not apply to violations committed by the person(s) making the report themselves, although any violations must be assessed, taking into account the degree of severity, the employee’s proactive reporting, and within the context of legal frameworks.

In addition to issuing this Code of Conduct and drafting further internal guidelines and regular awareness-raising measures, the “internal auditors” also check for evidence of misconduct as part of their periodic audits.

The Executive Committee decides on disciplinary action and/or contractual consequences, whereas the Board of Directors of the ORIOR Group intervenes in particularly serious cases or if members of management are affected.

If employees or business partners feel that their rights have been violated, they can also use the channels described in the “Complaints and reporting” policy to report incidents. ORIOR undertakes to investigate all reported cases and address violations.