

Code of Conduct



Code of Conduct

Shared rules for a positive collaboration

As an employee of Nordzucker you are part of a leading global producer of various sugar products from beet and cane as well as feed, molasses and bioethanol. We owe our success not only to our high level of professional expertise, but also to our company culture and our values. Our behaviour determines how the world sees us. At Nordzucker we all act based on the same four values (responsibility, dedication, courage and appreciation). Our values form the foundation of our group-wide Code of Conduct. The Code of Conduct guides our decision-making, how we act throughout Nordzucker and is the basis for our good reputation.

Why do we need such rules?

Living and working together requires reliability and trust. Since Nordzucker is an international company, different cultures, ideals and opinions of what is right and wrong come together. Therefore, it is all the more important to develop a common understanding of ideals, opinions and what Nordzucker stands for. We have outlined this common understanding in our shared Code of Conduct.

For Nordzucker, it is essential that we comply with legal and regulatory requirements in order to safeguard our business and maintain our good reputation. Therefore, we expect from all our employees (members of the respective management and corporate bodies, managers as well as all other employees of Nordzucker) to fully comply with the content of this Code of Conduct, which forms the basis for further compliance rules and principles at Nordzucker.

This Code of Conduct not only refers to national and international laws but also contains general rules of behaviour which are relevant in our daily business. In a large and international company, it is even more important that we make our common regulations transparent and that we inform our employees about them in order to generate a common understanding and provide training. This Code of Conduct also underscores our commitment to the UN Global Compact and its principles on anti-corruption, ethics, human rights and environment. We uphold and implement these principles in our everyday work, through our values and this Code of Conduct. Our values are particularly important in cases where the Code of Conduct does not provide sufficient guidance. Here, you will need to refer back to the values and use your common sense and good judgement to ensure we are continuously operating under the spirit of the Nordzucker Code of Conduct.

This Code of Conduct applies to all countries in which Nordzucker operates. In the event of a conflict between local law and this Code of Conduct, local law shall prevail.

Why does the behaviour of each employee matter?

We are all representatives of Nordzucker and act on its behalf – each within our own area of responsibility. Together, we must meet the demands of our customers, comply with applicable laws and our applicable internal binding rules. This is an integral part of Nordzucker's culture and success.



Dr. Lars Gorissen:
Chief Executive Officer (CEO)

» To maintain and strengthen our good reputation and cooperation, we have set down in our Code of Conduct our group-wide principles, which are essential for all our business activities and binding for all of us. In particular the clear Compliance rules serve to create and maintain a working environment and company conduct that promotes integrity, respect and fairness.«

Alexander Bott
Chief Financial Officer (CFO)

» Our four values, namely responsibility, dedication, courage and appreciation, guide us in our daily business and they are the basis for our Code of Conduct. Our Values and the Code of Conduct are our guiding principles, they determine how we interact with each other and they are an integral part of our company culture.«



Alexander Godow
Chief Operating Officer (COO)

» Sustainability is an essential part of Nordzucker's identity. An elementary part of our sustainability targets are the social targets, being a responsible producer, employer and partner. It's about balancing social, environmental and economic impacts along the entire value chain, built on the fundament of our Code of Conduct.«

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We are committed to ethical behaviour

Nordzucker stands for ethical and legally compliant behaviour. Everyone at Nordzucker is obliged to comply with national and international laws in all of our business activities. In addition, also internal and external regulations and principles, our shared values and the content of this Code of Conduct apply.



› We do not receive or give bribes

We do not tolerate any form of corruption at Nordzucker. Offering, giving, requesting or accepting advantages of any kind or anything of value is prohibited, if it influences a decision-making process in an inadmissible way. This applies to all employees at Nordzucker as well as for third parties.

Benefits in the business environment such as gifts or hospitality must comply with social customs and must be transparent. They must never lead to an inadmissible influence of a business decision or create such an appearance.

Extreme caution is required in the case of benefits to public officials. These are only permissible in very narrow exceptions. As a result, we apply the following principle: Our employees do not grant benefits to public officials.

