

THIS CODE OF CONDUCT IS BASED ON THE FUNDAMENTAL VALUES OF AGRANA. COMPLIANCE CONSTITUTES THE FOUNDATION FOR ALL BUSINESS ACTIVITIES AND DECISIONS AND IS PART OF THE COMPANY STRATEGY. THE CODE IS DESIGNED TO CONVEY A CLEAR UNDERSTANDING OF THE CONDUCT WE EXPECT FROM ALL OUR INTERNAL STAKEHOLDERS IN ALL AGRANA GROUP COMPANIES AND SUBSIDIARIES, SUCH AS OUR EMPLOYEES AND MANAGERS, AND FROM OUR EXTERNAL STAKEHOLDERS SUCH AS BUSINESS PARTNERS.

ACCEPTANCE OF AND COMPLIANCE WITH THIS CODE OF CONDUCT IS REQUIRED FOR ALL AGRANA BUSINESS PARTNERS WORLDWIDE AND IS TAKEN INTO CONSIDERATION DURING THE SELECTION PROCESS.

WE CONDUCT OUR BUSINESS – THE REFINEMENT OF AGRICULTURAL PRODUCTS – IN AN ECOLOGICALLY AND ETHICALLY SUSTAINABLE AND LEGAL MANNER. WE ARE COMMITTED TO ACTING IN A SOCIALLY, ECONOMICALLY AND ENVIRONMENTALLY RESPONSIBLE WAY. WE AIM TO MAKE OUR RANGE OF PRODUCTS AVAILABLE TO FUTURE GENERATIONS AND TO MAKE A MEANINGFUL CONTRIBUTION TOWARDS SOLVING THE CHALLENGES THAT THE WORLD IS FACING.

LEGAL COMPLIANCE

We expect compliance with all applicable legal requirements at national and international level and with the AGRANA-standards.

PRODUCT QUALITY AND PRODUCT SAFETY

AGRANA-products are manufactured to high standards of quality and product safety, and shall meet the applicable regulations and specifications.

FAIR COMPETITION

We are unconditionally committed to competition by fair means and in particular to compliance with competition and antitrust legislation. Internal stakeholders at AGRANA shall comply with the antitrust law compliance guidelines and the guidelines on information exchange in joint ventures.

ANTI-CORRUPTION

We do not tolerate corruption or bribery. Our business relationships shall be based solely on the foundation of objective criteria. In addition to quality, reliability and competitive prices, these include consideration of social and environmental standards as well as the principles of good corporate governance.

Gifts and invitations must observe criteria such as economic efficiency, appropriateness and external image. Gratuities offered in accordance with local custom must under no circumstances exceed an appropriate value or be seen as bribery.

Engagement in any illegal and illicit activities is prohibited, especially the acceptance of bribes, and may result in criminal prosecution. Internal stakeholders at AGRANA shall comply with the applicable local anti-corruption and tax guidelines.

CONFLICTS OF INTEREST

In the course of business, AGRANA-employees and managers may find themselves in situations in which their personal or economic interests may come into conflict with those of AGRANA. Personnel decisions or business relations to third parties likewise must be based solely on objective criteria. In the event of a conflict of interest, internal stakeholders at AGRANA must comply with the guidelines on conflicts of interest.

BUSINESS PARTNER CHECK AND MONEY LAUNDERING

Business partners shall comply with the applicable AGRANA-values and guidelines. Business partners shall also take into account the principles set out in this Code of Conduct when selecting business partners in the value chain, and shall take appropriate measures to ensure and provide evidence of such compliance. Money laundering shall not be tolerated. We carry out a risk-based review of the identity of existing and potential business partners. All employees shall comply with the requirements for sanctions, import and export controls, and the applicable rules on preventing terrorist financing.

BUSINESS SECRETS AND INDUSTRIAL PROPERTY RIGHTS OF THIRD PARTIES

Confidential information of any kind (e.g. applied technologies, intellectual property, business, financial, and accounting information, etc.) that are obtained in the course of professional activity may only be used exclusively in the interest of AGRANA and not used in pursuit of one's own personal interests nor in the interests of third parties. In addition, the industrial property rights of third parties must be respected.

DATA PROTECTION

The protection of personal data is an important matter for us. We therefore take all the necessary precautions to ensure that data are collected, processed and utilised in a manner that is transparent, appropriate, comprehensible and careful. All employees shall comply with our AGRANA-data protection guidelines.

FINANCIAL REPORTING

As part of an internal control system, the four-eyes principle applies and business processes must be adequately documented appropriately. The full and correct collection of all the relevant accounting information shall be ensured by conducting audit procedures of this kind. AGRANA is committed to open and transparent financial reporting for the capital market using the international accounting standards.

