

# Code of Conduct

for suppliers/subcontractors

## PREFACE

Interquell Cereals GmbH (IQ Cereals) is a modern, efficient company with a diverse product range that has been operating as a family-run, medium-sized business at its site in Großaitingen since 1969. Producing organic baby and toddler food of the highest quality is at the heart of IQ Cereals' business activities. The particularly high quality of the products is achieved by combining the most careful processing with a high degree of control during the supply and production phases. Great importance is also attached to the origin of the raw materials. In addition to compliance with the high regulatory requirements for achieving first-class quality standards and the implementation of customer requirements along the entire supply chain, production in accordance with the best possible social and ethical principles is an important basis for the actions of IQ Cereals.

With our Code of Conduct we have drawn up a set of principles which defines our corporate activities and the requirements that IQ Cereals places on its suppliers/subcontractors. It is intended as the basis for the business relationships between everyone involved along the entire value chain.

# Our self-image at Interquell

## Declaration of principle

Our principles include transparent conduct and sustainably responsible economic activity. Our Code of Conduct is based on the principles of the International Labour Organization (ILO), the UN Global Compact, the OECD Guidelines and the United Nations Declaration of Human Rights, the UN conventions on the rights of children and aspects of the German Supply Chain Act (LkSG). We respect the interests of environmental and species protection in our business activities.

We actively work to safeguard human rights. We respect human dignity and the rights of the individual, their privacy and the personality rights of everyone. We guarantee equality of opportunity and equal treatment of all workers, regardless of their nationality, ethnicity, skin colour, family obligations, political or religious conviction, any disability or sex or age. Discrimination or personal harassment of workers is not accepted. Fair remuneration (at least the statutory minimum wage), freedom of association, right of free assembly and right to collective bargaining, membership of workers' organisations or trade unions are guaranteed. Forced labour, any form of non-voluntary work and child labour are prohibited.

We adhere to the applicable laws and standards concerning health and safety at work and ensure a safe and hygienic working environment. We also regularly analyse and check relevant work processes for potential health and safety risks and take appropriate measures to minimise such risks.

We do not accept the taking or offering of bribes or similar payments. We foster reliable, fair and conscientious dealings with our business associates. Our business associates are selected under fair conditions. We handle confidential information conscientiously and observe the statutory data protection requirements.

We have an obligation to the environment. We prioritise sustainable and environmentally conscious ways of doing business. We pay attention to environmental protection as defined in the applicable statutory. Our goals are to minimize adverse impacts on both the community and natural resources, while constantly improving environmental protection. We are systematically moving along our path to sustainability and are gradually becoming more climate friendly. We constantly strive to use renewable energy sources.

Risk management and prevention are fundamental issues for us. An effective quality assurance system is essential. The activities we carry out are checked and evaluated. The knowledge derived from this monitoring is incorporated into our further development. One important aspect for transparency and prevention in supply chains is the setting up of effective complaint mechanisms. It is especially easy to report compliance breaches digitally using the Interquell WhistleBox – anonymously if

preferred. The digital reporting platform also allows seamless communication that complies with data protection requirements between whistleblowers and the competent compliance departments of IQ Cereals. Anyone who wishes to report compliance breaches without using a digital tool can also approach the IQ Cereals data protection officer. Complaints from customers concerning product quality, for example, are not regarded as compliance breach reports, however. For these, please contact the quality assurance department. In the interests of our joint development, we encourage external persons and employees to report any suspicions they might have of breaches of the law or misconduct. Whistleblowers must not suffer any disadvantages because of reporting compliance breaches in the work context.

In line with our values and our vision we wish each of our employees, suppliers and partners to actively work with us to achieve our goals.

Yours sincerely, GEORG MÜLLER

## Requirements of us and our suppliers

With our fundamental requirements as set out above in the areas of human rights and working conditions, prevention of corruption, environment and commercial integrity, the Code of Conduct concerns our self-image and contributes to long-term business relationships with our suppliers/subcontractors. It forms the interface between our internal corporate goals and what we expect of the conduct of our partners all along the value chain. At the same time, the Code of Conduct acts as a common basis of understanding which can be used to take measures, either individually or together. Besides that, our suppliers/subcontractors shall communicate our principles and our fundamental requirements in the areas of human rights and environmental protection in a suitable manner to their own suppliers/subcontractors.

IQ Cereals furthermore reserves the right to request additional evidence if there is suspicion to the contrary.

This Code of Conduct applies to our suppliers/upstream suppliers in all sourcing areas.

## 01 SOCIAL RESPONSIBILITY AND COMPETENCE

Our suppliers/subcontractors undertake to adhere to the applicable legislation and internationally recognised human rights in their production facilities. We expect of our partners that the production and working conditions in these facilities are in line with the ILO conventions, the UN Global Compact, the OECD directives and the United Nations general declaration of human rights and the UN conventions on the rights of children. If different regulations apply in parallel, the regulation to be applied is the one which offers employees the highest level of protection and safety.

