

Code of Conduct
HoWe Wurstwaren KG, Nürnberg
as of 18.04.2023
(<https://www.howe-nuernberg.de/en/unternehmen/verhaltenscodex/>)

Corporate Guidelines for Governing Bodies, Employees, Business Partners, Direct and Indirect Suppliers, and Service Providers of HoWe Wurstwaren KG (hereinafter referred to as "HoWe") for sustainable business practices.

I. General Principles

HoWe is a fair market competitor that takes societal and environmental responsibility into consideration in its business dealings. HoWe understands this to mean sustainable action in all areas of the company and a cosmopolitan appearance in public as well as on the market towards commercial customers, end users and suppliers. It also governs all actions related to the manufacture of HoWe products when selecting and dealing with suppliers. HoWe ensures that the establishment and maintenance of the business relationships with direct customers and suppliers are based on the evaluation of objective criteria.

HoWe respects and aligns itself with national, as well as international, applicable laws, regulations, and standards. In doing so, HoWe takes into account existing national and cultural characteristics as well as other relevant influencing factors, but does not make any concessions with regard to the central points of this Code of Conduct, the contents of which the suppliers in particular must also measure themselves against.

At the heart of HoWe's mission statement is the consideration of human and environmental rights, which HoWe is committed to respecting. HoWe aligns its business activities along the value chain up to the finished product in all parts of the company and at all levels, from management to every employee, to ensure that the principles of our mission statement are fulfilled. The guiding principles for the protection of human rights are shaped by the "Guided Principles" of the United Nations (UNGP), as well as standards established by the Organisation for Economic Co-operation and Development (OECD) for the management of companies in order to improve the living conditions of people and especially children. Compliance with the ILO Core Labour Standards

(Labour and Social Standards) as well as ecological standards for sustainable management are a matter of course for HoWe. HoWe's production is 100% climate neutral.

HoWe establishes company regulations, guidelines, and measures concerning the structure of employment relationships for HoWe employees, which represent a protective mechanism for them, ensures a socially acceptable livelihood, the granting of social benefits and safe working conditions. HoWe strictly adheres to all regulations relevant to food production and ensures product safety as part of its quality requirements for suppliers with its own internal quality control guidelines and inspections. HoWe protects the trade and business secrets of its suppliers and customers.

II. Details

Criteria for a strong degree of social responsibility in the value chain

HoWe has identified eight main criteria, which are monitored internally by HoWe, that are to be respected in order to maintain a strong level of social responsibility in the value chain. They are:

1. Upholding Business Integrity
2. Production of Safe, High-Quality Products
3. Protection of Information
4. Clear, Correct and Complete Communication
5. Treating Employees Fairly and with Respect
6. Responsible Approach to the Environment (Sustainability)
7. Due Diligence in the Supply Chain
8. Obligation

1. Upholding Business Integrity

1.1 Competition and Antitrust Law

HoWe acts fairly and responsibly in the marketplace and is committed to complying with applicable competition and antitrust law. HoWe does not participate in anti-competitive or anti-trust agreements or in agreements with other companies that have the purpose or effect of restricting or preventing competition. Corruption, bribery or extortion for the purpose of obtaining economic benefits are not practiced nor are they tolerated. HoWe ensures that business relationships are based on objective criteria. In addition to quality, reliability and competitive prices, this also includes compliance with ecological and social standards as well as compliance with the principles of good corporate governance.

1.2 Money Laundering and Trade Controls

HoWe does not tolerate any activities related to money laundering. The identity of suppliers with whom HoWe has business relationships with is thoroughly verified by HoWe. This also applies in the event that HoWe initiates new business relationships. HoWe ensures that when exporting or importing goods or when using external service providers, the applicable export and import regulations are observed and that no violations of the import and export control regulations are committed by HoWe or on the behalf of HoWe.