When it comes to donations and sponsoring, we also pay attention to transparency and a socially, customary and appropriate framework in order to avoid even the appearance of corrupt behaviour.

› We avoid conflicts of interest

Business decisions must not be influenced by private interests. Situations must be avoided in which own private interests or the interests of parties with whom an employee has a close relation are in conflict with Nordzucker's interests.

Here are some examples that potentially could create conflicts of interest:

- Secondary employment or self-employment, such as a secondary employment with a Nordzucker business partner (customer, supplier) or a job as a consultant for a Nordzucker business partner
- Private investments, such as a shareholding of more than 5 per cent or another significant financial interest in a business partner of Nordzucker
- Certain close relationships (such as a spouse, sibling, parent, life partner, close relative or other close relationships) with other Nordzucker employees or with business partners of Nordzucker
- Close relationships with an auditor who is responsible for our certifications

Conflicts of interest must be made transparent. If an actual or potential conflict of interest occurs, such circumstances must be reported to your superior immediately.

Nordzucker's anti-corruption regulations and recommendations for the right way of dealing with corruption issues, conflicts of interest and handling of our properties and assets are set down in our guideline **Compliance Anti-Corruption**.

› We act fairly in competition

We are committed to the rules of the market economy and freedom of competition. All employees must comply with antitrust law and competition law.

Agreements or conduct which have the purpose or effect of impairing competition are prohibited. This applies in particular for the coordination with competitors with regard to prices or tenders, the exchange of confidential information and the division of orders, customers, markets or territories.

Unfair trading practices are also forbidden. This includes misleading business statements, the improper influencing of business decisions of business partners as well as disparaging or untrue statements about competitors.

Further information on how you can avoid antitrust infringements, are set down in our guideline **Compliance Antitrust Law.**

› We treat Nordzucker's property and assets with care

Nordzucker's property and assets are essential for us to achieve our business aims. We treat Nordzucker's property and assets – including intellectual property – with due care. We expect all of our employees to protect our property and assets from loss, damage, misuse, theft, misappropriation and destruction.

› Communication and transparency are important to us

Our reporting is proper, correct, accurate, timely, complete and transparent. We communicate in a timely manner and want to inform, not to confuse. We stand for truthful, transparent and reliable reporting within Nordzucker and beyond.

› We protect trade secrets and personal data

We protect all business information as well as information from and about our business partners and treat such information with confidentiality. The obligation of confidentiality applies to our intellectual property such as trade secrets, patents, trademarks and copyrights, as well as to technical data and all other unpublished business information.

Compliance with the relevant data protection regulations is very important to us. All personal data relating to employees, customers, suppliers, other business partners and other third parties are used and treated confidentially and only in full compliance with the relevant data protection regulations.

More information about the basis on which we process personal data, which rights data subjects have in connection with the processing of their data, what our data protection strategy looks like and how we implement it, are set down in our guideline **Data Protection**.

› We do not tolerate money laundering

We do not tolerate any activities connected with money laundering. We only conduct business with business partners that also comply with the relevant laws and obtain money from legal sources.

Money laundering means that the origin of illegally obtained money, e.g. from terrorism, drug trafficking, organized crime or other criminal offenses, is disguised by smuggling it into the legal economic cycle, thereby creating the appearance of legality.

› We comply with trade control and tax regulations

Nordzucker complies with the relevant trade control regulations. No goods or services are supplied to countries, persons or organizations subject to an embargo.

Furthermore, we strive to meet all our tax obligations in full, in due time and correctly in all relevant jurisdictions. All relevant tax laws, regulations and rules are obeyed and reporting duties and disclosure requirements are fulfilled.

Focussing on people

Nordzucker is aware of its social responsibility as a leading international operating company. At Nordzucker, our employees play the most important role in the success of our business. We are dedicated to comply with human rights and strive to create a diverse, safe and healthy working environment.



