



## Our Compliance Guidelines

valid for Griesson – de Beukelaer GmbH & Co KG  
and its affiliated companies

### Preamble

**Our actions are guided by integrity. This extends to dealings with customers and suppliers, employers, shareholders and the public.**

Our strategic considerations as well as our day to day business must always be based on high ethical and legal standards.

Each and every employee's personal composure, attitudes and actions at Griesson – de Beukelaer is important and contributes to the way our company is perceived by others - internally as well as externally. Inappropriate behaviour by even just one employee can inflict substantial damage upon the company. We all are obliged to pay attention to the public reputation of our company.

Honesty, sincerity and fairness guide our internal communications as well as our dealings with our partners and the public.

Striving for sustainable growth, we are not merely interested in the results, but also in how these results are achieved. Accordingly, we will never tolerate illegal or unfair practices or discriminating behavior to reach our goals. On the contrary, as signatories to the UN Global Compact, we embrace a value based and principled approach to our business that is committed to upholding human rights, labor laws and environmental standards as well as fighting corruption.

Our Compliance Guidelines contain binding rules which apply to all of us equally. They oblige us to act accordingly, and to refrain from any conduct that could contradict these rules.

Griesson – de Beukelaer

Andreas Land (Shareholder and member of the Board of Trustees)

Dany Schmidt (Chief Executive Officer)

Karl-Heinz Löhr (Chairman of the Joint Works Council)



## 1 Essentials

### 1.1 Compliance with the Law

For Griesson – de Beukelaer, compliance with all applicable laws takes the highest priority. We all are obliged to observe the statutory provisions of the legal system within which we are operating. Breaches of the law must be avoided under all circumstances. The same applies to any and all internal regulations the company has set for itself.

Every employee must expect disciplinary consequences in the event of a breach of his employment contract and/or these Compliance Guidelines, irrespective of the sanctions provided for by law.

### 1.2 Mutual Respect, Honesty and Integrity

We respect the dignity, privacy and personal rights of every individual. We work with people of different nationalities, cultures, religions, colours and sexual identity. We do not tolerate any discrimination or exclusion on the basis of sexual identity or other reasons, or any sexual or other harassment or abuse.

We are open, honest and stand by our responsibilities. We are reliable partners and only make promises we can keep.

These principles apply both to our internal cooperation and to our behavior towards external persons and must be strictly observed and adhered to by all employees.

As contact person for our staff, we have a Compliance Officer, as well as designated anti-discrimination, disability managers, and works councils at each site.

## 2 The Way We Work at Griesson – de Beukelaer

### 2.1 Management, Responsibility and Supervision

Our superiors bear responsibility for the employees entrusted to them. They must earn their respect by exemplary and personal behaviour, performance, openness and interpersonal skills. They shall set clear, ambitious, but realistic objectives, manage responsibly and grant their employees as much responsibility and personal freedom as possible. For this, Griesson – de Beukelaer has developed management principles that must be observed by every employee in a leadership position.

Employees with management responsibility shall at all times observe the regulatory, organizational and supervisory duties associated with their role. This also includes to actively communicate these Compliance Guidelines and to ensure that its rules are respected. They are personally responsible for ensuring that no breaches of laws and internal guidelines take place within their respective area of responsibility.



## 2.2 Freedom of Association and the Right to Collective Bargaining

Griesson – de Beukelaer recognizes the right of its employees to join trade unions.

There is a works council for all sites that represents the rights of the employees. This can be contacted confidentially by every employee.

## 2.3 Child Labour and Protection of Minors

Griesson – de Beukelaer condemns child labour (under 15 years) and any exploitation of children and young persons and requires its suppliers to make appropriate declarations. All regulations concerning the protection of young employees are respected. Young persons under 18 are not employed at night or in hazardous conditions.

## 2.4 Contracts, Wages and Working Hours

All work performed at Griesson – de Beukelaer is voluntary and is regulated by a labour contract. The costs of recruitment are borne by the employer. Every employee is free to leave Griesson – de Beukelaer with respect to the legal and / or contractual notice period.

Griesson – de Beukelaer is a member of the Association of the German Confectionery Industry and is thus bound by collective agreements. We ensure that our employees are not paid below the collectively agreed level. The minimum wage requirements are applied. Wages are paid on a monthly basis. For each payment, detailed and understandable information about the composition of their wages are provided to all employees.

