



# RESPONSIBLE TOGETHERNESS

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**Code of Conduct of the Uelzena Group**

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! There is no better place and no better time to reliably shape togetherness than here and now.

### SCOPE

This Code of Conduct defines the common rules, principles and values of the Uelzena Group. The Group includes Uelzena eG, H. Schoppe & Schultz GmbH & Co. KG, Hoche Butter GmbH, Altmark-Käserei Uelzena GmbH and WS Warmsener Spezialitäten GmbH.

The Code of Conduct forms the basis for all business activities and decisions and is based on the ten principles of the United Nations Global Compact (UNGC). Based on defined standards, it should prevent wrong decisions and support the implementation of the rules and principles outlined in the following. It does not replace existing work instructions or guidelines, but rather serves as guidance on how to behave on a day-to-day basis at work. At the same time, this means that infringements of the Code of Conduct will not be tolerated.

The Code of Conduct applies to all employees of the Uelzena Group, as well as to the Management Board and the Supervisory Board of Uelzena eG. In addition, this Code of Conduct also applies to our business partners, as we aim for it to express Uelzena's expectations regarding the ethical and legal aspects of our cooperation.

## FOREWORD BY THE EXECUTIVE MANAGEMENT

### “How should I behave in a particular situation?”

is not only a question we need to ask ourselves in our private lives, but also in our professional lives as an employee or business partner of the Uelzena Group. **Our Code of Conduct** is our commitment to impeccable ethical, legal and commercial behaviour. The guidelines are based on our values and our responsibility as a cooperative company. It is not possible for this Code of Conduct to cover every conceivable situation and it is intended to serve as a guide to promote responsible behaviour. For these reasons, it is all the more

important that we are all familiar with and understand this Code of Conduct, and live and breathe its values in our daily work and action. Every single employee represents our company group in their external behaviour. Not only can infringements harm the individual employee or the company, but they can also harm the external reputation of the entire Uelzena Group and its cooperative member dairies. If you ever have any doubts, questions or suggestions, you can contact your manager or speak directly to the executive management in confidence.

  
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## FUNDAMENTAL BEHAVIOUR

### Compliance with laws and internal guidelines

The applicable laws and standards of the countries in which the Uelzena Group operates will be observed and complied with in all business activities and decisions. The same applies to observing and complying with Uelzena's internal guidelines and requirements.

„ We obey legislation in all our business activities.

### Mutual respect and prohibition of discrimination

In the Uelzena Group, we maintain open communication and mutual respect in our interaction with one another. Any kind of discrimination based on race, ethnic origin, skin colour, nationality, gender, age, religion or world view, disability, sexual orientation or other characteristics protected by law contravenes Uelzena's principles and will not be tolerated. We oppose any form of discrimination, harassment or bullying.

### Relationship with employees

The Uelzena Group strives to recruit, train, retain and promote skilled employees, who act independently and responsibly. The Group is committed to equal opportunities as well as compliance with transparent recruiting practices. We respect the right to fair pay, which takes into account any applicable collective labour agreements and the legal minimum wage, employee performance and the relevant labour market. Child labour or any form of forced labour are not tolerated. The Uelzena Group also expects its business partners to comply with international social standards that are based on the Ethical Trading Initiative (ETI) Base Code.

„ We respect human rights and are committed to equal opportunities.

### Occupational health and safety

As a responsible employer, the Uelzena Group considers it a top priority to offer a safe working environment that contributes to avoiding accidents and work-related illnesses. It goes without saying that the Uelzena Group complies with existing

laws and works continuously to improve and promote occupational health and safety. All employees contribute to this by observing safety requirements and highlighting potential hazards.

„ We ensure occupational health and safety in the workplace.

### Freedom of assembly and association

The Uelzena Group recognises the right of its employees to assemble, organise and join trade unions of their choice. It engages in an open and trusting cooperation with the democratically legitimised employee representatives and commits to maintaining a constructive dialogue and striving for a fair balance of interests.

„ We respect the freedom of association and engage in a constructive dialogue.

### Ban on granting or accepting an undue advantage

Granting or accepting an undue advantage (corruption) shall not be tolerated regardless of its form and content. Invitations, gifts and other donations may only be made or accepted within reasonable limits as defined by the management. Business relationships are initiated or maintained purely based on objective criteria. All other courses of action are a violation of this Code of Conduct. Whether these decisions were made for the benefit of the Uelzena Group or third parties is irrelevant in this regard.

„ We refrain from any form of granting undue advantages or corruption.



„ We address each other and our business partners with respect, fairness and tolerance.





