

## Code of Conduct for HoWe Wurstwaren KG and Business Partners

#### I. **General Principles**

Our actions toward our employees, customers, business partners, and the public are guided by high ethical and legal principles.

HoWe Wurstwaren KG assumes social and ecological responsibility in its business areas. Accordingly, we attach great importance to sustainable business practices and consistently implement socially ethical principles within our company.

We also apply this expectation to our suppliers, business partners, and service providers, with the goal of establishing a sustainable supply chain.

HoWe respects and adheres to applicable national laws and regulations, as well as international standards.

HoWe takes into account existing national and cultural characteristics and other relevant influencing factors, but makes no concessions regarding the core principles of this Code of Conduct and its content, which suppliers, in particular, must also adhere to.

The core of HoWe Wurstwaren KG's corporate mission statement is compliance with all applicable laws and regulations, internationally recognized human rights, and occupational health and safety and social standards.

Our Code of Conduct describes the principles that govern our own business activities and our collaboration with business partners. These guidelines represent minimum standards for our business relationships and are based, among others, on the following international guidelines and principles:

- UN Guiding Principles on Business and Human Rights (UNGPs)
- UN Convention on the Rights of the Child
- Conventions of the International Labour Organization (ILO)
- Paris Climate Agreement

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At HoWe Wurstwaren KG, the Code of Conduct is supplemented by company policies, operational regulations, and measures.

HoWe ensures socially acceptable incomes, the maintenance of social standards, and safe working conditions.

HoWe strictly adheres to all relevant regulations for food production at its production site and ensures product safety within the framework of its quality standards for suppliers and its own incoming goods and quality control procedures. Individual requirements applicable to customers in other countries are observed, provided they have been agreed upon with the customer for products with a different distribution area.

HoWe Wurstwaren KG protects the trade and business secrets of its business partners and customers.

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## II. Corporate Guideline of HoWe Wurstwaren KG

HoWe Wurstwaren KG defines the following principles of its economic activities in order to assume social responsibility.

## 1.) Integrity in Business Conduct

#### Competition and Antitrust Law

HoWe Wurstwaren KG respects the principles of fair competition and complies with the relevant antitrust regulations.

HoWe does not participate in any agreements or arrangements with other companies that violate competition or antitrust law and that have the purpose or effect of restricting or preventing competition.

Any form of corruption, extortion, embezzlement, bribery, acceptance of undue benefits, or misappropriation is strictly prohibited. In the course of its business activities, HoWe neither requests nor grants unlawful gifts or other improper advantages – neither for itself nor for third parties.

Gifts and favors are permitted only within the framework of generally accepted business practices.

#### Money Laundering and Trade Controls

HoWe Wurstwaren KG does not tolerate any activities related to money laundering. The identity of suppliers with whom HoWe maintains or intends to maintain business relationships is carefully verified.

HoWe ensures that applicable export and import regulations are observed when exporting or importing goods or when using secondary service providers, and that no violations of import and export control regulations are committed on the initiative of HoWe.

#### Protection of Trade Secrets and Data Protection

HoWe Wurstwaren KG guarantees the protection of confidential information and personal data and uses them exclusively for the purpose of fulfilling the agreed services. All information provided will be treated in accordance with applicable legal requirements regarding data protection and information security. In particular, all trade secrets and confidential information obtained within the scope of the business relationship will not be used for personal benefit or passed on to third parties unless disclosure is ordered by an official authority.

Protecting informational self-determination and the protection of privacy, as well as the security of data processing, are important concerns for HoWe. All necessary precautions are taken to ensure that the collection, processing, and use of personal data provided to HoWe is transparent, purpose-specific, traceable, and careful, and in compliance with the applicable legal provisions of the EU General Data Protection Regulation and German data protection law.



