

ORIOR



EXCELLENCE IN FOOD

Our new Code of Conduct



Dear employees,

Since spring 2021, ORIOR has a new Code of Conduct. It outlines our most important common values and rules of conduct and reflects our understanding of responsible conduct. Not only between us employees of the ORIOR Group, but also in cooperation with our business partners.

What does this Code help us with?

- We understand what we may **expect** from others and what the expectations on **ourselves** are.
- We have a **common understanding** of what we stand for as ORIOR and what **responsibility** means to us.
- The rules of conduct **enrich** our everyday work and strengthen our pillar «WE ARE ORIOR».

Please read the summary and the examples in this presentation carefully. You can find the whole code in the [Beekeeper app](#) and as well on our [website](#).

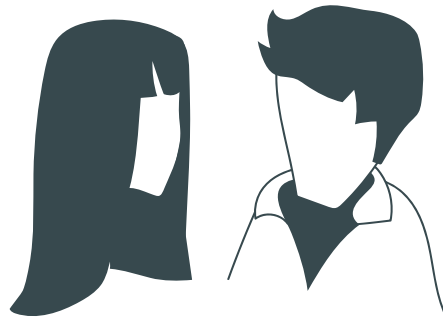
I count on you and thank you for the cooperation,
Daniel Lutz



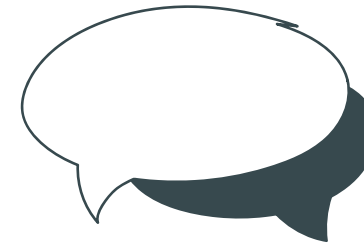
1 Basic rules of conduct



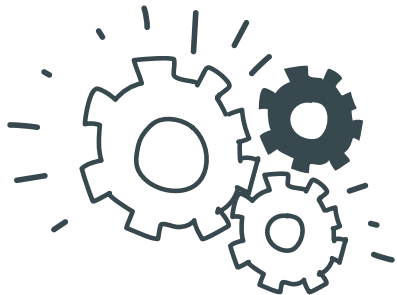
We act in an entrepreneurial manner.



Our dealings are honest and correct.



We communicate openly and directly.



We take responsibility.



We behave respectfully.



We comply with laws, policies and this Code of Conduct.

2 Quality standard

- Manufacturing of premium-quality products.
- Uncompromising standard for product quality and safety.
- The highest quality requirements of both our customers and consumers are our focus.
- Clearly defined quality assurance processes.

This is how I act:

- ✓ Consistently advocate and exemplify quality and food safety.
- ✓ Compliant with hygiene rules, processes and procedures.
- ✓ Report impurities and quality problems.



3 Responsibility towards people and the environment

- Respectful treatment of the environment and resources.
 - The topics of energy efficiency, combating climate change, water conservation and the reduction of food waste are essential for us.
 - All employees share responsibility for this.
- Respect for human rights is part of our corporate culture.
 - We all respect the rights of our fellow human beings.
 - e.g. equality, freedom, right to freedom of expression, protection of privacy.

This is how I act:

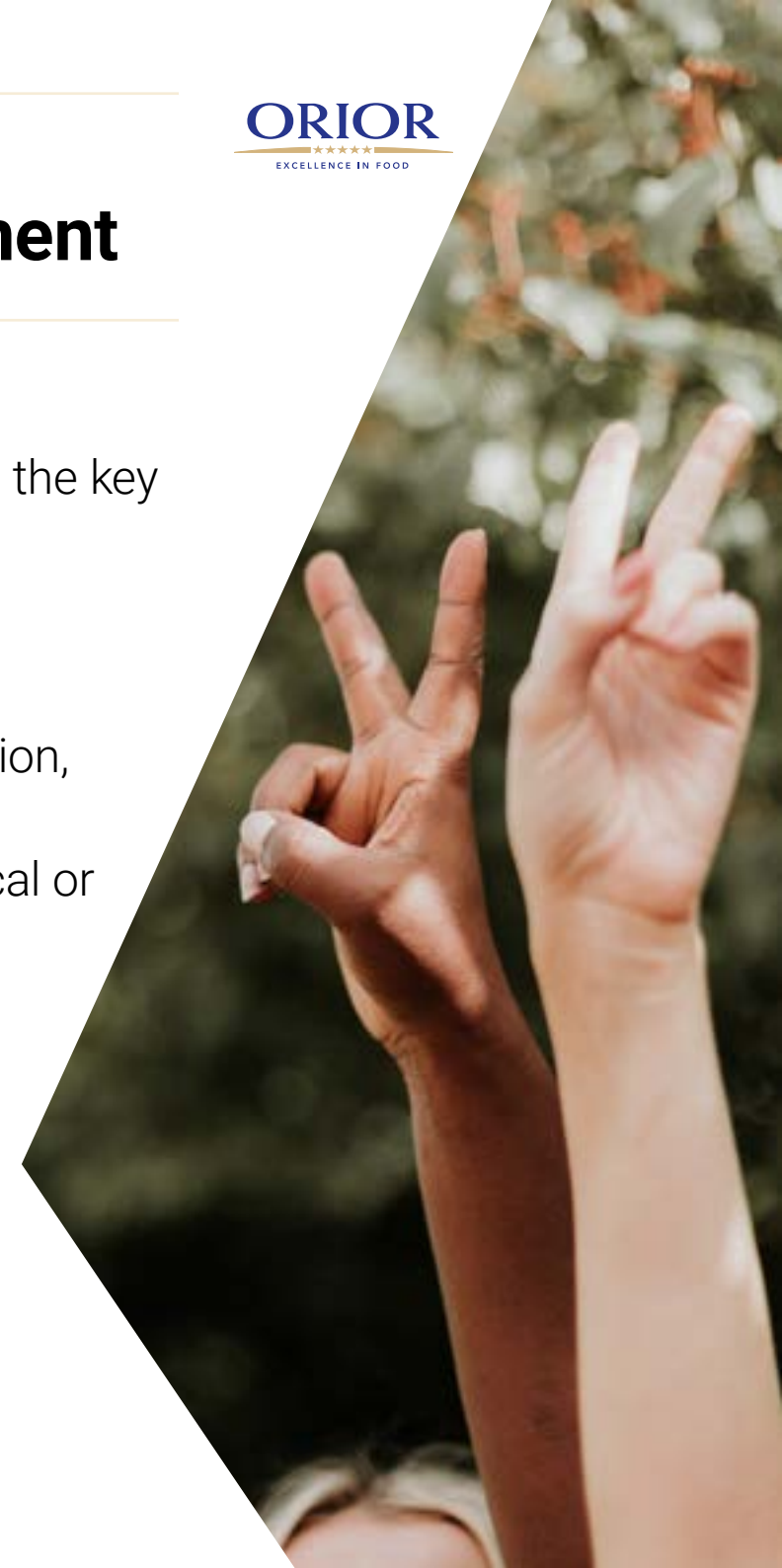
- ✓ I use resources sparingly, be it food (waste), water or fuel.
- ✓ I use public transport/bikes instead of cars/motorbikes wherever possible.
- ✓ I am not discriminated against and do not discriminate against others.



4 **Safe and respectful working environment**

1

- Employees
 - Entrepreneurial, passionate and respectful employees are the key to ORIOR's success.
 - Attractive working conditions.
- Zero tolerance for discrimination, bullying or disrespect
 - e.g. based on gender, age, nationality, race, sexual orientation, disability, political opinion, etc.
 - We do not tolerate harassment, whether it is verbal, physical or visual.
- Equal opportunities should apply everywhere
 - e.g. also in recruitment, further development, etc.



4 Occupational safety and health

2

- We promote a safe and healthy working environment – for our employees and all third parties on our premises.
- Our safety culture: Every accident is one too many.
- Leaders/supervisors live the safety concept as a role model.
- Personal responsibility of the employees:
Stop in case of danger – eliminate danger – continue working.

This is how I act:

- ✓ Consistently follow safety rules and only carry out work for which I have received a safety training.
- ✓ React immediately in unsafe situations.
- ✓ Never work under the influence of alcohol or drugs.
- ✓ Always have the **safety manual** within reach.