## RELATIONSHIP WITH BUSINESS PARTNERS & THIRD PARTIES

### Competition and anti-trust law

The Uelzena Group competes with other companies on procurement and sales markets. Competitors are treated fairly by the Uelzena Group and within the scope of legal regulations. Employees are prohibited from the following:

- Releasing information to external parties on prices or other sales conditions, costs of production, sales volumes or other sensitive data that is not disclosed within the scope of identifiable contract negotiations.
- Making arrangements with competitors so as to exclude other potential competitors from the market or to boycott specific suppliers or competitors to gain an advantage.
- Influencing the resale price of products of the Uelzena Group.
- Acquiring sensitive information on competitors through theft, bribery or by communicating incorrect or adulterated data or conducting any other illegal activities aimed at gaining a competitive advantage.

**” We promote fair competition and abide by legal requirements.**

### Relationships with customers and suppliers

Within the Uelzena Group, relationships with customers, suppliers and service providers are based on fair contracts and cooperation in good faith. Honesty in business relationships and upholding agreements are part of the Uelzena Group's core values. Customers should have access to the information they require to arrive at an objective and commercially sound decision. Complaints are handled impartially within the Group and resolved transparently, taking into account the relevant and applicable laws and regulations.

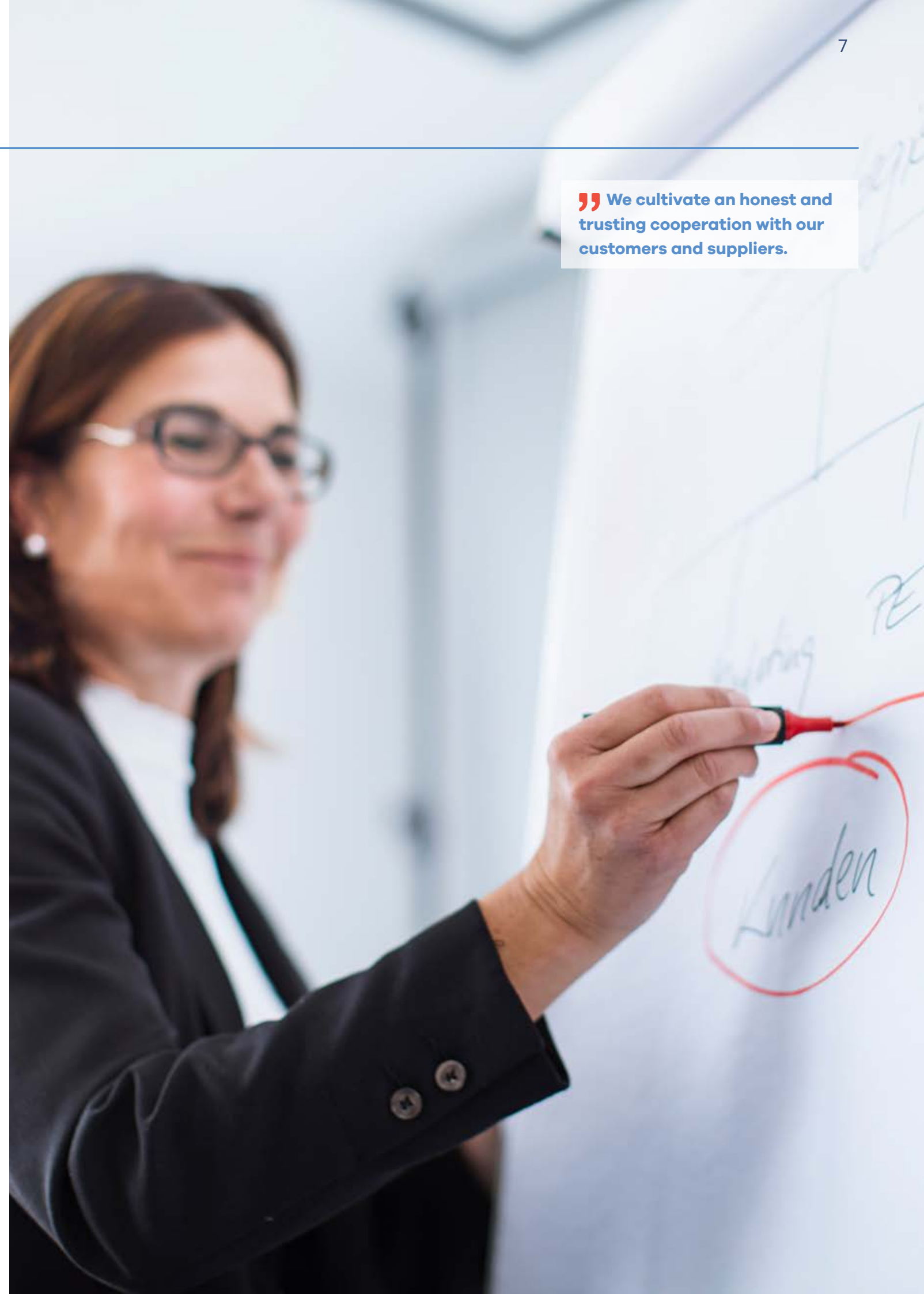
### Expectations placed on business partners

The Uelzena Group also expects its business partners to comply with the applicable laws. This means that all business partners, in addition to observing labour and human rights, must also comply with the applicable laws on corruption. We expect them to take extensive measures to protect the environment and other relevant sustainability measures and also to require the same from their own supply chain. To embed these requirements in their own supply chain, the Uelzena Group asks their suppliers to provide a self-disclosure. Additional certificates should be provided for raw materials and packaging materials that come from risk countries according to the BSCI classification.

