



CODE OF CONDUCT



PREFACE

The Coffein Compagnie has been refining coffee and producing caffeine since 1931. We carefully control our processes and are diligent in handling our products.

We are successful because:

- We maintain trusting relationships with our business partners
- We provide quality
- We act responsibly with the focus on our customers
- We are competent specialists and find customized solutions.

As a Business to Business partner, the success of our partners and customers also makes us successful. This is an essential factor in why we are today the world's largest supplier of decaffeinated green coffee and natural caffeine. Our company operates and grows worldwide. The laws, rules of conduct, and customs that we encounter daily are as different as the employees within the Coffein Compagnie and its affiliates.

Our common success is based on the confidence of customers, suppliers, and employees. Therefore, we place great emphasis on the "responsible conduct" of each and every individual in the Coffein Compagnie Group. We all bear the responsibility together for creating and maintaining a company culture in which the pertinent statutory regulations and provisions as well as ethical principles are properly maintained.

We encourage all individuals who are working within the Coffein Compagnie Group to maintain integrity and exercise good judgement. In a globalized and increasingly regulated world, complexity is increasing and it is not always easy to evaluate if a behavior is ethically correct and compliant with the prevailing laws in all respects. With the Code of Conduct, we have created a common basis designed to provide an overview of our fundamental values such as reliability, quality and responsibility, and to give orientation.



PREFACE

What is important for us:

RELIABILITY	QUALITY	RESPONSIBILITY
Trustworthiness	Diligence	Integrity
Predictability	Competence	Respect
Continuity	Improvement	Fairness

The Code of Conduct helps to implement the values of our company into our daily business. It describes the behaviors which we consider as generally appropriate conduct for human relations within the Coffein Compagnie Group. Our management rules and guidelines build on such behaviors and have been included in our Management Manual. The Code of Conduct addresses how we handle possible questions or difficult situations that concern our business practices or personal relationships. It substantiates our value system and guides us to act in a fair and sustainable manner. At the same time, it allows employees to act in a courageous and entrepreneurial way. Each individual is expected to comply with the Code of Conduct.

RELIABILITY

WHY RELIABILITY IS IMPORTANT TO US

The confidence and trust of our customers, suppliers and employees is the basis of our success. Reliability is at the core of our relationship with our customers. We therefore follow clear ethical values and act honestly and responsibly toward our customers and business partners, the environment, the societies in which our Group maintains a presence, and last but not least, within our Group.

COMPLIANCE WITH LAWS AND REGULATIONS



Complying with rules is the indispensable basis for trust and our basis for sustainable growth.

We operate within the framework of existing legislation. The observance of and compliance with all national and international laws, regulations and legal provisions applicable for our company and our business relations are a matter of course for our actions. Legal regulations in the fields of product safety, occupational safety, and environmental protection form the basis for particular internal policies to implement these legal requirements. It is the responsibility of all employees to comply with applicable laws and internal policies.

WE TAKE THE PROTECTION OF HUMAN AND EMPLOYEE RIGHTS SERIOUSLY

We are globally connected and every day we encounter new challenges to orient ourselves in a business world that is becoming more and more complex. We respect the internationally accepted social and labor standards, as set forth by the *International Labour Organization* (ILO). We have implemented the basic principles of the *Ethical Trade Initiative* (ETI)^{1,2}, and especially reject the commercial and social exploitation of children. We respect the Declaration of Human Rights of the *United Nations* (UN) and commit ourselves to respect and comply with human rights in all of the countries where we do business.

¹ www.ethicaltrade.org/resources/eti-base-code.

² Coffein Compagnie Management manual: *Base Code of Ethical Trade Initiative (ETI)*.



RELIABILITY / QUALITY

DIFFERENCE IS VALUABLE FOR US

As a fair and open company, we support equal rights. All employees, customers and suppliers have the right to be treated fairly, respectfully, with dignity, politely, and indiscriminately. We are dedicated to this principle and are willing to enforce it within our company. The Coffein Company and its affiliates are committed to enforce the right to a working environment without discrimination and without physical, sexual or verbal harassment or abuse. Any kind of discrimination, harassment or abuse due to gender, race or ethnic origin, religion or ideology, disability, age or sexual orientation is strictly forbidden and will not be tolerated.

If you believe that you have been discriminated against, harassed, abused or otherwise placed in a situation of disadvantage, please inform your superior or the ethics and compliance office about the facts of your situation³. The Coffein Compagnie assures all employees that all complaints will be treated in a confidential manner and that barring malicious intent, there will be no repercussions due to a notification.

QUALITY

QUALITY IS DILIGENCE, COMPETENCE AND CONTINUOUS IMPROVEMENT

Competence, experience and our passion for coffee makes us the leading decaffeination company worldwide. We place high demands on ourselves and on our processes and perform each step most diligently. The quality of our products and services depends on each and every individual's contribution. We thoroughly and sustainably implement all necessary improvements relating to our processes. In doing so, we comply with internationally accepted guidelines regarding product safety and quality.