### 1.1. BAN ON CHILD AND FORCED LABOUR AND PROTECTION FOR JUVENILE EMPLOYEES

The use of child labour as defined by the ILO and UN conventions and/or applicable national law is not accepted by IQ Cereals. We expect adherence to all regulations concerning the protection of children and juvenile employees. The supplier is to inform IQ Cereals of any suspicion, implement and document suitable corrective actions and demonstrate these to IQ Cereals. In the event of a breach, the supplier/subcontractor is to immediately carry out, document and demonstrate to IQ Cereals suitable remedial measures. All forms of forced, slave and prison labour are prohibited. No employee may, either directly or indirectly, be forced into employment by force or coercion.

### 1.2. BAN ON DISCRIMINATION

The supplier/subcontractor refrains from discrimination. This includes discrimination on the grounds of race, religion, age, nationality, social or ethnic origin, sexual orientation, sex, disability, political opinion, membership of a workers' organisation or trade union or other personal features (e.g. skin colour). The supplier/subcontractor also ensures equality of opportunity for their employees.

### 1.3. FAIR WORKING CONDITIONS

The applicable regulations and industry standards on remuneration and benefits are to be observed by suppliers/ subcontractors and their employees are to receive fair and reasonable wages. The supplier/subcontractor pays at least the statutory (or normal in their industry) minimum wage, whichever is the higher. Wages must not fall below the local minimum wages. We expect the supplier/subcontractor to adhere to the legally prescribed maximum working hours. We also expect that he will allow employees establish their own or be represented by the workers' representatives and trade unions of their choice. Furthermore, we expect the supplier/subcontractor to give priority to work safety and health protection for employees and in particular to guarantee employees safe working conditions that are compatible with health. All employees are to be treated with dignity and respect. Any type of physical punishment, threat of violence or harassment, intimidation or abuse, especially in physical, sexual, psychological or verbal form, is prohibited. Disciplinary measures must only take place

in line with national laws and internationally recognised human rights. We expect our suppliers/subcontractors to set up effective mechanisms within their operations that allow employees to raise complaints concerning negative impacts arising from work situations and to work on these along the entire supply and production chain that they use if this has not already been implemented in full by their upstream suppliers. Employees who raise a complaint based on applicable principles of this Code of Conduct and/or applicable national/international law must not be subject to any disciplinary or retaliatory measures by the supplier/subcontractor.

## 02 ENVIRONMENTAL OBLIGATION AND AWARENESS

The protection of nature and the environment is a fundamental principle of our corporate philosophy. Suppliers/subcontractors are required to comply with the environmental standards applicable to them and, in accordance with the principles for sustainable development in the 1992 Rio Declaration, also to work towards a continuous reduction and avoidance of environmental pollution and the continuous improvement of environmental protection measures. Waste management, the handling and disposal of chemicals and other hazardous substances, emissions and wastewater treatment must at least conform to the applicable statutory regulations and standards. Environmentally and socially compatible production should be promoted. Responsible and efficient use of resources is to be guaranteed in all phases of the value chain. The consumption of resources should be continuously further optimised (see [www.un.org/depts/german/conf/agenda21/rio.pdf](http://www.un.org/depts/german/conf/agenda21/rio.pdf)).

### 2.1 CONSIDERATION FOR LIMITED RESOURCES

As resources, IQ Cereals uses soil, water, air and their raw ingredients and materials produced from them. Their resource efficient use and continuous improvement of processes is an obligation for IQ Cereals. We expect our supplier/subcontractor to make similar endeavors to show consideration for our limited resources. Only raw ingredients that meet the statutory requirements may be used for any products manufactured for IQ Cereals. At the time they are used, they must meet the latest scientific standards and the recommendations of national and European scientific institutions and must have been assessed as safe by them. All packaging commissioned by IQ Cereals must provide appropriate product protection and must protect against damage, spoilage, contamination and migration. It must meet the requirements concerning transportation, storage, handling as far as or at the place of sale or on the customer's premises. The packaging must also meet the statutory minimum requirements concerning the avoidance of unwanted substances (MOSH migration, etc.). The goal is to avoid or save on packaging where possible or to replace primary material with recycled material. The priority is to make responsible use of resources. All packaging must be recyclable in accordance with the currently applicable and recognised German and European

standards and directives. Promotion of the circular economy is an important point. The same applies to saving on packaging materials and changing over to sustainable and resource efficient packaging. The supplier/subcontractor will work continuously to improve this in coordination with IQ Cereals.