**” We expect our business partners to act in accordance with this Code of Conduct.**



**” We cultivate an honest and trusting cooperation with our customers and suppliers.**







**» We handle company and intellectual property responsibly.**

## INTERNAL RIGHTS AND RESPONSIBILITIES

### Handling the property of the Uelzena Group

Employees of the Uelzena Group handle the property of the Uelzena Group responsibly, with care and in a cost-conscious way and avoid damaging this property. As an innovative company in the food industry, our expertise, patents and property rights are crucially important. Work resources and business documents must not be used for private purposes nor passed on to third parties. Press and media enquiries are generally only responded to following consultation with public relations department or management.

### Data protection, privacy and IT security

Personal data of employees and business partners of the Uelzena Group is only collected, processed and used in accordance with legal regulations. Confidential information forwarded by business partners is kept confidential and only used for the agreed purpose. Vice versa, the Uelzena Group also expects its business partners to keep sensitive information confidential and only use it for the agreed purpose. Information protection is also part of IT security. This ensures that confidential information is not forwarded to unauthorised persons, access rights are organised responsibly, and passwords are kept secret. The details are regulated in the internal data privacy guidelines and social media recommendations. All infringements or any suspected violation of the data protection regulations must be reported immediately.

### Avoiding conflicts of interest

The interests of customers and business partners are of high priority to the Uelzena Group. In principle, the Uelzena Group endeavours to avoid conflicts of interest and to recognise and resolve any emerging issues at an early stage. Private and business interests are kept strictly separate. An individual's own position in the company must not be abused for their own benefit or for the benefit of their family or friends. Business partners must not gain any privilege as a result of private interests.

**» We protect personal and confidential data.**



**» We avoid conflicts of interest and actively resolve them.**



## RESPONSIBILITY TO THE ENVIRONMENT

### Environmental protection

As part of the food industry, the Uelzena Group is aware of its particular responsibility in handling natural resources. Its objective is to continuously improve the environmental footprint of the processes and products. The Uelzena Group aims to reduce the emissions of undesired substances into the environment. These emissions include greenhouse gases, wastewater and waste. The consumption of natural resources must be continuously reduced. An additional goal is to create more eco-friendly packaging based on an approach to avoid, reduce, and improve.