Griesson – de Beukelaer does not make illegal or unauthorized deductions from wages, nor are deductions used as a disciplinary measure. Overtime is used and remunerated basing on applicable collective bargaining agreements and company agreements.

Working hours comply with the legal regulations (e.g. labor law, federal vacation law) and are defined in the employment contract. Overtime is applied in accordance with applicable legal requirements, collective agreements and/or voluntarily. These are agreed with the works council for special cases such as additional shifts.

## 2.5 Safety at Work

Our responsibility towards employees and colleagues offers the best possible prevention of accidents. This applies both to the technical planning of workstations, facilities and processes, and to safety management and personal behaviour in the everyday working environment. The working environment must meet the requirements of a health-oriented layout.

Every employee shares the responsibility for safety at work in his area. All the regulations on the protection of labour and safety at work must be strictly applied. Notifications by employees in respect of failings in safety at work must be investigated by the respective qualified personnel for safety at work.



## 2.6 Use of Company Property

We take the appropriate care when using the facilities and equipment of Griesson – de Beukelaer.

Unless regulated otherwise at company level or in the individual contract of employment, the equipment and facilities in offices and places of work (e.g. telephone, photocopier, PC/IT including software, machinery, tools) can only be used for business purposes. In no event may information inciting discrimination, the glorification of violence or other crimes, or which has illegal or sexually offensive content, be accessed or disseminated.

The use of private equipment for business purposes (e.g. taking photographs with private camera / video equipment, use of a private notebook) is not permitted, if not explicitly approved otherwise.

## 3 Dealing with Business Partners and other Third Parties

### 3.1 Unrestricted Competition

Griesson – de Beukelaer unequivocally commits to fair and unrestricted competition, and in particular to strict adherence to competition/antitrust law. Even the appearance of anti-competitive behaviour must be avoided.

All employees are obliged to comply with the applicable rules of fair competition. The Compliance Officer must be immediately made aware of any (internal or external) observed cases of non-compliance.

Collusive agreements and concerted practices between companies that restrict competition are prohibited. Even a mere exchange of information can be illegal.

Detailed information and rules for our employees regarding anti-trust and competition law compliance are further detailed in respective policies that must be observed by all employees.

### 3.2 Fight against Corruption

#### 3.2.1 General

Because of its power to destroy the economy and society as a whole, corruption cannot be condoned as an evil that inevitably has to be accepted. Corruption undermines citizens' trust in the integrity and functionality of the economy, and causes substantial damage to both businesses and the economy. Corruption within the meaning of these guidelines is any misuse of an official function (regardless of whether public office or private enterprise) to achieve an advantage for oneself or for a third party and also includes coercive practices.

Our aim is not only to consistently pursue any cases of corruption that occur, but also to take preventive measures to continuously counteract corruption.



Sensitivity to the dangers of corruption is necessary in all areas of work. Particular attention is required wherever information or decisions of particularly high material value are involved, for example if orders are placed, contracts signed or correct service provision is monitored or checked.

When there is specific suspicion of corruption, in other words indications of corrupt behaviour not just based upon vague suppositions, all employees must immediately inform the Compliance Officer.

### 3.2.2 Offering and Granting Favors

Griesson – de Beukelaer does not condone corruption. No employee may directly or indirectly offer or grant unjustified benefits or favors to others, including without limitation holders of public office and/or employees, officers or representatives of customers or suppliers, in connection with business activity, either as a monetary payment or in the form of other benefits.

Employees who conclude agreements with advisers, brokers, agents or similar third parties of Griesson – de Beukelaer must ensure that they do not offer or grant unjustified benefits or favors.

Gifts of biscuits in the form of presentation bags on special occasions can be given to customers, business partners and guests as a small gesture or sample. Care should be taken to ensure that no habitual right is derived from this, and that the focus is always on the positive image of the company. More detailed information is contained in the special internal regulations “Issuing gifts of biscuits”. Invitations can be issued to appropriate business meals.

### 3.2.3 Requesting and accepting Benefits, Gifts and other Favors

No employee may use his official position to request, accept or procure benefits or favors for himself or to have these promised to him. The acceptance of gifts and other favors is strictly prohibited.

