

Code of Conduct for Suppliers and Business Partners of the Westfleisch Group, Münster

Introduction¹

The Westfleisch Group is committed to respecting human rights and environmental standards in its own business and in its supply chains. This “Code of Conduct for Suppliers and Business Partners”, (also referred to in the following as the “Code of Conduct”), defines principles and requirements regarding compliance with human rights and environmental standards in the supply chains. It applies bindingly to suppliers and business partners of the companies of the Westfleisch Group (referred to in the following as “Westfleisch”).

Westfleisch assumes a special responsibility for society and the environment through its actions. This Code of Conduct contains binding requirements at Westfleisch to ensure that applicable standards concerning human rights and the environment are not only observed in Westfleisch's own business operations, but also in its supply chains. Mutual trust is essential to our business relationships with our suppliers and business partners and is fundamental to our ability to meet our corporate and supply chain responsibilities.

This Code of Conduct is based, among other things, on the principles of the UN Global Compact, the United Nations Universal Declaration of Human Rights, the core labour standards of the International Labour Organization (ILO) as well as the Stockholm and Basel Conventions and is aligned with the amfori BSCI Code of Conduct.

With this Code of Conduct, we want to ensure that our principles and our claim to taking responsibility are adhered to and enforced both in Westfleisch's business operations and in the supply chains. With this Code of Conduct, we aim to ensure that our principles and our commitment to taking responsibility are respected and enforced both within the company and in the supply chains. Important aspects of these standards are part of our supplier selection process before we enter into a business relationship.

Suppliers and business partners who maintain or wish to enter into a business relationship with Westfleisch are obliged to comply with the principles set out in this Code of Conduct and to fulfil their responsibility to respect human rights and the environment within their sphere of influence. They shall demonstrate or develop, as appropriate, the necessary management systems, policies and processes and, where negative impacts on human rights and the environment are identified in the supply chain, effectively address them and prevent their recurrence. Suppliers and Westfleisch shall engage in a constructive and open dialogue in order to implement these principles.

Westfleisch is strongly committed to the early detection, monitoring and elimination of breaches of relevant provisions in its supply chains. The company does not tolerate any violations of the provisions in this Code of Conduct. Violations may therefore ultimately lead to the termination of a business relationship if actions by suppliers contravene these provisions or if the supplier or business partner is not prepared to take necessary measures to comply with the obligations set out in or associated with this Code of Conduct.

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¹ For reasons of better readability, the simultaneous use of the language forms diverse, female, male (d/f/m) is dispensed with in personal designations. All personal designations apply equally to all genders.

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1. Compliance with Law and Justice

Compliance with legislation is the first duty of companies. Westfleisch complies with laws and regulations as a basic principle of its economically responsible actions and respects the applicable legal prohibitions and obligations at all times. We therefore require that our business partners and suppliers also comply with all applicable laws and regulations.

2. Observance of Human Rights

For Westfleisch, respect for human rights is of paramount importance and it does not tolerate violations of human rights. Westfleisch requires its suppliers and business partners to comply with internationally recognised human rights as well as to respect personal rights.

We are particularly guided by compliance with the ten principles of the United Nations Global Compact, the United Nations Universal Declaration of Human Rights and the fundamental labour rights of the International Labour Organization (ILO).

3. Prohibition of Forced Labour, Child Labour and Slavery

Westfleisch strongly condemns forced child labour and slavery. Suppliers and business partners shall not have recourse to any form of servitude, forced or compulsory labour, peonage, slavery, human trafficking or other involuntary labour. Our suppliers and business partners shall grant their employees the right to leave their workplace and terminate their employment relationship with reasonable notice. They shall ensure that employees are not subjected to degrading treatment or physical or psychological punishment. In order to protect children, we demand strict compliance with the valid minimum age of employment set out in conventions of the International Labour Organisation (ILO) when recruiting new employees.

In particular, we expect the following from business partners and suppliers:

- Implementation of and adherence to appropriate social standards in order to identify and prevent all forms of forced labour and associated practices.
- Establishment of age assessment mechanisms in the recruitment process. This includes, in particular, checking the date of birth and documenting it in the personnel file.
- No recruitment of children under 15 years of age or children who have not yet reached the legal minimum age for the completion of compulsory education.

4. Prohibition of Certain Acts by Security Staff

Westfleisch does not tolerate the use of security staff that disregard the prohibition of torture, harm life or limb, or interfere with freedom of assembly and freedom of association. We expect our suppliers to eliminate the use of such security staff and to ensure that such security staff are not used.

In particular, we expect the following from business partners and suppliers:

- Implementation of appropriate guidelines for the verification of security forces used.
- Obtaining declarations of commitment to respecting human rights and commitment to the prohibition of torture and the infringement of life or limb or freedoms of association and assembly.

5. Equal Treatment and Non-discrimination

At Westfleisch, we are committed to equal opportunities and prevent any kind of discrimination. We expect our suppliers and business partners to practise equal opportunities and to treat all employees equally, regardless of gender, age, skin colour, culture, ethnic origin, sexual identity, disability, religious affiliation or ideology. These elementary principles apply both during the recruitment process and during employment.

In particular, we expect the following from business partners and suppliers:

- Implementation of appropriate regulations for compliance with applicable workers' rights
- Adherence to the principles of equal opportunity during recruitment and other personnel-related activities.
- Compliance with the equal treatment of employees and the implementation of internal guidelines put in place for this purpose.

