



CODE OF CONDUCT

Responsibility in the supply chain and the associated due diligence, social standards for business partners

PHW Group

Status: 03.03.2025

Foreword

The PHW Group not only bears social and economic responsibility for all its employees but is also aware of its responsibility towards its agricultural partnerships. The family business in the third generation looks back on a 90-year history and has developed over time into a significant food company in Europe. In Germany, the group is number one in the poultry sector. The current business model is based on three business areas: poultry, alternative protein sources, and health. The PHW Group stands for the nutrition mix of the future and acts carefully for future generations by advocating for high-quality animal and plant protein products and their (further) development, as well as consistently promoting the circular economy concept in its economic activities since its foundation. The family business pursues high social standards in all three business areas and ensures the implementation of social minimum standards and compliance with human rights and environmental regulations in its business relationships.

This Code of Conduct defines expectations and principles towards business partners in connection with the production and delivery of goods as well as the provision of services worldwide, which also apply to PHW Group itself (hereinafter referred to as "expectations and principles"). It replaces the previous versions of PHW Group's Code of Conduct.

The expectations and principles set out in this Code of Conduct are based on applicable national laws, the legal requirements of the European Union, and consist of globally recognized social and environmental standards such as the conventions of the International Labour Organization (ILO), the UN Declaration of Human Rights, the UN conventions on the rights of children and the elimination of all forms of discrimination against women, the UN Global Compact, and the OECD guidelines for multinational enterprises, which also flow into the BSCI Code of Conduct.

A violation of this Code of Conduct may be a reason for PHW Group to reassess the business relationships, including all associated contracts, and as a last consequence, to terminate them.

Visbek, 03.03.2025

Peter Wesjohann

Chairman of the board of PHW Group

1. Scope

This Code of Conduct applies to all existing and future contractual services of the business partner to a company of the PHW Group.

2. Corporate Due Diligence

Compliance with legal regulations

The business partner conducts business in compliance with national and international legal regulations and laws, the legal requirements of the European Union, and globally recognized social and environmental standards as laid down in the United Nations Guiding Principles on the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the core labor standards of the International Labour Organization (ILO). The business partner informs itself about the current legal situation and implements changes in laws and new laws promptly if necessary. The regulation that currently imposes the strictest requirements shall always apply. This is the essential principle for economically responsible business activities.

Audits

The business partner agrees that compliance with the human rights and environmental expectations and principles and the obligations resulting from this Code of Conduct can be appropriately monitored at any time either by PHW Group itself or by an independent auditor commissioned by PHW Group.

The business partner agrees that such audits can be conducted annually or risk-based at any time to review compliance with the Code of Conduct at the business partner's operational and production sites during regular business hours and with reasonable notice.

Information obligations

The business partner will inform PHW Group in writing on an occasion-related basis and/or upon request about the implementation of its obligations under this Code of Conduct. The business partner has to inform PHW Group in writing immediately upon becoming aware of significant incidents, particularly violations, substantiated suspicions, and difficulties in complying with this Code of Conduct and addressing the expectations and principles of PHW Group in the business relationship as well as in the supply chain. This can also be done openly or anonymously through the complaint and whistleblower channels established by PHW Group. The legitimate interests of the parties and the rights of its employees, particularly data protection and the protection of trade secrets, shall be respected in the communication.

The business partner has to promptly provide PHW Group with all necessary information required by PHW Group to review compliance with the expectations and principles in the

business relationship and along the supply chain. The PHW Group will appropriately consider the legitimate business interests of the business partner and data protection aspects.

Cooperation obligations

The PHW Group will conduct annual and occasion-related risk analyses concerning the business partner in accordance with its legal obligation under the Supply Chain Due Diligence Act ("LkSG"). The business partner agrees to adequately support PHW Group in this regard if necessary.

If additional human rights or environmental expectations arise for the business partner due to a newly identified risk situation or an increased risk to achieve the protection purpose of the LkSG, PHW Group will inform the business partner in writing. The business partner must then fulfill the additional expectations and principles within a reasonable period from receipt of the notification and demonstrate their implementation to PHW Group.

Assistance with remedial measures

If the business partner violates the human rights and environmental expectations and principles within the meaning of this Code of Conduct, PHW Group will set a reasonable deadline for the business partner to end the violation or – if this is not possible for the business partner – to minimize it through appropriate measures and comply with the regulations of this Code of Conduct (hereinafter referred to as "remedy"). If a remedy is not possible within a foreseeable time, the business partner shall notify PHW Group and jointly develop a concept, including a timeline, to end or minimize the violation. The business partner is obliged to take all necessary cooperation actions in a timely manner to ensure effective remedy and implementation of the concept.

Suspension and termination of the business relationship

If the business partner does not comply with the human rights and environmental expectations and principles of PHW Group and violates a protected legal position or environmental obligation listed in this Code of Conduct, PHW Group is entitled to suspend the business relationship with the business partner during efforts to minimize or end the risk.

