

## Code of Conduct of the Tönnies Group of Companies for the area of Germany “TÖNNIES Code of Conduct (Compliance Rules)”

TÖNNIES is committed to certain corporate compliance rules.

This also results in guidelines for ethical behaviour. The Code of Conduct sets out in more detail those areas in which TÖNNIES expects ethically responsible behaviour from its employees. This Code of Conduct applies to all employees of the TÖNNIES Group.

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### **1. The employment relationship is freely chosen**

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- 1.1 There is no forced labour, compulsory labour or involuntary prison labour.
- 1.2 Workers shall not be required to deposit "securities" or identification papers with their employers and are allowed to leave employers on reasonable notice.

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### **2. The freedom of association and the right to collective bargaining are respected**

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- 2.1 Employees shall have the right, without distinction, to join trade unions of their choice or to establish works councils in accordance with the law.
- 2.2 The employer shall be open to the activities of the employee representatives and seeks dialogue.
- 2.3 Employee representatives shall not be discriminated against and can perform their representative functions in the companies without hindrance.

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### **3. Safe and hygienic working conditions**

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- 3.1 A safe and hygienic working environment must be ensured, taking into account relevant knowledge of the industry and specific hazards. Appropriate measures shall be implemented to prevent accidents and damage to health in connection with or during the performance of work by minimising the sources of danger present in the working environment, where practicable.
- 3.2 Workers shall receive regular documented health and safety training. This training shall be repeated for newly recruited or reassigned workers.
- 3.3 Access to clean toilets, drinking water and, if applicable, sanitation facilities for food storage must be ensured.
- 3.4 Any accommodation provided must be clean, safe and meet the basic needs of the workers.

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### **4. No use of child labour**

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- 4.1 There shall be no recruitment/employment of children.
- 4.2 Children and young people under the age of 18 shall not be employed at night or under dangerous conditions (in accordance with the Youth Employment Protection Act).

## 5. Payment of living wages

- 5.1 Wages and fringe benefits paid for a standard working week shall at least comply with national legal standards (minimum wage). In any case, the wage should be sufficient to cover basic needs and should also include a certain amount of disposable income. Geographical differences must be taken into account.
- 5.2 All workers shall be informed in writing and in an intelligible form of their conditions of employment with regard to remuneration before commencing employment, and shall receive a wage statement for the relevant pay period each time their wages are paid.

## 6. No increased working time

- 6.1 Working hours are in accordance with the regulations of national law.
- 6.2 The worker is regularly not required to work more than 48 hours per week and has on average at least one day off after 6 days.

## 7. No discrimination

- 7.1 The company is committed to equal opportunities, equality and a respectful working environment. Employees shall not be discriminated against, in particular on the basis of ethical or national origin, religion, gender, age, disability, illness (e.g. HIV), marital status, sexual orientation, trade union membership or affiliation to a political group. Any sexual harassment is not accepted. TÖNNIES is committed to making every effort to oppose racism of any kind.

## 8. Regulated employment relationship

- 8.1 The employees' work shall be performed on the basis of the labour law provisions applicable in Germany and shall be regulated accordingly by contract.
- 8.2 TÖNNIES shall fulfil its legal and contractual obligations as an employer towards its employees. These obligations shall not be circumvented by pseudo-self-employment or unlawful constructions.

## 9. Harsh or inhuman treatment is not permitted

- 9.1 Physical abuse or punishment, threats of physical abuse, sexual or other harassment, insulting or other forms of intimidation are not permitted.

## 10. Healthy working atmosphere

- 10.1 The values, strategies, goals and visions defined in the Tönnies Group shall serve to promote a performance-oriented working atmosphere. Duty of care and allegiance shall be promoted by both management and works council. Interaction at all levels is characterized by reliability, fairness, respect and openness. A good working atmosphere is, among other things, a prerequisite for motivated employees, performance and ultimately also a key factor for the company's success that should not be underestimated.

**Conclusion:**

Respectful interaction, coupled with openness, reliability and fairness, is conducive to cooperation within the company.

## **11. Environment**

- 11.1 The TÖNNIES Group complies with all legal requirements relating to sustainability and environmental protection.
- 11.2 Among other things, energy-efficient aspects are taken into account in case of new acquisitions. Equipment and machinery shall meet at least the legal requirements. Suppliers and stakeholders are encouraged to comply with their legal requirements. The company strictly orients its behaviour towards an improvement of the carbon footprint.

## **12. Legislation**

- 12.1 TÖNNIES undertakes to comply with all laws applicable to the TÖNNIES Group of Companies. Furthermore, it is expected that all employees behave in such a way, too.

## **13. Confidential information**

- 13.1 Employees must treat all company information as confidential and may not disclose it to third parties without the express consent of their immediate supervisor. Employees are required not to disclose confidential company information even after their employment has ended.

## **14. Conflicts of interest**

- 14.1 All employees are expected to represent the interests of the company in their work to the best of their knowledge and belief. Employees must avoid all actual or apparent conflicts of interest between themselves and the company. Specifically, conflicts of interest are not permitted in transactions or business dealings between the company and the company's suppliers and/or customers that result in financial or tax benefits to the employee or a member of the employee's family, unless specifically approved by management. Any conflict of interest must be reported to the immediate supervisor. If there is any doubt, the employee must discuss the matter with his or her supervisor.

## **15. Receiving and handing over gifts and entertainment**

- 15.1 As a general rule, employees may not accept or give gifts in excess of the non-taxable benefits from or to suppliers, customers or third parties with whom the company has a business relationship. The company is aware that in some cultures business gifts and entertainment play an important role. Should the business relationship be jeopardised in the event of a refusal to accept, the employee must discuss the matter with his or her direct supervisor.
- 15.2 TÖNNIES excludes business activities based on extortion, corruption, malice or bad faith. Whistle-blower protection for such messages shall be granted.

## 16. Company property

16.1 Each employee shall protect the property of the company, including money and funds, as if it were his or her own property.

## 17. Alcohol and drugs

17.1 The consumption of alcohol and/or drugs is not permitted. Likewise, employees who are under the influence of alcohol and/or drugs will not be tolerated and must leave the workplace.

## 18. Infringements

18.1 Infringements of the Code of Conduct may result in disciplinary action or consequences under employment law. The company reserves the right to take action against such infringements.

## 19. Compliance regulations / Duty of care

19.1 This Code of Conduct addresses the main areas in which the company expects its employees to act ethically. This Code cannot cover every legal or ethical issue that may be involved. Nor can it cover every detail of every issue. If employees have questions about the Code or need advice in specific situations, they can always ask their supervisor for advice. The supervisor must treat this with due seriousness.

Otherwise, one's own actions can always be seen as a role model for others in the company.

Rheda-Wiedenbrück,



Clemens Tönnies

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