6. Working Hours and Statutory Pay

Westfleisch strictly observes regulations on working hours, company and legal provisions and fulfils the requirement for appropriate remuneration of employee. We expect our suppliers and business partners to strictly observe applicable regulations on working hours and the payment of appropriate remuneration as well as the observance of applicable company and legal regulations. Remuneration and other benefits must at least comply with the respective national and local regulations in order to enable the employees and their families to live in dignity.

In particular, we expect the following from business partners and suppliers:

- Compliance with applicable working time regulations.
- Punctual, regular and full payment of appropriate pay and compliance with the relevant remuneration provisions.

7. Freedom of Association

Westfleisch respects the right of all employees to form trade unions and employee representatives. We expect our suppliers and business partners to respect and enable the rights of all employees to form and join trade unions and employee representative bodies in accordance with legal provisions.

In particular, we expect the following from business partners and suppliers:

- Recognition of the right to establish trade unions and to join the same and organise themselves within the same.
- No discrimination of employees based on their membership of a trade union.
- Respect for the rights of workers to collective bargaining.

8. Occupational Health and Safety

The safety and health of employees is of paramount importance to Westfleisch. To this end, we have implemented a management system for occupational safety and health (DIN ISO 45001:2018), among other things. We expect our suppliers and business partners to demonstrate management commitment to occupational health and safety, strict adherence to occupational health and safety, and implementation of regulations and required measures. The importance of and responsibility for occupational health and safety depend on the activities of the employees. We assume that employees are trained - depending on the activity performed - and that a risk assessment and control measures have been carried out, and that measures for compliance with legal requirements and emergency plans as well as a management system for safety and health at work are in place.

In particular, we expect the following from business partners and suppliers:

- Implementation of an appropriate management system for occupational health and safety in the areas of risk assessment, risk minimisation, the description of procedures, implementation, supervision and evaluation.
- Comply with relevant safety regulations and take appropriate measures to prevent violations and accidents.
- Designation of persons responsible for occupational safety and implementation of training courses.
- Providing information and support for their own suppliers when realising these standards (e.g., ISO 45001).

9. Sustainable Environmental Protection and Protection of Livelihoods

Sustainable environmental protection is an important corporate goal for Westfleisch. As an expression of these corporate goals, our operations are certified according to DIN EN ISO 50001 (energy management) and DIN ISO 14001 / EMAS (environmental management), among others. We expect our suppliers and business partners to keep impacts on the environment as low as possible and to comply with environment-related prohibitions. In addition to animal protection, these include the agreement on reducing the use of mercury (Minemata Convention), preventing violations of the environmental agreement on preventing marine pollution and against the misuse of certain living organic substances (Stockholm Convention). We also expect that improper handling, storage, disposal, export, import of waste under the PoPs Convention and the Basel Convention will be prevented and that the natural resources of water, air and soil will be responsibly handled.

In particular, we expect the following from business partners and suppliers:

- Review of the operational business for significant environmental impacts.
- Establish effective policies and procedures that reflect environmental responsibility.
- Implement appropriate measures to reduce adverse impacts on the community, natural resources and the environment as a whole.

10. Fair Competition and Prohibition of Corruption

Westfleisch is committed to fair competition and strictly rejects unfair competitive practices and corruption both within the company and among market participants.

In particular, we expect the following from business partners and suppliers:

- Strict compliance with principles of fair competition as well as applicable antitrust laws. This includes, in particular, not entering into contracts that illegally restrict trade or restrict competition.
- Not exerting undue influence on our employees or third parties.

In the event of suspicions regarding corruption or violations of fair competition, including in our business area, we expressly refer to our information system in accordance with section 13.

11. Other Prohibitions

Furthermore, Westfleisch will not tolerate any conduct or omission which is directly capable of impairing one of the aforementioned protected legal positions in a particularly serious manner and the illegality of which is obvious upon reasonable assessment of all circumstances under consideration.

12. Complaints Procedure and Contact Persons

All employees of a company and third parties must have the possibility to report their concerns in case of possible misconduct or if they are affected by negative impacts. If necessary, it must be possible to report misconduct anonymously. Westfleisch has set up a complaints procedure for this purpose and appointed contact persons.

We expect our suppliers and business partners to implement a complaints management system, which must be appropriately designed in accordance with the size of the company. In addition, there must be a process to ensure that a complaint redress and resolution procedure is in place.

13. Action and Implementation of Principles in the Code of Conduct

We require our suppliers and business partners to work towards compliance with the aforementioned requirements and objectives and expect appropriate measures and control mechanisms to be implemented in order to meet these requirements and objectives. Suppliers and business partners must ensure that these requirements and objectives are implemented and adhered to both in their own organisation and in the upstream supply chains, and that appropriate control mechanisms are implemented in the supply chains. Westfleisch is entitled to carry out appropriate checks to verify compliance with the human rights strategy.

Suppliers and business partners are obliged to report any violation of the Westfleisch Code of Conduct. The notification shall be made while safeguarding the legitimate interests of the supplier or business partner. The notification shall be addressed to the Compliance Officer, (compliance@westfleisch.de) or the ombudsman (ombudsmann@thielvonherff.com) at Westfleisch. Appropriate remedial action shall be taken immediately in the event of a breach of the Code of Conduct. Appropriate evidence shall be provided to Westfleisch upon request.

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