› We respect human rights

We implement the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises across all our activities and expect from our employees and business partners to do the same. We do not accept forced labour, child labour, human trafficking, the exploitation of employees and any other violations of labour rights and human rights.

› We stand for diversity

Integration and diversity are an essential part in our day-to-day business and our culture. We do not accept any form of discrimination, harassment, bullying, mobbing or intimidation. All people are treated equally and fairly irrespective of, for example:

- Ethnical or national background
- Religion or ideology
- Political views
- Trade union involvement
- Social class
- Gender and sexual orientation
- Age
- Disability, physical appearance, and illness

Respectful and tolerant interactions with one another in our day-to-day work is very important to us and represents an essential factor in our cooperation with colleagues and business partners. Different ideas, perspectives and skills improve the quality of our work and ensure our long-term success. We want to benefit from social diversity, different languages, cultures and lifestyles. As a result, we encourage employees from different countries and cultures to get to know each other and to exchange ideas.

› Nordzucker is a fair employer

We respect and protect the right of our employees to form representative bodies and associations and to participate in collective bargaining regarding working conditions and wages. All of our employees are compensated in accordance with national living wage standards and working hours are in line with national legislation. We support the work-life balance of our employees and offer flexible working conditions wherever possible.

We respect the right of freedom of expression and the protection of personal rights and privacy. We establish an environment where there is mutual trust and respect, and where open dialogues, communication and feedback is encouraged.

› We want you to stay safe and healthy

We are committed to the highest safety and health standards for our employees and for anyone working either for us or with us. Promoting a safety-conscious culture is a high priority for us. It is part of our culture to take responsibility for our own safety and health and to take care of our colleagues. Our workplaces and personal protective equipment meet the highest standards. Furthermore, we emphasize risk awareness and strive to prevent occupational incidents by conducting business in a safe manner and free from harmful substances that could impair our job performance.

To learn more about which measures Nordzucker has implemented to comply with human rights and to create diverse, safe and healthy working environments, please refer to the following policies:

- **Supplier Code of Conduct**
- **Sustainable Procurement Policy**
- **Human Rights Policy**
- **Safety & Health Policy**

We protect the environment and climate

Environmental sustainability, climate protection and the efficient use of resources are an essential part of our business activities. We have a very own interest in keeping the environment and the climate in balance. We are continually working to reduce our resource consumption both at our plants and along the supply chain in order to minimize our negative impact on the environment and the climate. We all have the responsibility to treat natural resources with care and to contribute to the protection of the environment and climate through our individual behaviour.



› We contribute to climate change mitigation and adaptation

We are continuously working towards decreasing the greenhouse gas emissions of our operations and value chain. We are all responsible for reducing our energy consumption and making our processes more efficient and greener. We make the climate impact of our products transparent, set ourselves ambitious and credible targets and report our energy consumption and emissions on an annual basis. Furthermore, we are actively working on climate change adaptation, adjusting to current or expected effects of climate change. We are always assessing different and location-specific adaptation solutions to prevent or reduce climate risks to our plants, the public and our growers.

› We preserve natural resources

We strive to keep our need for natural resources as low as possible and apply the principles of a circular economy. In order to limit our waste and water consumption, we strive to use every part of our raw materials, beet and cane. We minimize water consumption by reusing the water in our processes as much as possible. Where possible, we use the wastewater as irrigation for the fields. In addition, we are reducing our packaging needs, work towards full recyclability and promote an effective waste management.

› We promote biodiversity

Our most important raw materials come from nature. We work in close collaboration with our growers in order to minimize any negative impact on biodiversity and to support regenerative agriculture practices. Promoting biodiversity is an integral part of our sustainable sourcing strategy. We obtain our raw materials from areas where there is no deforestation.

For further information on how Nordzucker protects the climate and the environment, please refer to the following policies:

- **Energy and Environmental Policy**
- **Sustainable Packaging Policy**

We are part of the whole

At Nordzucker, we have the outmost respect for our communities, growers and business partners. They play an essential role in the success of our business and therefore, inclusive, transparent and honest stakeholder engagement is important to us. The same principles apply to authorities and public officials, and the partnerships and associations of which Nordzucker is a member. We listen to any concerns our stakeholders might have and fulfil our responsibilities to the communities in which we operate, including minimizing impact during operation of our facilities, respecting land rights, protecting the rights of indigenous people, and supporting local cultures and traditions.