## Production of Safe High-Quality Food Products

HoWe is aware of its responsibility as a food producer and supplier of cured meats in terms of quality, customer satisfaction and health. To this end, measures are taken in particular with regard to primary production, hygiene conditions in food processing, packaging, labelling and the authorisation of official controls. In the contracts with the direct suppliers, they must ensure to HoWe that they comply with all current national, European or international regulations on quality and hygiene relevant to food items and that they oblige their own direct suppliers accordingly. This applies both to the products to be supplied by them and to the manufacture of products for the work and production processes, including associated supply chains and services.

## 2.) Corporate Social Responsibility

# Human Rights, Diversity and the Principle of Equal Treatment

HoWe respects applicable human rights regulations, which are an integral part of corporate responsibility.

This includes the principle of equal treatment.

HoWe is committed to diversity and tolerance; ethnic and national origin, gender, religion, political beliefs, illness or disability, age, sexual orientation, physical appearance, or other personal characteristics never lead to discrimination within our company.

We value the personal dignity, privacy, and personal rights of every individual.

## Child and Forced Labor

Child labor, forced labor, and any form of work under exploitative conditions do not exist at HoWe Wurstwaren KG and are condemned in the strongest possible terms. The recommendations of the ILO conventions regarding the minimum age for employment of young workers are observed. Young workers are protected from performing work that could impair the success of their education or endanger their health or their physical, psychological, social, or intellectual development.

## Working Conditions and Social Standards

HoWe complies with applicable labor laws and employers' liability insurance regulations at its site and adheres to international standards, particularly those of the ILO. The remuneration paid to employees corresponds at least to the current statutory minimum wage regulations or generally binding rates under the Posted Workers Act. HoWe complies with the German Working Hours Act, the legally required continued payment of wages in the event of illness, as well as the provisions regarding compensation/compensation for overtime, weekend and holiday work, and paid vacation. Furthermore, HoWe strikes an appropriate balance between the company's economic interests and the private concerns of its employees to promote the compatibility of family and work.



## **Occupational Safety**

HoWe ensures safe and hygienic working conditions that comply with applicable legal requirements regarding occupational health and safety. Internal guidelines regarding employee health and safety, production hygiene, building, plant, and workplace safety are observed by all employees. All necessary measures are taken to reduce accident risks and improve working conditions. Every employee is informed about applicable laws, regulations, and internal company guidelines regarding occupational health and safety and is trained accordingly.

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

HoWe respects freedom of association and thus the right of all employees to form and join trade unions. Employees will not suffer any personal or professional disadvantages as a result of exercising these rights.

#### 3.) Responsibility for the Environment and Climate

#### **Environmental Protection**

HoWe aligns its actions with sustainability and lives up to its responsibility for environmental and climate protection.

By avoiding unlawful environmental impacts, as regulated, among other things, by the Basel Convention on the Management of Hazardous Substances and Wastes, HoWe Wurstwaren KG ensures environmental protection.

The company refrains from polluting water and air, causing harmful soil changes, and emitting legally unacceptable noise.

Land, forests, or waterways whose use secures people's livelihoods are never illegally confiscated.

#### **Ecological Footprint**

HoWe Wurstwaren KG is committed to gradually reducing resource consumption and environmental impact. This is based on an annual assessment in accordance with the Greenhouse Gas Protocol (GHG Protocol).

As a member of the Science Based Targets Initiative, it strives to gradually improve its ecological footprint at the company level (CCF) and product level (PCF).

Furthermore, HoWe Wurstwaren KG's energy management system is certified according to DIN ISO 50001.

#### Resource Consumption

HoWe strives to continuously reduce, or ideally eliminate, the use and consumption of resources and the generation of any kind of waste. Resource consumption is systematically monitored and documented with the goal of identifying and implementing economically viable solutions to improve energy efficiency and reduce resource consumption and waste generation.

#### Waste Management

HoWe Wurstwaren KG implements the careful and responsible handling of hazardous waste, industrial wastewater, air emissions, and other waste materials. Waste is disposed of properly and, where possible, recycled. Chemicals and other potentially environmentally harmful materials are clearly identified and handled in a manner that ensures the highest level of safety during transport, storage, use, recycling, and disposal.