We understand quality as a dynamic process of continuous improvement.

³ Refer to Chapter: Reporting violations and company agreement regarding the establishment of a trust agency



QUALITY

MEANINGFUL COOPERATION ENSURES THE QUALITY OF OUR PRODUCTS AND SERVICES

Meaningful cooperation is characterized by a fair and respectful interaction with one another. The Coffein Compagnie is committed to a work environment which characterizes itself by regulated working hours, appropriate leave arrangements, performance-based salaries, physical and mental well-being, effective communication structures, appreciation of achievements, and personal development.

PROMOTION OF HEALTH AND SAFETY IN THE WORK PLACE

The Coffein Compagnie commits itself to providing healthy and safe working conditions for all employees and to continuously improving these conditions. All employees are instructed on a regular basis with regard to workplace health and safety. Employees are invited to consult their superior at any time and ask for additional assistance or to make suggestions for work place improvement. All employees are jointly responsible for safety in their workplaces.



We all contribute to a safe work environment and follow these simple rules:

- We comply with the provisions for a healthy and safe work place.
- We act with prudence and attentiveness to avoid potentially dangerous situations. In a dangerous situation, we inform colleagues as well as superiors, and attempt to the best of our ability to contain the danger.
- We inform our superior(s) about all potentially unsafe situations.

SAFEGUARDING OUR PRODUCTS AND FOOD SAFETY

We are concerned with consumer protection. We take responsibility for protecting our products from outside impacts and for food safety. Our quality management system is designed to monitor our processes to secure food safety and is regularly verified and certified by an independent organization according to the *International Featured Standard Food* (IFS). Our DIN EN ISO/IEC 17025 accredited laboratory is responsible for analyzing daily samples of our process controls as well as the analytics of incoming and outgoing products and process media. Our culture of openness toward our customers encourages them to visit our production sites and to inform themselves about our process routines.



QUALITY

WE USE RESOURCES SPARINGLY AND ACT IN AN ECO-CONSCIOUS WAY

We are concerned with protecting our environment and managing our processes to promote sustainable solutions. The efficient use of all supplies, operating materials and resources, as well as an eco-conscious production focused on minimizing emissions, are an integral part of our environmental awareness and company goals. We make every effort to find environmentally friendly solutions and improvements for all of our processes, including recycling and the reduction of our carbon footprint. Such actions also support our economic goals and our competitiveness. We have established an Energy Management System according to DIN EN ISO 50001 and an Emissions Management Team to monitor and improve our use of energy and to reduce emissions such as small particles, dust, noise, and wastewater. We ask our vendors to support our efforts, and we participate in the European Emissions Trade platform as a market oriented tool for reducing the total carbon footprint in the European Union.

DATA PROTECTION

Data protection serves the right of informational self-determination. Unless legally required by governmental institutions, each individual has the right to decide how their personal data is used.

The Coffein Compagnie generally does not collect, process or use personal information unless compliance with applicable law has been determined in advance. The handling of personal data should be transparent for the person concerned. Upon request, we will provide information about the handling of individual personal data and offer the possibility to correct these data as necessary. We respect the right to object to the processing of certain personal data. Within the framework of the General Data Protection Regulation (GDPR), we have reevaluated and adapted all relevant processes regarding the processing of personal data.

PROTECTION OF OUR COMPANY PROPERTY AND OUR TRADE SECRETS

The tools and equipment, which are made available by the Coffein Compagnie, are to be handled with care and protected against damage and theft. The technical and business knowledge of the Coffein Compagnie is to be protected by each employee. It is prohibited to forward proprietary information of the Coffein Compagnie to unauthorized third parties.

RESPONSIBILITY

WE ACT RESPONSIBLY

Responsible management means to align the company according to its legal framework, to comply with the principles laid down therein, and to communicate transparently. We are committed to our employees, our business partners, and other regional as well as international stakeholder groups to treat all individuals and groups associated with the Coffein Compagnie Group with integrity, fairness and respect.

WE ARE FAIR

The Coffein Compagnie commits itself to free and fair competition. We act in compliance with applicable cartel and competition provisions. Agreements of any kind or concerted practices with competitors or customers which are aimed at restricting competition or having an anti-competitive effect are considered violations of the antitrust law. Business meetings with competitors could be considered or interpreted as violations of antitrust regulation. If a business-related discussion about one or more of the following topics occurs with competitors or customers, you should either not participate in the discussion or leave the meeting immediately. Meetings outlined below represent or may at the very least indicate an anti-competitive cooperation:

- Agreements to fix or control prices
(e.g. minimum prices, minimum fees or discounts)
- Exchange of information regarding prices, sales conditions, price discounts, and measures for sales promotion
- Agreements regarding the territorial distribution of markets; specific requirements regarding tendering
- Agreements regarding the assignment of customers, limits of productions, or of the sales of products
- Agreements regarding the boycott of certain suppliers or customers
- Agreements regarding vertical limitations
(i.e. prohibition of forwarding discounts).