2. Production of Safe, High-Quality Products

HoWe is aware of its responsibility as a manufacturer and supplier of meat products in relation to the health of its customers. In the contracts with our direct suppliers, they must guarantee to us that they comply with all current national, European and international regulations in regards to quality and hygiene relevant to food handling and are obliged to require the same from their own direct suppliers accordingly. This applies both to the products supplied by them and to the manufacture of products for processing and production processes, including their respective connected supply chains and services.

3. Protection of Information

Protection of Trade Secrets

HoWe protects all company information about its business partners and keeps it confidential unless it is in the public domain. This information is considered trade secrets, even if it does not expressly become the subject of corresponding agreements. Confidential information is one of the most valuable assets and therefore, trade secrets will not be passed on to third parties or made public, unless authorized to do so, ordered to be disclosed by the relevant authorities, or it is later in the public domain.

Data Protection

The safeguarding of information, personal privacy protection, and data processing security are important concerns for HoWe. HoWe takes all necessary precautions to ensure that the collection, processing and use of the personal data provided to HoWe is transparent, entrusted, accountable, carefully safeguarded, and in compliance with the applicable legal provisions of the EU General Data Protection Regulation (GDPR) and German data protection laws.

4. Clear, Correct and Complete Communication

Financial Reporting

HoWe's accounting and financial reporting will be proper, accurate, timely, complete and transparent in accordance with applicable legal regulations and standards. In addition, HoWe's key business processes are adequately documented as part of an internal control system. This ensures the complete and correct recording of accounting relevant information.

Communication

HoWe maintains clear and open communication with its suppliers. HoWe cultivates a matter-of-fact and polite tone in its external presentation.

Dealing with Local Authorities and Partners

HoWe strives to maintain an open and cooperative relationship with all authorities. If requested, information will be provided completely, truthfully, in a timely manner and in an understandable manner. HoWe is very attentive to open dialogue at the municipal and local level in the regions where HoWe is represented.

5. Treating Employees Fairly and with Respect

Health and Safety at Work

HoWe ensures safe and hygienic working conditions that comply with the applicable legal requirements in the field of occupational health and safety and take into account the regulations of professional associations. Appropriate measures to reduce the risk of accidents and improve working conditions are the aim of regularly implemented optimization programs. Every employee is informed about the applicable laws, regulations, and internal company guidelines on occupational health and safety where they can take advantage of training opportunities.

Working Conditions and Social Standards

HoWe complies with applicable labour laws and international standards, in particular those of the ILO. HoWe condemns all forms of forced labour and child labour of children who have not finished school and are used under exploitative conditions. The remuneration paid to HoWe's employees shall be at least in accordance with the current statutory minimum wage regulations, including provisions on overtime, statutory working hours and paid holidays.

Reconciling Work and Family Life

HoWe, creates an appropriate balance between the economic interests of the company and the private interests of its employees. The resulting satisfaction and motivation of the employees contributes significantly to the company's success.

Diversity and the Principle of Equal Treatment

HoWe is committed to diversity and tolerance. The aim is to achieve the highest level of productivity, innovation and efficiency. Discriminatory and harassing acts, for example based on social and national origin, gender, ethnic origin, religion, age, illness or disability, sexual orientation, political opinion or other personal characteristics, will not be permitted under any circumstances. Every single person has a right to fair and respectful treatment.

Social Dialogue, Freedom of Association and the Right to Collective Bargaining

HoWe respects freedom of association and thus the right of all workers to form and join trade unions. Employees and their representatives must not suffer any personal or professional disadvantage from exercising these rights.

Human Rights

HoWe respects the regulations in force for the protection of human rights, which are an integral part of our corporate responsibility. Whether an internal employee of HoWe or the employee of a supplier, respect, dignity, and personal rights of the individual is foremost.

Child Labor and Forced Labor

Child labor or forced labor is prohibited. In particular, young employees who are still in training are protected from performing work that could impair the success of their training or endanger their health or physical, psychological, social or intellectual development.

