

# Code of Conduct Verhaltenscodex - EN

Revision: 00

**Gültig ab:** 01.09.2022

**ZMH Nr.:** V-1.1-4

Dokumentenklasse VA Gruppendokument

### 1. Introduction

Our Code of Conduct is a commitment to ethical business practices. Our business practices are based on integrity, honesty and fair behavior.

This Code of Conduct serves as our guideline and describes the principles that form the base for our decisions and actions. We, the MTK Group, base our business actions and decisions on these values.

The Code of Conduct is intended to help our employees and managers to understand our principles and to act in accordance with them. Accordingly, it applies to every single employee of the MTK Group.

The Code of Conduct is intended to clearly signal our requirements, values and principles to our business partners and customers.

## 2. COMMITMENT OF THE MANAGEMENT

The Code of Conduct represents binding principles that must be followed by every employee of the company. In particular, the members of the Management and all executives are responsible for the active implementation of this Code of Conduct. They must act as good role models in all respects.

We comply with the laws and other legal regulations of the countries in which we operate.

#### 3. COMMITMENTS OF SUPPLIERS AND SERVICE PROVIDERS

We expect our suppliers and service providers to comply with the guiding values of the Code of Conduct, support them in this and encourage them to do the same in their companies and supply chains. Our service providers or suppliers must comply with the laws and other legal regulations of the countries in which they operate.

We, the MTK Group, respect the rules of fair and open competition and do not enter into any agreements that influence competition in an inadmissible manner. This applies equally to our suppliers and service providers.

# 4. COMPANY AND BUSINESS SECRETS

Our employees are committed to maintain secrecy about company and business secrets and other internal matters. This also applies accordingly to the non-publicly accessible information about any contractual partners and customers. The obligation to maintain confidentiality shall continue to apply after termination of the employment relationship.

# 5. DATA PRIVACY

In addition to the general confidentiality provisions, data secrecy must be observed in accordance with the Regulation on the Protection of Personal Data (DS-GVO). In particular, it is prohibited to process, disclose, make accessible or otherwise use protected personal data without authorization for any purpose other than that which is part of the respective lawful performance of duties. This obligation to maintain data secrecy shall continue to apply even after leaving the MTK Group.

## 6. PRODUCT SAFETY & QUALITY

We produce high-quality food with all our production and business units and thus contribute significantly to customer satisfaction while maintaining consistent product quality, optimal product safety, and specific customer requirements. We are committed to manufacturing our products in compliance with all legal, regulatory and customer requirements relating to food safety.

# 7. Bribery, Money Laundering and Corruption

We, the MTK Group, strongly oppose any form of corruption. We do not tolerate any form of bribery and encourage our business partners to take a clear stand against corruption and bribery.

We refuse to do business with money that has been criminally acquired.

Every employee of the company or business partner is obliged to report any suspicions or legal doubts regarding the existence of corruption, bribery or money laundering.

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8. HANDLING CONFLICTS OF INTEREST, GIFTS AND INVITATIONS

We are aware that decisions in connection with professional activities must not be influenced by private interests or personal relationships. Situations in which conflicts of interest may arise should therefore be avoided.

The proper way to deal with potential conflicts is to fully disclose all facts. Even in connection with gifts and invitations, only absolute transparency can protect against harm. In order not to create the impression that a business partner or customer can obtain advantages through gifts or invitations, no gifts or inappropriate invitations from a business partner are accepted as a matter of principle. The only exceptions are low-value gifts such as promotional or giveaway items. Gifts and invitations addressed to the private address may neither be granted nor accepted.

### 9. FEEDBACK MECHANISM / COMPLAINT MANAGEMENT

We want to maintain and strengthen the trust of our business partners, service providers, employees and the public in us. Therefore, feedback in any form is very important to us, as every feedback contributes to continuous improvement. We would like to encourage all business partners and employees to report any misconduct on our part and to inform us about activities that are not in line with our values and ethical principles of this Code of Conduct.

First and primarily, we recommend that all business partners and employees contact their contact person, supervisor or trusted person in the company directly, who will address your concern. You can use the contact form on our homepage to contact us anonymously with any complaints/objections, etc. We encourage our employees to use this channel for their concerns as well.

As a matter of principle, we will not trace complaints. However, if information is of criminal relevance or violates an applicable law, we reserve the right to investigate.

All reports will be treated securely and confidentially.

# 10. PRINCIPLES OF SOCIAL RESPONSIBILITY

Social responsibility is an essential component of value-based management. We respect and support the protection of human and labor rights. In this context, we are committed to compliance with the UN Guiding Principles on Human & Labor Rights, as well as the requirements of the OECD Guidelines.

The prohibition of child labor and forced labor in any form is observed.

Discrimination in any form is not tolerated. We strongly oppose unacceptable treatment of employees as well as violence, harassment, threats, humiliation or harassment in the workplace.

We promote equal opportunities and equality for our employees and actively work to ensure that none of our employees is discriminated against on the basis of gender, ethical or national origin, religion, age, disability or individual identity.

We have implemented a gender management system to promote equal treatment within the group. We, MTK Group encourage any employee who feels that he/she is not treated equally to contact the Confidential Counsellors or anonymously express his/her concern via the contact form.

Employees' freedom of assembly and association is recognized to the extent legally permissible under national regulations. We observe the applicable national laws and labor standards with regard to appropriate remuneration and maximum working hours. This naturally includes compliance with all provisions of the law regulating a general minimum wage. We ensure fair working conditions overall.

Occupational safety and health protection in the workplace is ensured within the framework of national regulations. We comply with all laws and regulations relating to health and safety at work to protect our employees. To this end, measures are taken in particular by our managers to create a healthy and hazard-free working environment for our employees.

As far as consumer interests are concerned, the company complies with consumer protection regulations.

It goes without saying that we expect all business partners and customers to comply equally with our ethical and social principles.

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#### 11. PRINCIPLES OF ECOLOGICAL RESPONSIBILITY

The protection of the environment is an important topic for us. All our employees are required to treat all natural resources used in our company (e.g. energy, water, land, etc.) with care. Our responsible use of resources is also demonstrated by the implementation of an energy management system.

A responsible use of our resources in the production and distribution of our products to protect the environment is expected by our employees and business partners, as well as customers.

# 12. CONSEQUENCES OF NON-COMPLIANCE WITH THE PRINCIPLES

This Code of Conduct combines applicable statutory and company regulations. The obligation to comply with the principles set out in the Code of Conduct arises either directly from the law, company regulations, corporate guidelines and directives or from the employment contract.

We, the MTK Group and all our employees conduct ourselves in accordance with this Code of Conduct. We are aware that failure to comply with this Code of Conduct, especially through deliberate violations, may result in serious consequences. This applies equally to our business partners and service providers.

This document is valid without signature.

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