The PHW Group is also entitled to terminate all agreements between the parties and the respective affected individual orders in whole or in part with a notice period of two weeks, particularly if (i) the violation of a protected legal position or an environmental obligation is considered severe, (ii) the required remedy has not been implemented or not fully implemented after a deadline set for this purpose has expired, and (iii) no milder measures are available. A severe violation is also assumed if significant damage is imminent to the affected party or the environment due to the violation. A statutory right to extraordinary termination remains unaffected, as does the right to compensation.

Risk-based rights and obligations

If PHW Group identifies a human rights or environmental risk within the meaning of § 2 LkSG in connection with the business partner's contractual performance to PHW Group during its risk analysis or otherwise, the following regulations on "the obligation to pass on in the supply chain" and "training and further education" shall apply.

Obligation to pass on in the supply chain

The business partner shall oblige its direct suppliers, who indirectly provide services for PHW Group in connection with their contractual services for the business partner, to comply with the human rights and environmental expectations and principles of PHW Group according to this Code of Conduct. Furthermore, the business partner will ensure through appropriate contractual agreements with its direct suppliers that they address the human rights and environmental expectations and principles of PHW Group to their suppliers to the same extent as the business partner in relation to PHW Group and pass on this obligation appropriately along the supply chain.

Training and further education

If PHW Group identifies a human rights or environmental risk within the meaning of § 2 LkSG in connection with the business partner's contractual performance during its risk analysis, the business partner will conduct training and further education for its employees and its direct suppliers in agreement with PHW Group to enforce the business partner's contractual assurances. If the business partner does not fulfill this obligation or does not do so adequately, PHW Group is entitled to conduct these training and further education sessions at the business partner and – as far as possible – at its business partners itself or through an external service provider. The business partner will enable PHW Group or the commissioned third party to conduct the training to an appropriate extent. The business partner is obliged to bear the costs and will adequately cooperate in the implementation.

Indirect suppliers

If PHW Group has actual indications that a human rights or environmental obligation is being violated by an indirect supplier of the business partner, the business partner agrees to support PHW Group in establishing appropriate preventive measures against the perpetrator.

3. Corporate Responsibility Regarding Human Rights

Respect for human rights

The business partner commits to respecting human rights according to the "Universal Declaration of Human Rights" of the United Nations and respects and supports the principles of the "United Nations Global Compact". These require companies to recognize, support, and implement a catalogue of fundamental values within their sphere of influence.

Prohibition of forced labor, slavery, and disciplinary measures

Any form of forced labor is prohibited, for example, enforced by the deposit of a bond or the withholding of identity documents from employees at the beginning of the employment relationship. Also prohibited are any forms of slave labor, prison labor, or comparable work that violates fundamental human rights. All work shall be voluntary and without the threat of punishment. Employees must be able to terminate the employment relationship at any time. The use of physical punishment as well as psychological or physical coercion is prohibited. Verbal abuse, sexual and personal harassment, and humiliation must not occur.

Prohibition of child labor

Child labor must not be used. Any form of exploitation of children is prohibited. The business partner is urged to adhere to the recommendations from the ILO conventions on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which compulsory schooling ends according to the law of the place of employment and in any case not under 15 years. The rights of young workers must be protected: Under 18 years, they shall not be employed for work that is harmful to the health, safety, or morality of children. Special protective regulations must be observed.

Occupational safety and health protection

The laws, regulations, and standards on occupational safety and health protection applicable at the place of employment are complied with. The business partner is obliged to provide its employees with a safe and healthy working environment. Clear rules and procedures shall be established and followed to ensure health and safety at the workplace, particularly regarding the provision and use of personal protective equipment, clean toilets, and access to drinking water. Excessive physical or mental fatigue must be prevented through appropriate measures. In addition, employees are regularly informed and trained about applicable health protection and safety standards and measures.

Working hours

The laws and industry standards on working hours applicable at the place of employment must be complied with. The maximum permissible weekly working hours according to national legislation apply, but 48 hours shall not be regularly exceeded. No more than twelve overtime hours may be worked per week. Additional overtime is only permissible if it is required for short-

term operational reasons and is allowed by a collective agreement. Overtime must only be worked voluntarily and must be paid separately. Every employee has the right to at least one day off after six consecutive working days. More consecutive working days are only permissible if allowed by national law and a collective agreement.

Adequate wages

The remuneration for regular working hours and overtime must correspond to the statutory minimum wage applicable at the place of employment or the industry-specific minimum standards, whichever amount is higher. Employees must be granted all legally required benefits. Wage deductions as disciplinary measures are not permitted.

Freedom of association

The right of employees to form organizations of their choice, join them, conduct collective bargaining, and strike must be respected. In cases where freedom of association and the right to collective bargaining are legally restricted, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be provided. Their representatives must be protected from discrimination. Discrimination based on the formation, joining, or membership in such an organization is not allowed.

Representatives of employees shall be granted free access to the workplaces of their members to ensure that they can exercise their rights in a lawful and peaceful manner.