So called untargeted advertising articles which are issued to customers in larger quantities (e.g. keychains, ballpoint pens, calendars, notepads, chocolate) and are of low value can be accepted and remain in the department. It is also permissible to accept customary invitations to meals. When in doubt, the Compliance Officer may be approached for advice, or a superior should be asked for approval. The same shall apply where gifts or favors cannot be rejected in view of the overall business relationship. In these cases, the final decision about the acceptance and use of such gifts and favors lies with senior management (Geschäftsführung).

## 3.3 Avoiding Conflicts of Interest

We make business decisions for the welfare of Griesson – de Beukelaer based strictly on matter of fact, company relevant considerations. In order to exclude conflicts of interest in our actions from the outset, the following rules apply:



- (i) Any personal or family interest that might exist in connection with the implementation of the employee's duties must be notified to the employee's disciplinary superior.
- (ii) When there is competition for orders, suppliers must not be unfairly preferred or hindered.
- (iii) Dealing with suppliers or other service providers who work for Griesson – de Beukelaer and also work or are going to work privately for the supervising employee should be avoided.
- (iv) Any secondary employment by an employee requires express prior consent from the personnel department of Griesson – de Beukelaer. A secondary employment for a company that also has business relationships with Griesson – de Beukelaer is not permitted.
- (v) If there is a perceivable risk for a conflict of interest, the employee concerned informs his superior promptly.

### **3.4 Money Laundering and International Trade Sanctions**

Griesson – de Beukelaer takes seriously the risks associated with money laundering, specifically the indirect support of criminal enterprises and financing or international terror, and complies with corresponding legal obligations, especially as required in the German Money Laundering Act (Geldwäschegesetz). This includes that related risks are analysed, customers are identified, employees are made aware of compliance risks, and cash deals are limited or made in compliance with applicable rules.

All employees must submit cash deals in the value of more than EUR 10,000.00 for prior approval to the Chief Financial Officer.

Griesson – de Beukelaer strictly observes any and all applicable trade sanctions and embargoes and actively controls that a transfer of goods and/or financial transactions are limited to such parties and countries that are not restricted by applicable laws.

## **4 Trade Secret and Data Protection**

### **4.1 Protection of Trade Secrets and Data Integrity**

The data and information entrusted to us has to be handled diligently. We know that the know-how and the trade secrets of Griesson – de Beukelaer itself as well as of companies dealing with Griesson – de Beukelaer are valuable and have to be protected.

Therefore, we observe our internal policies for the protection of confidential information and trade secrets. We only disclose internal information to third parties to the extent necessary and allowed.

The obligation to maintain confidentiality also applies after the termination of the employment relationship.



In order to ensure the necessary Data Integrity, all necessary and applicable policies and corresponding technical and organizational measures shall be strictly adhered to at all times. This includes, without limitation, diligently handling passwords, keys and mobile data carriers. Technical protective measures and devices, including Griesson – de Beukelaer’s established IT security measures, must be observed at all times and may not be circumvented under no circumstances.

The basis of every faithful and effective cooperation is a commitment to truthfulness. This applies equally to the relationship with shareholders, employees, customers, business partners and all official bodies. All records and reports that are prepared internally or issued externally must be correct and truthful. In accordance with proper accounting principles, data gathering and other records must always be complete, correct, timely and system-compatible.

## 4.2 Data Privacy

The protection of personal data and compliance with the data protection regulations applicable to Griesson – de Beukelaer is of special importance to us. We therefore comply with the European General Data Protection Regulation and the German Data Protection Act and ensure that the applicable principles and requirements for the processing of personal data are observed at all times.

We take all necessary measures to protect the personal data we collect or process. Personal data may only be processed insofar as this is necessary for specific, unambiguous and lawful purposes.

Griesson – de Beukelaer has appointed an external Data Protection Officer, who complements the Compliance Officer’s responsibilities and whose contact details can be found on the GdB website under “Privacy Policy”.

## 5 Sustainability and Social Responsibility

### 5.1 Environment and Technical Safety

The protection of the environment and its resources are company objectives of the highest priority. The persons with responsibility for the environment/safety in the production and technology area shall ensure compliance with the applicable laws and our high standards. Everyone must collaborate and contribute to achieving an exemplary performance in these areas.

### 5.2 Quality Management

Griesson – de Beukelaer attaches great value to the quality of its products and services. As a food manufacturer we are subject to a special duty of care and are bound by these defined quality guidelines. These duties are recorded in our procedure and working instructions and are binding on all our employees.