RESPONSIBILITY

WE CLASSIFY PRESENTS AND INVITATIONS CORRECTLY

Employees who are offered presents or invitations by business partners may face a conflict of interest. It could create the impression that the giver or the inviter expects an advantage. The slightest appearance of impropriety might result in an investigation by authorities and thus damage the good reputation of the company. Everyone in the Coffein Compagnie Group is encouraged to avoid conflicts of interest. In case of uncertainties regarding presents or invitations, consult your supervisor immediately and disclose the potential conflict of interest.



How to avoid conflicts of interest:

- We refuse valuable presents, donations and financial benefits and do not grant them to business partners.
- We only accept token presents, if they are given as an act of courtesy and do not require any favor in return. In case of invitations, we make sure that they are appropriate and that no favor is expected in return.
- We do not accept any presents which are sent to a private address.

WE DECLINE THE ACCEPTANCE OF ILLEGAL BENEFITS AND BRIBERY

The Coffein Compagnie ensures appropriate transparency when interacting with customers, suppliers and authorities and complies with international standards as well as national and local rules in the fight against corruption. It is the obligation of all employees to refrain from offering presents or benefits to government agencies, official bodies, or private business partners. This pertains to the acceptance of presents and benefits as well.

WE ARE AMBASSADORS OF THE COFFEIN COMPAGNIE

Within the coffee sector, the Coffein Compagnie is considered a good employer and a competent and trustworthy business partner. Every employee has an effect on the image and hence the commercial success of our company with their statements in the professional and private environment or in the internet and social media. Respectful and non-defamatory behavior is in the interest of every individual who is employed by the Coffein Compagnie Group, and by extension, will reflect on the Group in general.

LIVING THE CODE OF CONDUCT

This Code is our mutual guide in a business world becoming more and more complex. It is the basis for our Management Manual which describes our management rules and management guidelines that govern our daily work routine. This Code of Conduct shall be respected even if the applicable laws or provisions are less extensive. It cannot be excluded, however, that stricter or broader laws and provisions than the ones outlined in this Code may apply. In this case, such stricter and broader laws and provisions will prevail. As is often the case, our Code cannot take every situation or issue with which we are confronted in our business life into consideration or specify a particular conduct for them. The basic values summarized in the Code form the framework of responsibilities for each and every employee of the Coffein Compagnie Group. The content of the Code is communicated within the Group by means of notices, newsletters or the intranet, as well as externally through our homepage. It's content and understanding are trained through exercise programs on a regular basis. The implementation of our Code is subject to an examination by an independent organization. These social audits take place regularly at our company and are intended to review the ethical values and the social standards of our company. In this way, we verify both for ourselves and for our customers that our Code is understood and followed by each individual in the company.

The Code of Conduct is part of the employment relationship and indispensable for the Coffein Compagnie's general performance of business. Those who do not read or do not accept our Code are not exempt from every employee's responsibility to comply with it. Violations of the rules and provisions of this Code cannot and will not be tolerated and can result in consequences for the employee, including the extraordinary termination of the employment contract and other legal consequences.

REPORTING VIOLATIONS

The principle of fairness is the focus of our Code. If cause for complaints or conflicts arise, we suggest as a first approach the direct personal discussion between involved colleagues. If this is not possible, we suggest the consultation of superior(s) so that every effort can be made to resolve the situation on a personal level.^{4,5}

There may be situations that cannot be resolved on a personal level. To address these situations, we have appointed a female and a male compliance contact person to discuss and/or to follow up on complaints or information regarding violations of the Code of Conduct in a confidential manner.

⁴ Coffein Compagnie Management manual: *Management guidelines*.

⁵ Coffein Compagnie Management manual: *Conflict management*.



REPORTING VIOLATIONS

SPEAK UP!

If you have any concerns or suspicions regarding a possible violation of our Code or a guideline of our management manual, please let us know. SPEAK UP!



Examples for violations are:

- Fraud
- Violations of human or employee rights
- Discrimination, harassment or mistreatment
- Infringements of competition law and rules
- Incorrect financial or non-financial record keeping
- Bribery or illegal acceptance of benefits
- Conflicts of interests in environmental, health and security matters
- Unlawful use of company resources
- Disclosure of confidential information
- Retaliatory measures against individuals who have trustfully expressed concerns.

Express your concerns towards your superior or a person of trust. You can alternatively report your concerns or your complaints to a compliance contact person via the trust hotline by phone from Monday to Friday. If you wish to talk to a female contact, please dial (+49 421 4101 103), and to a male contact, please dial (+49 421 4101 102).

You can also send an e-mail to

vertrauensstelle.w@coffein-compagnie.de (female)

or

vertrauensstelle.m@coffein-compagnie.de (male)

Each report will be treated confidentially. If you would like to file a complaint or draw attention to a possible violation, you should be willing to divulge your identity. Anonymous complaints are not desirable but will be noted and addressed.



 **COFFEIN COMPAGNIE**
REFINING GREAT COFFEE SINCE 1931.