

ORIOR

EXCELLENCE IN FOOD

CODE OF CONDUCT OF ORIOR GROUP

EXCELLENCE IN FOOD

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1. We are ORIOR

"We are ORIOR" is based on fundamental company values such as a participative leadership style, open and direct communication, ethical and respectful business conduct and encouraging responsibility at all levels. ORIOR is proud of its cultural diversity in its various centres of competence. Motivated employees who take pride in their work and who assume responsibility for themselves and for what they do are the key for achieving the extraordinary.

2. Principles and objectives

All ORIOR Group employees act like entrepreneurs, conduct themselves respectfully and ethically in their interactions with stakeholder groups, and abide by local laws and internal directives. ORIOR promotes diversity and engagement, supports lifelong learning and employee development, and offers an attractive workplace and job security. ORIOR's declared goal is to steadily create value for all stakeholders. A solid financial basis is a key requirement. Market intimacy, strong partnerships, and a lean, agile group structure provide the framework for shaping the market at the cutting edge with innovative products, concepts and services. We pledge to provide uniqueness and top quality in order to be able to keep surprising consumers with enjoyable food moments. That is what our mission statement stands for: **Excellence in Food.**

All ORIOR Group employees follow and stand up for compliance with the rules of conduct outlined below. In turn, their good example positively influences the behaviour of their co-workers and business partners.

We call upon our business partners, consumers and shareholders to support us in implementing this code of conduct and thus creating a set of common values.

3. Employees

Employees who celebrate their craft with pleasure and passion while embodying entrepreneurship, ethics and respect in everything they do are crucial to ORIOR's success.

We strive for equality and a discrimination-free workplace in which all employees interact and work together free of prejudice. ORIOR does not tolerate discrimination, bullying or disrespect of any kind at the workplace.

ORIOR lives up to its corporate values on a daily basis. Employees know and respect the convictions described therein in their attitudes, actions and interactions with others.

"We are convinced that, each and every employee must assume full responsibility for their conduct and their work, and that our business conduct must be guided by high ethical standards and respect."

(excerpt from ORIOR AG core values)

4. Quality

The ORIOR Group delivers high-quality products that unflinchingly meet the very high standards of its customers as well as consumers. ORIOR has clearly designed quality assurance processes in place and implements them rigorously. Compliance is maintained through periodic internal and external audits.

5. Workplace health and safety

ORIOR takes pains to ensure a safe and healthy workplace and invests in suitable preventive measures and employee training. Health and safety are shared tasks common to all. Employees do everything they can to protect their own health and that of others. Measures to achieve this on the part of health and safety officers, corporate health management and in the context of the company-wide hygiene concept are upheld conscientiously.

6. The environment

Sustainability is part of our core business and a precondition for Excellence in Food. ORIOR takes responsibility at every stage of the value chain and addresses the interests of all stakeholder groups equally and its operations are in accord with the principles of sustainability. Bearing economic, ecological and social factors in mind,

ORIOR is committed to constant improvement on a holistic basis. Core issues are sustainable sourcing of raw materials, facilitating employee development, responsibility for the environment and respect for animals.

Sustainability is firmly anchored in ORIOR's strategy as a strategic mainstay in its own right and we consider it to be an integral part of our operations. Thus, sustainability is present in all we do and who we are.

7. Integrity

Honesty in interaction among business partners, employees, shareholders, investors and other stakeholders is essential for solid, long-lasting business relationships. ORIOR Group selects all its partners based on fair terms and conditions. Decisions are founded on objective criteria such as price, quality, service performance, reliability and integrity. ORIOR condemns bribery and corruption in all its forms. No employee may directly or indirectly offer, provide (to business partners, private individuals, public agencies or institutions) or accept unfair advantages (including bribes and kickbacks), whether in the form of cash payments or other benefits or favours. Nor may employees accept inappropriate gifts or invitations from a business partner (see "Group policy on gifts and benefits").

"We are convinced that, unremitting efforts towards the attainment of superior quality and constant advancement in our daily work are a precondition for sustainable and profitable growth."

(excerpt from ORIOR AG core values)

8. Legal compliance

Compliance with all applicable and relevant laws and ordinances, in particular those pertaining to product quality, food safety, environmental standards, workplace safety and health, as well as with all labour laws is mandatory. ORIOR Group also complies with antitrust and competition laws (including anti-money laundering laws). In addition to this code of conduct, ORIOR Group's internal rules, regulations and directors continue to apply. Furthermore, all employees are required to comply with all legal requirements applicable to the performance of their function at all times.

9. Due diligence, confidentiality and insider information

All employees are required to maintain strict confidentiality in regard to any internal ORIOR affairs that ORIOR has not made public. These include, without limitation, business and manufacturing secrets, intellectual property and know-how, and internal reporting (financial data). Our employees protect these ORIOR assets from harm and unauthorised access by third parties.

As a listed company, ORIOR and employees with access to the relevant information are subject to insider trading regulations. Trading in ORIOR shares based on advance knowledge or confidential

information that could have a material impact on ORIOR's share price is not allowed. It is prohibited to pass on such information to third parties before it become available to the public. Persons who violate these basic principles will be prosecuted.

10. Responsibilities, violations and sanctions

Compliance with this code of conduct is mandatory for all employees. Employees must report any incidents or activity which they believe are in violation of applicable laws, rules, regulations or this code of conduct. Violations of any kind whatsoever compromise the integrity and credibility of the ORIOR Group.

Reports should be directed to the line manager, the HR department of the unit involved or to the CFO of ORIOR Group. All documents will be kept confidential. Such reports will not result in any disadvantages for the reporting person, unless violations of their own are involved. For that reason, the "internal auditors" will also investigate whether there are any indications of misconduct during the course of their audits.

The Management Board, or if necessary, the Board of Directors, will determine the appropriate disciplinary action.

"We are convinced that, the company needs content employees, customers, suppliers and shareholders to achieve its goal of steady value creation."

(excerpt from ORIOR AG core values)