## 2.2. CLIMATE/ENVIRONMENTAL PROTECTION AND BIODIVERSITY

We expect our suppliers/subcontractors to assume responsibility with respect to climate protection issues and make an active contribution to limiting global warming. Statutory requirements resulting from adoption of the EU's Green Deal are to be independently pursued, observed and implemented by all suppliers/subcontractors. The supplier/subcontractor assumes responsibility with respect to environmental protection issues and adheres to all the applicable regulations. Without biodiversity, our basis for life and food are at risk. We need to leave behind an environment full of variety for those who follow us. For this reason, we are working intensively with our suppliers/subcontractors to develop new product lines that have as little impact on the environment as possible. Our goal is to make as many of our products and processes as possible more environmentally friendly. The supplier/subcontractor is to guarantee transparency in the supply chain and traceability of the raw ingredients. The countries of origin of the raw ingredients must be known and verifiable by the supplier/subcontractor and IQ Cereals.

### 03 CHECKS/INFORMATION

The supplier shall address IQ Cereals human rights-related and environment-related expectations appropriately along the supply chain. If there are any suspicions, he shall check compliance with the specifications in a suitable form and inform IQ Cereals immediately. He shall also work towards preventing further infringements and improving the processes.

We are entitled to monitor adherence to this Code of Conduct. The supplier/subcontractor undertakes to respond conscientiously and promptly to enquiries from us concerning adherence to the code. If we have any suspicions, we are also entitled, after giving reasonable notice – or without notice in very urgent cases – to carry out audits on the supplier's premises during normal working hours to check adherence to the principles. We only work with suppliers who maintain open and transparent evaluation processes and who give priority to working to adhere to our Code of Conduct if they do not already do so fully.

### 04 IMPLEMENTATION OF THE REQUIREMENTS

We expect that our supplier/subcontractor will appropriately implement the standards defined in this Code of Conduct within his own company management and the relevant processes. The supplier/subcontractor is required to appoint a contact who can provide information concerning adherence to the Code of Conduct. Regardless of this, the supplier/ subcontractor declares that he is prepared to illustrate to IQ Cereals upon request, either in writing or in text form, the measures taken to fulfil / implement this Code of Conduct. The supplier/subcontractor handles personal data with care during collection, use and other processing (including the data of employees, suppliers, customers and consumers) and observes the applicable statutory requirements concerning data protection and information security.

### 05 REQUIREMENTS OF THE GERMAN SUPPLY CHAIN ACT

IQ Cereals only concludes contracts with suppliers/subcontractors who already adhere to minimum social and environmental standards as defined in the German Supply Chain Act (abbreviated to LkSG) or are at least actively and specifically working on implementing the standards soon. We expect the supplier/subcontractor to set up an appropriate risk management system as defined in the Supply Chain Act, to carry out regular risk analyses for this purpose, to implement preventive measures within their own area of business concerning their own direct suppliers/subcontractors, to take any corrective actions without undue delay and to set up a suitable complaint procedure. The supplier/subcontractor shall also in a suitable form exercise the duties of care defined in the Supply Chain Act regarding their own direct suppliers/subcontractors,



shall properly document the measures and shall demonstrate them to IQ Cereals in a suitable format upon request. If we or our suppliers/subcontractors have actual indications that a breach of a human rights-related or environment related obligation by their direct suppliers appears possible, an appropriate risk analysis is to be carried out without undue delay, appropriate preventive measures are to be established with respect to the cause and a concept is to be drawn up and implemented to prevent, terminate or minimise the breach.

## 06 LEGAL CONSEQUENCES OF BREACHES OF OBLIGATIONS ARISING FROM THE CODE OF CONDUCT

If, despite receiving a warning from IQ Cereals that sets a reasonable period for remediation, the supplier/subcontractor continues to culpably breach an obligation arising from this Code of Conduct, IQ Cereals is entitled to withdraw from all contracts with the supplier/subcontractor not yet completely fulfilled with respect to the as yet unfulfilled part of the contract and, if a continuing obligation exists, to exercise extraordinary termination of the contract without notice with good cause. This provision does not affect other statutory guarantee, or compensation claims that IQ Cereals may make.

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The parties hereby agree, in addition to the contractual provisions that exist between them, to this Code of Conduct and the guidelines it contains concerning the social and environmental standards that are to be followed.

Version dated, 01. January 2025

### **Supplier's acknowledgement and consent**

By signing this document, the supplier undertakes to act with responsibility and to adhere to the principles/requirements set out in it.

The supplier/subcontractor shall communicate the content of this Code of Conduct in a suitable form to his employees, agents and suppliers and shall advocate for implementation of the requirements within the supply chain. He undertakes to inform IQ Cereals unprompted if there are any suspicions. In so doing, he shall cooperate in the clarification of the suspicion and implement corrective actions.

### **Contact person of the supplier/subcontractor for information on compliance with the Code of Conduct**

Company, address:

First name, last name:

Telephone, e-mail:

Place, Date

Stamp

Signature – Supplier/ Subcontractor

Place, Date

Stamp

Signature – Interquell Cereals GmbH