

# Code of Conduct

Molkerei Gropper GmbH & Co. KG  
und Gropper Fruchtsaft GmbH & Co. KG

*for Employees and Business Partners*

Version 1 – March 2024

# I. Foreword by the Management Board

Dear Employees, Business Partners and Stakeholders,

We have reached another milestone in our sustainability strategy, and are pleased to present our updated Code of Conduct.

It is an important building block of our corporate identity that acts responsibly and sustainably, helping all employees, partners and other stakeholders to gain a common understanding of the values that determine our core actions. At the same time, it creates transparency about our position on social and ecological issues and how we integrate these into our daily actions.

As a dairy company, we see our responsibility as extending far beyond milk production. Thus, this Code of Conduct covers a variety of areas that are central to our business – in addition to the rights of our employees and our commitment to the communities with which we engage, this also includes aspects such as animal welfare and the careful use of our natural resources. It is both our aim and our ambition to be a leader in all these areas.

The dairy industry faces significant challenges in terms of environmental impact and sustainability. With this Code of Conduct, we commit to constantly re-examining our responsibility in all areas of sustainability, social, ecological and economic, and to continuously improving ourselves.

To this end, we formulate specific and ambitious goals, such as reducing our carbon footprint and improving our waste management. These goals are important not only for our company, but also for the future of our planet and future generations.

Our new Code of Conduct is our commitment to addressing these challenges and creating positive change. Compliance with it is crucial for all of us as we move towards a more sustainable future, and we expect active participation by all employees and stakeholders. We will carefully monitor compliance with these standards to ensure that our values are lived in every facet of our organisation.

This Code of Conduct is the result of extensive reflection and discussion across all areas of the company. The guidelines set out in it also follow internationally recognised conventions, above all the guiding principles of the UN Global Compact (Annexe), the ILO labour and social standards, the United Nations Universal Declaration of Human Rights and the OECD Guidelines for Multinational Business Enterprises.

We would like to thank those of you who have already accompanied us on this journey and those who will continue to do so in the future.

We remain available for your questions and suggestions.



Wolfgang Hoff  
Managing Director Marketing & Sales

## II. Fundamental standards of behaviour - These are our values



Both companies are committed to the principles of responsible and lawful conduct and oblige their business partners to respect the following principles and to ensure implementation in their own supply chain.

Within our companies, we act in particular according to the following principles:

- We respect and uphold human rights
- We as a company and each and every one of us is responsible for complying with applicable laws and internal codes of conduct.
- We are fully committed to the principles of fair and free competition as an elementary component of the market economy.
- In our business activities, no form of corruption is tolerated.
- We take for granted that business decisions are not influenced by private or personal interests.
- We safeguard and protect the confidentiality of sensitive information, data and business secrets.
- We demand and promote transparent business activities and partnership based on cooperation and trust.

Ethical business conduct is important to us in order to create and maintain a healthy and equitable environment for all. For that reason, we maintain rigorous internal processes to ensure that our associates adhere to the laws, regulations and industry codes of conduct that support good business practices.

The companies fulfil their environmental and social responsibilities based on the principles of the UN Global Compact (Annexe), the ILO conventions, the United Nations Universal Declaration of Human Rights and the OECD Guidelines for Multinational Business Enterprises.

We do not acquire, cultivate or utilise land, forests or waters where the use thereof secures the livelihood of one or more persons by unlawful eviction or confiscation.

Everyone in the company is responsible for complying with the principles contained in the Code of Conduct and all employees are expected to do the same, regardless of whether they are managing directors, senior or non-managerial employees, trainees or temporary workers.

The following principles represent the minimum standards for all employees in the company and managing directors.

For all actions that are not expressly listed in the Code of Conduct, but which jeopardise human rights and are clearly unlawful, we and our business partners and suppliers commit to taking appropriate measures promptly. This may include reporting such incidents to the relevant authorities, initiating investigations or implementing preventive measures. We endeavour to maintain our company integrity and legal compliance.

# III. Engaging with business partners



Companies expect their employees and business partners to act responsibly and to promote this expectation throughout the supply chain. Employees and business partners throughout the supply chain act in accordance with the applicable laws, particularly with regard to:

- Compliance with applicable anti-corruption laws.
- Compliance with applicable antitrust and competition laws.
- Compliance with applicable money laundering laws.
- Compliance with legal provisions in the area of export/import control.
- Avoidance of conflicts of interest.
- Non-acceptance or granting of gifts and other benefits, invitations and donations that go beyond what is customary.