COMMUNICATION

We take the utmost care of all forms of external presentation and adhere to our corporate identity. We value clear and open communication. Internal stakeholders at AGRANA must comply with the communication guidelines.

CAPITAL MARKET

As a listed company, we take appropriate organisational measures to prevent insider trading and market abuse. Internal stakeholders at AGRANA shall comply with the capital market compliance guidelines.

COMPENSATION AND BENEFITS

Remuneration shall meet all applicable laws and standards,¹ including those relating to minimum wages, overtime, and statutory benefits and paid vacations. Ensuring equal pay for work of equal value is important to us.

WORKING HOURS

We comply with the applicable legal restrictions on working hours. The maximum permitted working hours per week are regulated by national law and in accordance with the conventions of the International Labor Organization (ILO). Overtime is restricted according to the contractual and statutory obligations. Employees are entitled to at least one day off each week, except for

¹ Recognised standards such as the Universal Declaration of Human Rights (UDHR), the Conventions of the International Labor Organisation (ILO), the OECD Guidelines for Business, the UN Global Compact, the BSCI

Code of Conduct and the UN Sustainable Development Goals (SDGs) were taken into consideration when drawing up this Code of Conduct

exceptional circumstances and for a limited period of time. We provide for the essential rest breaks, in order not to risk the safety and health of the employees. We are committed to ensuring that work and private life are compatible.

HEALTH & SAFETY IN THE WORKPLACE

We make every effort to ensure that the workplace and its environment do not endanger people's physical integrity or health. Our aim is to continuously reduce the risk of accidents and keep on improving working conditions through suitable measures, such as training. Access to drinking water, sanitary facilities and social areas is guaranteed. The workplace and its environment must provide suitable emergency exits, fire protection equipment and have adequate lighting. Adequate protection for non-smokers must also be provided.

HUMAN RIGHTS

Respecting the applicable human rights legislation and regulations is an integral part of our corporate responsibility. We expect everyone to respect the dignity and personal rights of other human beings. AGRANA has developed and published the AGRANA-Group Policy Human Rights.

**PROHIBITION OF CHILD, FORCED AND COMPULSORY LABOUR, AND
SLAVERY**

We do not accept any form of child, forced or compulsory labour or slavery. We comply with all the relevant national and international laws, rules and regulations applicable in the respective countries, as well as applicable international standards. All young employees must be protected from performing work that is in all likelihood hazardous or would be harmful to the young employee's physical or mental health, or interfere with his education and social, spiritual or moral development.

PROHIBITION OF DISCRIMINATION AND HARASSMENT

All employees are expected to behave towards colleagues and third parties in a friendly, objective, fair, and respectful manner. Any form of discrimination and harassment will not be tolerated. Discrimination means any distinction, exclusion or preference that limits equal treatment or access opportunities to employment or occupation, which may be based on colour, sex, sexual orientation, religion, political opinion, age, national, social or ethnic origin, disability, trade union membership, family obligations or similar considerations of this kind. Internal stakeholders at AGRANA must comply with the guidelines on diversity and inclusion.

FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We acknowledge and respect the right to freedom of association and the right of employees to freely and independently choose their representatives, and guarantee that these representatives shall not suffer any form of discrimination. We also recognise the right to collective bargaining and the right to strike.

ENVIRONMENT AND SUSTAINABILITY

We are aware of our responsibility to protect the environment and climate. We are committed to doing business sustainably and in an environmentally friendly way and to making a positive impact on the communities and settings in which we have a presence. We make every effort to minimise the consumption of resources, including energy usage and emissions, water consumption and wastewater, as well as solid waste and potential environmental impacts, in our business operations and supply chain. All procedures and standards must meet or exceed the legal requirements. We act in accordance with the applicable international environmental agreements. Internal stakeholders at AGRANA must observe the AGRANA-environmental policy and the AGRANA-principles for the procurement of agricultural raw materials and primary products.

Land must be used in a manner compatible with the natural environment and landscape, and within the framework of the legislation for nature conservation, ownership and land use rights.

RESPONSIBILITY FOR IMPLEMENTATION AND REPORTING

We are all responsible for compliance with the Code of Conduct and the relevant corporate policies, and we expect the same from our business partners.

AGRANA-managers must organise their areas in a such a way to guarantee compliance with the Code of Conduct, internal corporate guidelines and statutory requirements.

In line with their fiduciary duty, all AGRANA-employees must immediately report any violations of the Code of Conduct via the standard internal AGRANA-channel of communication. Furthermore, AGRANA-employees and all stakeholders can submit reports anonymously through the [AGRANA-whistleblowing system](#). Internal stakeholders at AGRANA must comply with the AGRANA-Whistleblower guideline during this process. Retaliation against a whistleblower is prohibited, and the confidentiality of such reports is guaranteed. All reports are reviewed, processed, documented and closed after action has been taken.

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