



# Code of Conduct



## PREAMBLE

The Nordzucker Values are the foundation of this Code of Conduct and the cornerstone of our culture. While the values guide us in our everyday work, the Code of Conduct uses them to provide more specific guidance in relation to a number of issues.

The Code of Conduct is by no means comprehensive. There will still be situations where it does not provide sufficient guidance. Then you will need to refer back to the values and your common sense or seek advice.

The operations of Nordzucker AG and the companies of the Nordzucker-Group (Nordzucker) are governed by this Code of Conduct, which is an overall umbrella for other Nordzucker policies and guidelines. Nordzucker expects employees at all levels and anyone acting on its behalf, such as agents, consultants and other business partners, to respect our Code of Conduct.

Where a local law or internal Nordzucker rules set higher standards than those set out in this Code of Conduct, these take precedence and must be adhered to. It is the employees' responsibility to know and understand this Code of Conduct and the laws applicable to their job responsibilities and to comply with both the letter and spirit of these laws.

All Nordzucker managers, including supervisors, act as role models by adhering to this Code of Conduct. Managers and supervisors have a duty to inform, encourage and monitor the people who report to them in relation to the Code of Conduct.

Should you have questions or need advice concerning the content, interpretation and application of the Code of Conduct, please consult your manager or contact a member of the Ethics Committee.<sup>1</sup>

Failure to comply will not be tolerated and may result in appropriate disciplinary action by the employer.

All employees are encouraged to act promptly when faced with violations of the Code of Conduct. Such cases can be reported to your manager or members of the Ethics Committee.

Any reprisal or retaliation against a person, who has reported a violation or suspected violation of the Code of Conduct in good faith, is prohibited.

---

<sup>1</sup> See [www.nordzucker.de](http://www.nordzucker.de)

## Business Integrity

### BRIBERY AND CORRUPTION

We refuse to offer, give or receive bribes or improper payments or participate in any kind of corrupt activity, either directly or through any third party.

### COMPANY ASSETS

We respect and protect Nordzucker's property and resources, both material and immaterial, and do not use them for any improper purpose.

### GIFTS AND HOSPITALITY

We ensure job-related gifts, meals or entertainment are reasonable, and we never offer or accept them if it may influence a business decision improperly or impair independence or judgement.

### CONFLICT OF INTEREST

We strive to avoid situations in which our personal interests or actions could conflict or appear to conflict with Nordzucker's best interests.

### COMPETITION

We commit to competition based on price, quality and service and only seek competitive advantage through lawful means.

### COMMUNICATION AND REPORTING

We communicate information about the company in a timely and accurate way, and we seek to inform and not mislead. We ensure that our financial and other reports and records are complete and accurate. We stand for truthful, transparent and reliable reporting within and outside the group.

### CONFIDENTIAL INFORMATION

We keep confidential information safe and do our best to ensure that it never gets into the wrong hands.

### THIRD PARTIES, AGENTS AND SUPPLIERS

We contract agents, other third party representatives and suppliers respecting standards consistent with our code.

## People

### DIVERSITY, FAIR TREATMENT AND LABOUR STANDARDS

We treat everyone equally and embrace difference.  
We respect labour standards and the freedom of organisation.

### HUMAN RIGHTS

We respect and protect human rights, do not tolerate forced labour  
and are against child labour.

### PRIVACY

We respect and protect everyone's privacy and comply with data  
protection and privacy laws.

### HARASSMENT AND DISCRIMINATION

We do not tolerate any kind of harassment or discrimination against  
anyone who works for us or with us.

### HEALTH & SAFETY

We make health and safety our first priority for everyone who works  
for us or with us.

## Role in the Society

### ENVIRONMENT

We are committed to protecting the environment and recognise our responsibility to improve our environmental performance continuously.

### AGRICULTURE

We are committed to working closely with our beet suppliers and helping them improve their sustainable farming practices.

### QUALITY, FOOD AND FEED SAFETY

We follow high quality and product safety standards and are committed to producing premium quality and safe products.

### CUSTOMERS

We always treat our customers with respect while striving to improve customer satisfaction continuously.

### NUTRITION, HEALTH AND WELL-BEING

We contribute to the nutrition debate by providing scientific facts on the role of sugar in a balanced and healthy diet.

### COMMUNITY

We respect the community around us, engage in societal issues, participate in public debates and have an active dialogue with our stakeholders.

### LOBBYING AND SPONSORSHIP

We engage in legitimate activities relating to both national and international policy formation and are transparent about our sponsorships.