› Nutrition and health are important to us

We contribute to the nutrition debate based on scientific facts on the role of sugar in a balanced and healthy diet. We promote responsible marketing and communicate about our products accurately, transparently and truthfully.

For further information on Nordzucker's role in the debate surrounding sugar and nutrition, please refer to our **Sugar and Nutrition Policy**.

› We act with trust and respect

Our relationships with our stakeholders are fair, positive, productive and always based on mutual trust and respect. Our growers and suppliers are our partners, who we treat fairly and with whom we maintain partnerships based on trust. We are committed to supporting them in their efforts to continually improve their sustainability performance. At the same time, we commit our growers and suppliers to the same standards to which we ourselves adhere. Our suppliers are obliged to comply with the sustainability requirements set out in the Supplier Code of Conduct and are measured by their compliance with these requirements.

To learn more about the requirements and standards Nordzucker has set forth in its Supplier Code of Conduct for its suppliers regarding business ethics, human rights, labour rights, environment and social engagement, please click **here**.

› We are committed to quality

We always treat our customers with respect, fairness and honesty. We maintain the trust of our customers and consumers by ensuring the highest quality, hygiene and product safety standards throughout the entire value chain – from the procurement of ingredients to manufacturing and transportation to the consumer. Our employees have the responsibility to maintain our quality promise and improve our product quality on an ongoing basis through their individual behaviour.

For further information on Nordzucker's quality commitment please refer to our **Quality and Product Safety Policy**.

› We are transparent about lobbying

We are actively involved in various associations and activities connected with national and international policy formation and report transparently on our memberships and aims. We always follow national regulations concerning lobbying and political engagement.

Grievance procedure and whistleblower system

We encourage all our employees to address and report any violations of this Code of Conduct. In many cases your reports help us to expose misconduct and ensure the sustainable success of Nordzucker and the wellbeing of employees and other stakeholders.



› Dealing with violations of the Code of Conduct

All reports of concerns, misconduct and violations of Nordzucker's Code of Conduct will be taken seriously, reviewed and investigated effectively and in a timely manner. If needed, relevant stakeholders will be asked to cooperate fully and truthfully during the internal investigations. Nordzucker will do the maximum possible to ensure accountability and provide effective remedy to any violations.

As an employee of Nordzucker you have different ways to speak up or to report a concern or a complaint, e.g. via email, letter, physical meeting, telephone call or online via our whistleblower system SpeakUp. You can report any violations or suspicions immediately to one of the following contact partners:

- Plant Manager or direct superior
- Members of the Compliance Organization (Compliance Coordination, Local Compliance Coordinators) or
- Use of the anonymous whistleblower system **SpeakUp** (web application and telephone hotline)

Business partners and other third parties also have access to the anonymous whistleblower system SpeakUp.

We treat every report confidentially and ensure that it is only accessible to the people involved in its investigation. We clarify all information reported to us objectively and under presumption of innocence. We never retaliate against whistleblowers and we protect those that raise issues with us. No

employee of Nordzucker or third party reporting possible or actual compliance violations to the best of their knowledge and belief shall suffer any disadvantage from Nordzucker as a result of the report. Information from employees who were involved in compliance infringements and avert damage to Nordzucker through their voluntary reporting will be considered in favour of the respective employee.

If Nordzucker's values are concerned, please contact the Ethics Committee.

› Consequences of compliance violations

Any employee who violates this Code of Conduct must expect consequences under labour law and / or civil law.

› If you have any questions

If you have any questions or suggestions about compliance at Nordzucker, the interpretation of the Code of Conduct or other doubts about compliance-relevant topics, please contact the function Compliance Coordination at Nordzucker at any time. We have provided the contact details below:

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