As a company with integrity, we endeavour to work exclusively with business partners of similar integrity. We therefore expect our business partners to: conform to our values, to comply with applicable laws, to refrain from corruption, to observe human rights and labour laws, including laws against child labour, to take precautions to protect the environment, the health and safety of their products and animal welfare, and to demand corresponding regulations in their own supply chain, as well as to take appropriate measures to ensure this.

We expect our suppliers, external partners and service providers to undertake suitable and systematic activities, e.g. by participating in the BSCI initiative.

# IV. Engaging with our employees



Our company hires employees on the basis of documented employment relationships in accordance with the law.

The following principles apply in particular when engaging with our employees.

## **Anti-discrimination**

We treat our employees and business partners with fairness and tolerance. We reject unequal treatment on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, membership in trade unions or employee representatives, political opinion, religion or ideology, unless this is justified by the requirements of the employment. Unequal treatment that we reject includes, in particular, unequal pay for work of equal value.

In the event that an employee wishes to exercise their rights, we comply with the correct instruction and control of private and public security forces.

## **Working conditions**

Valuing our employees also means to us providing suitable workplaces that offer the highest level of safety.

All employees are required to comply with safety precautions and to report safety deficiencies and potential accident risks to their respective managers, so that appropriate precautions can be taken. Guidelines for preventive health care and the protection of oneself and others are to be complied with.

Employees under the influence of drugs, illegal substances or alcohol in the workplace pose a danger to the company, themselves and others. For this reason, their presence and consumption within the company is strictly prohibited and will be consistently pursued and penalised by means of disciplinary measures.

As part of a company agreement, we offer various support and assistance programmes for those affected.

In addition to acquiring knowledge, regular training courses are designed to promote awareness of fair interactions with one another, as well as respectful treatment of company property and the private property of other employees.

Companies provide their employees with machinery, equipment, IT, work clothing and much more for the performance of their work. Employees must treat the company property in a proper, responsible, careful and budget-conscious manner.

Employees receive appropriate remuneration. The statutory requirements regarding minimum wage, working hours and holiday entitlement are complied with.

Additionally, there are numerous voluntary benefits.

Child labour and any form of forced and compulsory labour will not be tolerated.

## IV. Engaging with our employees



We pay particular attention to and protect the very young among our employees and trainees.

Internal information must always be treated confidentially and may not be disclosed to unauthorised third parties. This confidentiality shall also apply beyond the termination of the employment or business relationship.

The use of confidential information for personal gain is not permitted.

We see leadership as being synonymous with taking responsibility for those employees entrusted to us. Every manager leads their employees by exemplary conduct and performance as well as by openness and their social skills.

We recognise the right of employees to assemble, to mobilise and to join a trade union. In doing so, we always strive for cooperation with the respective institutions based on openness and trust.

In the event that an employee wishes to report a violation of applicable law, of internal regulations or of human rights, such as discrimination, a digital reporting system, among others, is available to them.



## **Resource consumption and avoidance of environmental pollution**

In addition to the applicable local environmental laws, internationally recognised environmental standards are also respected.

The sites support a system, such as participation in SBTi, EMAS and ISO 14001, in order to systematically improve energy and material efficiency, reduce harmful environmental impacts and environmental risks and increase their legal certainty.

Throughout the entire supply chain, the aim is to prevent or continuously reduce environmental impacts such as resource and energy consumption, emissions of greenhouse gases and air pollutants, water consumption, land and water spillages and waste as far as is possible, and to preserve biodiversity and promote a circular economy.

This applies to all materials, both for our products and for consumables, technical goods and aids.

Water resources are used responsibly and excessive consumption is strictly avoided. The production sites do not cause harmful effects to the soil, nor do they lead to harmful noise, water or air pollution.

Wherever possible and economically feasible, we strive for continuous improvement. We strive proactively to use new and sustainable technologies and processes to minimise our impact on humanity and the environment.

We continuously drive the development of our products to improve their sustainability. We launch initiatives and implement measures to reduce material consumption, waste and pollution and to address global warming and climate change.

To this end, we set ourselves achievable, measurable environmental targets, which we evaluate regularly in order to take measures to achieve the targets where necessary.

In general, we expect our business partners to systematically address environmental issues from a strategic perspective. The aim here is for them to identify environmental risks themselves and to take measures to minimise them.