## 4.) Compliance with Corporate Guidelines

HoWe Wurstwaren KG ensures the implementation of these corporate guidelines, which are intended to complement the Compliance Management Manual.

This Code of Conduct is binding for all HoWe managers and employees. Appropriate and reasonable measures are taken to prevent and eliminate violations. HoWe Wurstwaren KG also incorporates standards of conduct for suppliers and business partners (Section III) into its General Terms and Conditions of Purchase to

adequately fulfill its duty of care in its supply chain, independent of any legal obligation.

## III. Standards of Conduct for Suppliers and Business Partners

HoWe derives appropriate standards of conduct for suppliers, service providers, and business partners (hereinafter "business partners") from its principles and corporate guidelines (Sections I and II).

This Code of Conduct forms part of the contractual relationship between HoWe and the business partner. The business partner undertakes to conduct its business activities in an ethical, legal, and responsible manner and to align its business actions with the HoWe Wurstwaren KG Code of Conduct.

To the extent that it is within HoWe's sphere of influence and achievable through reasonable measures, this Code of Conduct shall be enforced against all direct business partners.

Business partners must fulfill their corporate social responsibility based on the following guidelines in a manner appropriate to their company size. The resulting obligations are ideally fulfilled through a management system.

#### 1.) Integrity in Business Conduct

# Competition and Antitrust Law

The business partner respects the principles of fair competition and complies with the relevant antitrust regulations.

They do not participate in any agreements or arrangements with other companies that violate competition or antitrust law and that have the purpose or effect of restricting or preventing competition.

Any form of corruption, extortion, embezzlement, bribery, acceptance of benefits, or misappropriation is strictly prohibited. In the course of their business activities, they neither request nor grant unlawful gifts or other improper advantages – neither for themselves nor for third parties.

Gifts and favors are permitted only within the framework of generally accepted business practices.

#### Money Laundering and Trade Controls

The business partner does not tolerate any activities related to money laundering. The identity of suppliers with whom it maintains or intends to maintain business relationships is carefully verified. The business partner ensures, in compliance with national and international laws, 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.

#### Protection of Trade Secrets and Data Protection

The Business Partner shall ensure the protection of confidential information and personal data and shall use them exclusively for the purpose of performing the agreed services. All information provided will be handled in accordance with the applicable legal requirements on data protection and information security. In particular, all trade secrets



and confidential information obtained in the course of the business relationship will neither be used for one's own benefit nor passed on to third parties, unless the release is ordered by the authorities.

The preservation of informational self-determination and the protection of privacy as well as the security of data processing are important concerns. All necessary precautions are taken to ensure that the collection, processing and use of the personal data provided is transparent, purpose-bound, comprehensible, careful and in compliance with the applicable legal provisions of the EU General Data Protection Regulation and German data protection law. For personal data, the business partner creates the legal and technical prerequisites so that information can be provided about this data, if it has been legitimately collected or processed, and the request for deletion of the entitled party can be complied with.

#### Production of Safe High-Quality Food Products

Where applicable, the business partner is aware of its responsibility as a food producer with regard to quality, customer satisfaction, and health. The business partner is required to comply with all national, European, and international quality and hygiene regulations applicable to the food industry. This applies to both the products and the work and production processes, including associated external supply chains.

## 2.) Corporate Social Responsibility

#### Human Rights, Diversity and the Principle of Equal Treatment

The business partner respects applicable regulations for the protection of human rights, which are an integral part of corporate responsibility. Furthermore, the business partner promotes diversity and tolerance and observes the principle of equal treatment. Ethnic and national origin, gender, religion, political beliefs, illness or disability, age, sexual orientation, appearance, or other personal characteristics will never lead to discrimination within the company.

The personal dignity, privacy, and personal rights of every individual are assets worthy of protection.

#### Child and Forced Labor

The business partner does not accept any form of child labor or forced labor and condemns any form of work performed under exploitative conditions.