6. Responsible Approach to the Environment (Sustainability)

HoWe aligns its actions along the entire value chain from raw materials to finished products in all regions from which they originate or in the supply chain in which they are passed on, as well as at all levels of the company - from management to each individual employee - in terms of sustainability. HoWe takes care to minimize resource requirements including energy use and emissions, water consumption and wastewater, as well as waste and potential

environmental impacts in the supply chain. All procedures and standards must at least meet or exceed legal requirements.

7. Due Diligence in the Supply Chain

HoWe assumes due diligence responsibilities in the supply chain, regardless of whether HoWe is legally obliged to do so, and will take preventive and, if necessary, remedial measures if violations of the corporate principles of this Code of Conduct become known.

8. Obligation

The HoWe Code of Conduct is binding for all managers and employees at HoWe. HoWe's Code of Conduct supports them in acting responsibly, appropriately and in accordance with the law in the performance of their duties and especially in critical situations.

III. Standards of Conduct for Suppliers

HoWe derives its requirements for Standards of Conduct/Code of Conduct for Suppliers from its Code of Conduct.

HoWe's suppliers are guided by the Code of Conduct that HoWe has set up for its own company. The Supplier Code of Conduct becomes an integral part of the contractual business relationship between HoWe and the supplier.

Suppliers undertake to conduct their business in an ethical, legal and responsible manner and to align their business activities with the HoWe Code of Conduct. To the extent that it is within HoWe's sphere of influence and achievable with appropriate measures, this Code of Conduct is to be enforced for all suppliers throughout the value chain. Direct suppliers have to take on the task of influencing their direct suppliers. Therefore, suppliers are asked to select their suppliers according to whether they can comply with the guiding principles of this Code of Conduct and to contractually influence them as well to follow the principles contained in this Code of Conduct.

On the basis of the main criteria listed above and other details, suppliers must fulfill their social responsibility as a company in an appropriate manner to their company size. At best, a supplier can meet the resulting obligations with a management system that it organizes and monitors independently:

1. Upholding Business Integrity

In order to comply with the values described above, HoWe expects in particular that the supplier has meaningful information, which it has obtained in compliance with data protection regulations in order to be able to present during the course of the business relationships without violating confidentiality obligations. The supplier shall ensure, through targeted influence and training, that its employees act exclusively in the interests of their company and always separate private or own economic interests from it. Even in the case of business relationships with third parties, only objective criteria count for suppliers. In compliance with national and international laws, suppliers shall ensure that transactions with third parties do not violate trade regulations such as economic embargoes, import and export control requirements or applicable regulations for the prevention of terrorist financing and money laundering.

2. Production of Safe, High-Quality Products

The supplier is required to comply with all national, European and international regulations on quality and hygiene relevant to the food industry. This applies both to the products supplied by them and to the manufacture of products for processing and production processes, including their respective connected supply chains and services.

3. Protection of Information

Suppliers shall protect and maintain the confidentiality of all company information about HoWe and its business partners. They are considered trade secrets, even if they are not expressly the subject of non-disclosure agreements. Confidential information is one of the most valuable assets. Trade and business secrets may not be passed on to third parties or even made public. HoWe's suppliers undertake to ensure an appropriate standard of security for the processing of information so that confidentiality, integrity and verifiability of the information worthy of protection are ensured and unauthorized use is prevented. For personal data, the supplier creates the legal and technical requirements so that information can be provided about this data, if it has been collected or processed, and the request for deletion from the concerned party can be complied with.

Data Protection

The safeguarding of information, personal privacy protection, and data processing security are important concerns for HoWe. The supplier must take all necessary precautions to ensure that the collection, processing and use of

the personal data provided by HoWe is transparent, entrusted, accountable, carefully safeguarded, and in compliance with the applicable legal provisions of the EU General Data Protection Regulation (GDPR) and German data protection laws.