Equal treatment, anti-discrimination, and equal opportunities

Discrimination and unequal treatment of employees of the business partner in any form are not allowed, as long as they are not based on the requirements of the employment. This applies, for example, to disadvantages based on gender, race, ethnic or social origin, skin colour, disability, health status, political opinion, membership in employee organizations including trade unions, belief, religion, age, pregnancy, sexual orientation, or other personal characteristics.

The PHW Group advocates for gender equality and equal opportunities for men and women in its supply chains. In this context, PHW Group supports the principles for the empowerment of women in the company - implementation of the Women's Empowerment Principles (WEPs) - and the occupational safety regulations during pregnancy and maternity protection - ILO Convention No. 183 - and encourages the business partner to review and implement these requirements in its company.

The personal dignity, privacy, and personal rights of each individual are respected by the business partner.

Prohibition of unlawful eviction

The business partner respects the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests, and waters when acquiring, developing, or otherwise using land, forests, and waters whose use secures the livelihood of a person.

Prohibition of negative environmental impacts on human livelihoods

The business partner respects the prohibition of causing harmful soil changes, water pollution, air pollution, harmful noise emissions, or excessive water consumption that significantly impair the natural foundations for the preservation and production of food, deny a person access to clean drinking water, make it difficult or destroy a person's access to sanitation facilities, or harm a person's health.

Prohibition of commissioning or using private or public security forces for unlawful purposes

The business partner respects the prohibition of commissioning private or public security forces if, due to lack of instruction or control in the use of the security company, the prohibition of torture is disregarded, life or limb is injured, or the freedom of association and coalition is impaired.

4. Corporate Responsibility Regarding the Environment

Environmental protection laws and environmental permits

The business partner complies with the applicable environmental protection laws and environmental regulations, particularly regarding lawful waste management, the handling of chemicals and other hazardous substances, and their disposal, as well as for emissions and wastewater treatment. The business partner ensures that all required environmental permits are in place, kept up to date, and implemented in its company.

Handling of waste and hazardous substances, product safety

In particular, the business partner respects the prohibition of the production and use of chemicals, the prohibition of non-environmentally friendly handling, collection, storage, and disposal of waste according to the POPs Convention. The prohibitions on the export of hazardous waste in the Basel Convention of March 22, 1989, in its current version must be observed.

Chemicals or other materials that pose a danger when released into the environment shall be identified and managed in such a way that safety is ensured during handling, transportation, storage, use, recycling or reuse, and disposal. Employees shall be informed about the handling of hazardous materials and substances.

The business partner will label hazardous substances and chemicals and ensure safe handling, storage, transportation, and disposal. The business partner is obliged to comply with all applicable product safety regulations.

Respect for natural livelihoods and resources

The business partner commits to maintaining the ecological balance, avoiding environmental pollution, and conserving natural resources as part of a sustainability strategy. The PHW Group expects the business partner to continuously strive to improve the efficiency and sustainability of relevant business processes, for example, by introducing environmentally friendly technologies and keeping its ecological footprint as low as possible. Ecological responsibility should be taken throughout the entire product cycle, particularly regarding the packaging used.

The business partner is encouraged to reduce or avoid the use and consumption of resources during production, such as water, energy, and soil, as well as the generation of waste of any kind, as much as possible.

5. Business Integrity

Fair competition and antitrust law

The standards of fair business conduct, fair advertising, and fair competition must be adhered to. Furthermore, the applicable antitrust laws shall be applied, which prohibit agreements and other activities with competitors that influence prices or conditions. These regulations also prohibit agreements between the business partner and its customers that aim to restrict these customers in their freedom to autonomously determine their prices and other conditions in resale.

Avoidance of conflicts of interest

The business partner ensures that business decisions are made in the interest of the company. This means that business decisions are made free from any conflicts of interest with private concerns or other economic or other activities.

Combating corruption and bribery

The business partner conducts its business without bribery, corruption, or any kind of fraudulent business practices. The business partner will at least comply with national laws and regulations. Measures to prevent corrupt actions must be established and ensured through control systems.

Subsidy fraud and incitement to subsidy fraud

If a contract is awarded based on a formal tender, the business partner will not coordinate or agree on the offers with other bidders.

Money laundering prevention

The business partner complies with the legal requirements to prevent money laundering and does not participate in money laundering activities. Money laundering means that assets from criminal activities are brought into circulation through further business activities.

Confidentiality and data protection

The business partner commits to meeting the appropriate expectations of its client, suppliers, customers, consumers, and employees regarding the protection of private information. The business partner shall comply with the laws on data protection and information security and the official regulations when collecting, storing, processing, transmitting, and sharing personal information.

6. Acknowledgment and Agreement

The values, principles, and expectations set out in this Code of Conduct are an essential part of the business relationship between the business partner and PHW Group. By signing, the business partner agrees that this Code of Conduct becomes a contractual part of the business relationship between PHW Group and the business partner.

X

Date, Signature, Stamp

(Contract Partner)