We undertake only to market foods that are safe and harmless to health. We pay particular attention to the use of unpolluted raw materials, careful baking processes and a high degree of hygiene throughout the production and supply process. At the same time, we do not use genetically modified raw materials.

In addition, the standards of our “Food Safety, Consumer Protection and Sustainability Code” apply to the whole of the company as a voluntary commitment.

### 5.3 Social Responsibility

We regard ourselves as a responsible relevant employer at our sites, and recognize the associated social and regional responsibility we have. This takes place by means of open communication and active commitment to the region. We are a part of public life in our regions and a constructive contact for society.

### 5.4 Responsibility for the Supply Chain

Griesson – de Beukelaer embraces its responsibility as part of the overall value and supply chain and is committed to complying with the human and environmental rights as required by the German Supply Chain Responsibility Act (Lieferkettensorgfaltspflichtengesetz). We use the necessary diligence in our dealings with business partners and their compliance with the applicable regulations and our Supplier Code of Conduct concerning production and working conditions.

Accordingly, we provide for an easily accessible complaint/whistleblowing mechanism that allows anybody to raise confidential and anonymous complaints against Griesson – de Beukelaer and/or our suppliers. We encourage and, where possible, require our suppliers to make their employees and business partners aware of these whistleblowing mechanisms.

## 6 Reporting Violations

### 6.1 General – Making a Complaint

Griesson – de Beukelaer is keenly interested in learning about and countering any noncompliant behaviour and therefore invites and encourages both employees as well as any other stakeholders to raise compliance concerns and come forward as whistleblowers.

All employees are encouraged and even obliged to speak up, if and when they have reason to believe that laws, these Compliance Guidelines, our Supplier Code of Conduct or other compliance regulations or policies applicable to Griesson – de Beukelaer, including regulations pertaining to food safety and product quality, are being breached or jeopardized.

The Compliance Officer serves as contact for the “Internal Reporting Channel” as required by the German Whistleblowing Act (Hinweisgeberschutzgesetz). But both anonymous as well



as confidential complaints may also be made to the external Ombuds Person appointed by Griesson – de Beukelaer.

Compliance complaints may also be made to the works council, the HR and the Quality Management departments, the appointed anti-discrimination managers and other channels as may be communicated internally or externally from time to time.

Any and all compliance reports and whistleblowing complaints shall be handled and managed diligently and in accordance with applicable laws. Nobody shall be punished or shall be subjected to other disadvantages for making a compliance report in good faith. Specifically, they shall not be subject to termination or disciplinary action.

## 6.2 Compliance Officer

Griesson – de Beukelaer has appointed a Compliance Officer as an internal and external contact, who also serves as “Internal Reporting Channel” as required by the German Whistleblowing Act (Hinweisgeberschutzgesetz) and advises senior management on compliance matters. The Compliance Officer monitors compliance with these Compliance Guidelines and serves as contact person for employees, business partners and other third parties in all compliance issues.

The Compliance Officer performs his tasks independently of instructions. He has a direct right to speak to senior management. The Compliance Officer shall treat confidential the reports, findings and the personal circumstances of whistleblowers as well as other persons accused or involved in compliance cases that come to his attention, including after the end of his service at Griesson – de Beukelaer. Files with personal data that are created in the course of the Compliance Officer’s work shall be treated like personnel files with regard to the necessary technical and organizational measures.

The contact details as well as an internet link allowing for multi-language, confidential and/or anonymous compliance/whistleblowing reports to the desk of the Compliance Officer can be found on the Teamnet or on the Griesson – de Beukelaer website under "Compliance".

## 6.3 External Ombudsperson

Griesson – de Beukelaer has appointed an external Ombudsperson in order to offer an additional channel for such whistleblowers amongst employees, business partners and other third parties who want to anonymously or confidentially report compliance violations of any kind, including without limitation cases of corruption, anti-competitive behaviour, discriminatory practices, or any other malfeasance or criminal acts.

The Ombudsperson only discloses such information to Griesson – de Beukelaer that has been approved by the whistleblower. The identity of the informant is only disclosed with the express consent of the whistleblower.

The contact details for the Ombudsperson and the link for anonymous complaints can be found on the Teamnet or on the website of Griesson – de Beukelaer under “Compliance”.

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