4. Clear, Correct and Complete Communication

Financial Reporting

Suppliers' accounting and financial reporting shall be carried out in a proper, correct, timely, complete and transparent manner in accordance with the relevant legal regulations and standards. In addition, essential business processes must be adequately documented as part of an internal control system. This must ensure the complete and correct recording of relevant accounting information.

Communication

HoWe expects its suppliers to value clear and open communication. The suppliers shall maintain a factual and polite tone in their external presentation.

Dealing with Local Authorities and Partners

The suppliers strive to maintain an open and cooperative relationship with all authorities. Information is provided in a complete, truthful, timely and understandable manner. Likewise, suppliers shall respect an open dialogue at municipal and local level in the regions where HoWe is present.

5. Treating Employees Fairly and with Respect

Health and Safety at Work

The suppliers shall ensure safe and hygienic working conditions that comply with the applicable legal requirements in the area of occupational health and safety. Appropriate measures to reduce the risk of accidents and improve working conditions are the aim of regular optimization programs. Every employee of a supplier should be aware of the applicable laws, regulations and internal company guidelines regarding the occupational health and safety of the supplier.

Working Conditions and Social Standards

Suppliers comply with the labor laws and international standards applicable in the respective countries. Compensation paid to employees must comply with all applicable laws on wages and salaries, including provisions on minimum salaries, overtime, statutory benefits, working hours, and paid holidays.

Reconciling Work and Family Life

Suppliers create an appropriate balance between their economic interests and the private interests of the employees, because the resulting satisfaction and motivation of the employees contributes significantly to the company's success.

Diversity and the Principle of Equal Treatment

Suppliers are committed to diversity and tolerance. The aim is to achieve the highest level of productivity, innovation and efficiency. Under no circumstances shall discriminatory and harassing acts be permitted, for example on the basis of social and national origin, gender, ethnic origin, religion, age, illness or disability, sexual orientation, political conviction or other personal characteristics. Every individual has a right to fair and respectful treatment.

Social Dialogue, Freedom of Association and the Right to Collective Bargaining

Suppliers respect freedom of association and thus the right of all workers to form and join trade unions. Suppliers recognize the right of workers to collective bargaining and respect the rights of trade unions. Employees and their representatives must not suffer any personal or professional disadvantage from exercising these rights.

Human Rights

Suppliers comply with the applicable regulations on the protection of human rights, which are an integral part of corporate responsibility. The employees of a supplier shall respect the dignity and personal rights of every other employee and/or colleague as well as third parties with whom the company has a business relationship with.

Child Labor and Forced Labor

Suppliers shall not accept any form of child labor, forced or compulsory labor. Suppliers shall comply with all relevant national and international laws, rules and regulations applicable in their respective countries, as well as applicable international standards. Young workers, in particular, need to be protected from carrying out work that is likely to impair their training or endanger their health or physical being, psychological state, social or spiritual development.

6. Responsible Approach to the Environment (Sustainability)

Suppliers shall align their actions along the entire value chain from raw materials to finished products in all regions from which they originate or are passed on in the supply chain, as well as at all levels – from management to each individual employee – in terms of sustainability. Suppliers take care to minimize resource requirements, including energy use and emissions, water consumption and wastewater, as well as waste and potential environmental impacts in the supply chain. All procedures and standards must at least meet or exceed legal requirements.

7. Due Diligence in the Supply Chain

Suppliers shall adhere to the standards set by HoWe when selecting and engaging their own suppliers. HoWe reserves the right to verify compliance with the requirements of the Code of Conduct of its direct suppliers and will approach them as soon as information becomes known about non-compliance with the guiding principles of this Code of Conduct in the supply chain in order to discuss remedial measures or find other solutions. This does not affect the exercise of rights arising from concluded contracts with the respective suppliers.

8. Obligation

HoWe's direct suppliers must contractually commit to complying with this Code of Conduct regarding HoWe and contractually require their suppliers to also accept these corporate principles. Compliance with the HoWe's principles by suppliers is a prerequisite for HoWe to be able to assess suppliers as credible and reliable partners.