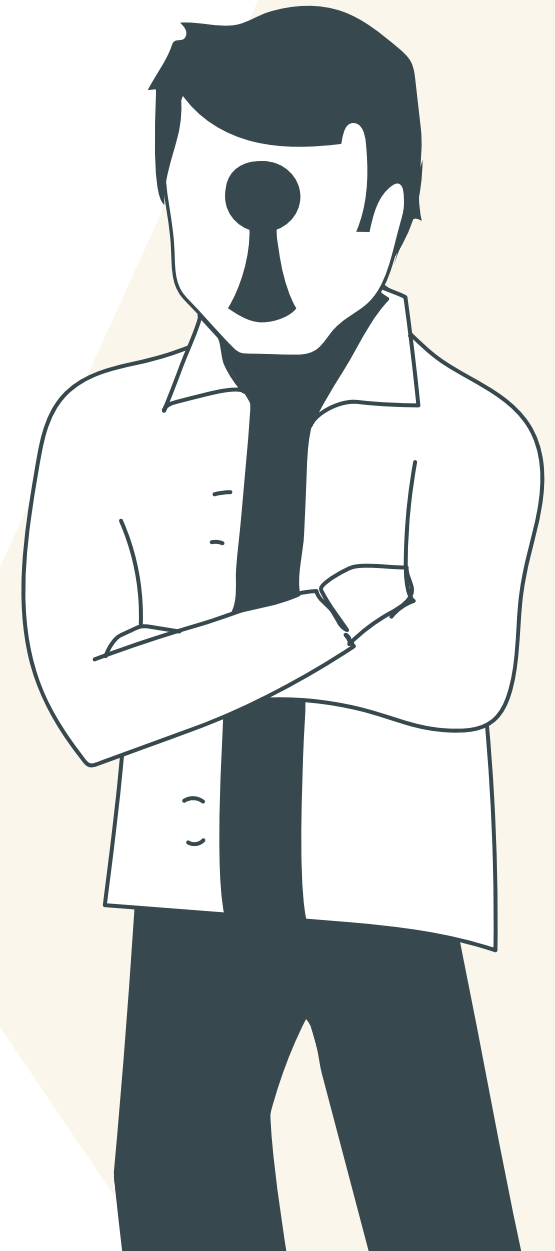
Principles

Prevention
Personal responsibility
Effective organization
Training



5 Ethical business conduct

- Strict confidentiality regarding internal matters, e.g. manufacturing secrets, internal know-how, business figures.
- Prevent conflicts of interest between private and business. If a conflict of interest nevertheless arises: disclose internally.
- Prohibition of trading in ORIOR shares on the basis of advance knowledge/confidential information.
- Select business partners under fair and objective conditions. Do not enter into cartels/price fixing; this is illegal.
- Zero tolerance for bribery and corruption, receiving or giving bribes.
- Accept gifts only within reasonable limits (see corresponding [guideline](#)).
- ORIOR does not donate funds or non-cash assets directly or indirectly to political parties, candidates, office holders or party-affiliated foundations.



6 Responsibilities, violations and sanctions

- Fully comply with laws, regulations and this Code of Conduct.
- An employee identifies something that constitutes a violation of the code, the law or internal policies: Report to one of the following:
 - Supervisor, HR, CFO of ORIOR Group
 - Anonymous and confidential via [SpeakUp](#)
- Failure to comply may result in disciplinary/contractual action.

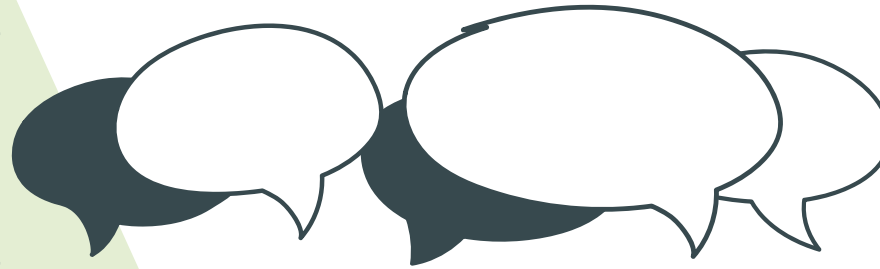
Examples of cases to report:

- ✓ I suspect that contractual agreements were not based on objective decisions or that bribes were paid.
- ✓ I find that someone from my company is committing serious security violations.
- ✓ I feel discriminated against, bullied or harassed.



Code of Conduct

SpeakUp!



What

- Anonymous reporting system for complaints and violations against the Code of Conduct.
- Online and by phone.
- Anonymous and confidential (neither names nor contact info need to be provided).
- Available in many languages.
- Cases are individually examined/investigated ...
- ... an anonymous dialog will be started with you ...
- ... you will be informed about the result anonymously.

For what

- Reporting conduct that is unethical or violates the Code of Conduct.
- Cases involving yourself and your rights.
- Cases that could harm ORIOR.
- NOT for product and customer complaints.

Where

- Online at:
[SpeakUp Portal](#)
- By phone at:
 - Switzerland: 0800-561422 (Code: 52072)
 - Belgium: 0800-71365 (Code: 52072)
 - Germany: 0800-1801733 (Code: 52072)
 - France: 0800-908810 (Code: 52072)
- More information in the FAQ: on [Beekeeper](#)

The ORIOR Code of Conduct – also YOUR Code!

The rules of the Code of Conduct are binding – everyone abides by them.

We all live the values that the Code of Conduct internalizes and integrate them into our culture.

Do your part to live up to the Code – in your daily work and also in the exchange with your team colleagues.

If you notice unethical behavior, talk about it either with the people involved, their superiors, HR, or anonymously via SpeakUp.