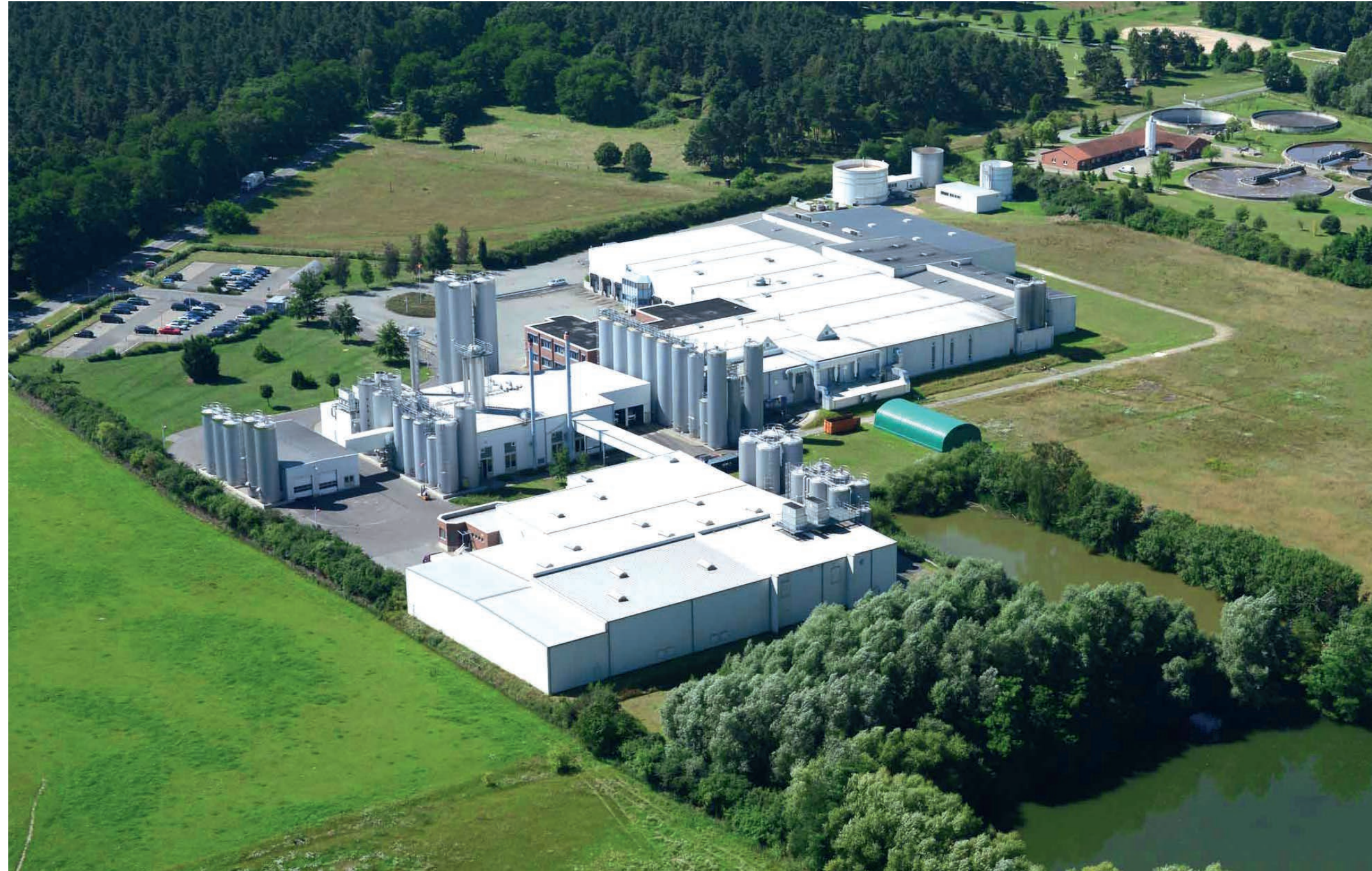
Through its certified energy management system according to ISO 50001, the Uelzena Group continues improving energy efficiency at all of its sites. All companies within the Uelzena Group pursue the goal of sustainable business. Reporting is implemented annually in an online sustainability report in accordance with the GRI standard. All employees are also requested to use energy and natural resources responsibly.

**„ We are committed to protecting the environment as best as possible and to using resources responsibly.**

### Sustainable milk production

As a milk-processing company, the Uelzena Group places extremely high value on the topic of animal welfare and on the “Five Freedoms” concept, which is reflected, for instance, in its participation in the QM dairy sustainability tool. Along with animal welfare, sustainable milk production also takes into account economic, social and environmental criteria.

**„ We advocate sustainable milk production.**





## RESPONSIBILITY TO THE SOCIETY

### Quality and product safety

The Uelzena Group and its subsidiary producers are certified according to the management system ISO 9001 and food safety systems (e.g., IFS). A major focus is on training and raising awareness of possible food safety risks and dedication of the management to being a role model. The Uelzena Group designs its training concept to continuously further develop employees' knowledge about food safety and what to do in the event of identified risks. The Group sets great store by the personal responsibility of each individual.

**» We ensure quality and product safety.**



**» We take responsibility for the community and our region and act accordingly.**



### Social and regional responsibility

The Uelzena Group considers it part of their responsibility to strengthen the regional infrastructure around their sites. It therefore procures its most important raw material, milk, predominantly from the region, from dairy farms located close to its sites. When awarding contracts to service providers, local providers are preferred if the service offered is comparable. In addition, the Uelzena Group supports promising youth projects and encourages its employees to do voluntary work.





## IMPLEMENTATION AND ORGANISATION

It is the personal responsibility of each individual to follow the Code of Conduct and in particular, our management should promote its implementation by modelling exemplary behaviour.

In the case of uncertainties relating to the content or questions on specific behaviour, every employee can contact their manager, executive management or the Compliance Officer directly at [compliance@uelzena.de](mailto:compliance@uelzena.de) (see also: <https://www.uelzena.de/en/company/compliance/>).

### Whistleblowing system

To prevent criminal procedures and to protect our reputation and assets, we have set up a communication process for employees as well as business partners and third parties to provide information (tips) on potentially illegal and damaging activities. This process ensures that tips relating to irregularities can be reported safely and confidentially, and that informers are protected against any kind of interference.

Further information on the reporting system can be found in the information for informers download (see also: <https://www.uelzena.de/en/company/compliance/>).

**i** If you have any questions, please contact the compliance officer directly: [compliance@uelzena.de](mailto:compliance@uelzena.de)

### Measures and consequences in the event of infringements

In the event of infringements of this Code of Conduct, the management of the Uelzena Group will actively take appropriate measures to clarify and correct the situation. The Uelzena Group regularly reviews this Code of Conduct. The management is responsible for possible modifications.







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