The recommendations of the ILO conventions regarding the minimum age for employment of young workers are observed. Young workers are protected from performing work that could impair the success of their education or endanger their health or physical, psychological, social, or intellectual development.

#### Working Conditions and Social Standards

The business partner complies with the labor laws and professional association regulations applicable to its business area and adheres to international standards, particularly those of the ILO.

The remuneration paid to employees corresponds at least to the current statutory minimum wage regulations or generally binding tariffs under the Posted Workers Act. The business partner observes the Working Hours Act, the legally required continued payment of wages in the event of illness, as well as the provisions regarding the remuneration/compensation of overtime, weekend and holiday work, and paid vacation. Furthermore, the business partner strikes an appropriate balance between the company's economic interests and the private concerns of its employees to promote the compatibility of family and career.



## Occupational Safety

The business partner ensures safe and hygienic working conditions that comply with applicable legal requirements regarding occupational health and safety. Internal guidelines regarding health and safety, production hygiene, building, plant, and occupational safety are observed by all employees. All necessary measures are taken to reduce the risk of accidents and improve working conditions. Each employee is informed about applicable laws, regulations, and internal company guidelines regarding occupational health and safety and is trained accordingly.

Social Dialogue, Freedom of Association and the Right to Collective Bargaining The business partner recognizes the freedom of association and thus the right of all employees to form and join trade unions. Employees will not suffer any personal or professional disadvantages as a result of exercising these rights.

# 3.) Responsibility for the Environment and Climate

## **Environmental Protection**

The business partner aligns its actions with sustainability and fulfills its responsibility for environmental and climate protection.

HoWe Wurstwaren KG ensures environmental protection by avoiding unlawful environmental impacts, as regulated, among other things, by the Basel Convention on the Management of Hazardous Substances and Wastes.

The company refrains from polluting water and air, causing harmful soil changes, and emitting legally impermissible noise.

Land, forests, or water bodies whose use secures people's livelihoods are never unlawfully confiscated.

#### **Ecological Footprint**

The business partner pursues a continuous reduction in resource consumption and environmental impact.

This applies in particular to our raw material suppliers:

An annual audit in accordance with the requirements of the Greenhouse Gas Protocol (GHG Protocol) should form the basis for the targeted reduction in environmental impact. Membership in the Science Based Targets Initiative, including a gradual improvement of the ecological footprint at the company level (CCF) and product level (PCF), should be pursued.

The implementation of an environmental management system according to EMAS or ISO 14001 or an energy management system according to DIN ISO 50001 should already be implemented or will be implemented soon.

## Resource Consumption

The business partner strives to continuously reduce the use, consumption, and generation of waste of any kind, or ideally, to eliminate it altogether. Resource consumption should be systematically monitored and documented with the aim of identifying and implementing economically viable solutions to improve energy efficiency and reduce resource consumption and waste generation.

#### Waste Management

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The business partner implements the careful and responsible handling of hazardous waste, industrial wastewater, air emissions, and other waste materials. Waste is disposed of properly and, where possible, recycled. Chemicals and other potentially environmentally harmful materials are clearly identified and handled in a manner that ensures the highest level of safety during transport, storage, use, recycling, and disposal.



## 4.) Compliance with the Code of Conduct

The business partner adheres to the standards established by HoWe when selecting and commissioning its own suppliers. HoWe reserves the right to review the business partner's compliance with the requirements of the Code of Conduct. As soon as information becomes known about non-compliance with the principles of this Code of Conduct, HoWe will contact the business partner to discuss remedial measures or find alternative solutions. This does not affect the exercise of rights under contracts concluded with the respective business partners.

This Code of Conduct does not claim to be exhaustive. Regardless of any other applicable statutory or contractual rights and obligations, it forms the basis for all future deliveries and services of the business partner. At the same time, it constitutes a binding part of our General Terms and Conditions of Purchase and service provider contracts.

The applicable law of the Federal Republic of Germany applies. The place of jurisdiction for all disputes arising from or in connection with these provisions is Nuremberg, Germany.

Nuremberg, June 5, 2025

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