**CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS AND OTHER CONTRACTUAL PARTNERS OF BRÖKELMANN + CO - ÖLMÜHLE GMBH + CO**

**PREAMBLE**

Brökelmann + Co - Ölmühle GmbH + Co (hereinafter referred to as "Brökelmann + Co"), as a manufacturer of products with the highest quality standards, is aware of its ethical, social and ecological responsibility along the entire value chain.

The behaviors set forth in this Code of Conduct define the general requirements placed on suppliers, subcontractors and other contractual partners (hereinafter referred to as "business partners"). They relate in particular to responsibility towards people and the environment and define non-negotiable minimum social, ethical and ecological requirements.

Brökelmann + Co is aware that the implementation of responsible production methods and sustainability requirements are dynamic processes and therefore encourages business partners to continuously improve their work processes. Brökelmann + Co looks forward to an open dialogue about the fulfillment of the requirements in this Code of Conduct and the improvement of processes along the supply chain.

PRINCIPLES

This Code of Conduct aims to present the basic requirements for Brökelmann + Co's business partners with regard to their responsibility concerning ethical, social and environmental aspects. The business partner of Brökelmann + Co hereby declares to comply with:

- the law of the applicable jurisdiction(s),

- accounting and competition law,

- local national law and EU law including EUMR (European Convention on Human Rights).

The Code of Conduct is based on national laws and regulations such as the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) and the following international conventions:

- Universal Declaration of Human Rights,

- United Nations human rights covenants,

- Core Labor Standards of the International Labor Organization (ILO).

1. Ethocal business conduct
	1. Quality requirements

Brökelmann + Co and its business partners are committed to compliance with the objectives of the respective quality policy. The maintenance of the certified standards, the further development of the quality management and the quality improvement are continuously worked on. Compliance with legal and internal regulations in the field of food and feed safety is a matter of course. The safety, conformity, legality and authenticity of the products present the guideline of the daily actions. These quality guidelines are observed by all employees.

* 1. Corruption prevention

Business partners of Brökelman + Co do not tolerate any form of corruption and comply with international and, if applicable, national anti-corruption laws and standards.

Accordingly, the acceptance of all gifts and gratuities from business partners and suppliers must be coordinated with the supervisor.

* 1. Money laundering

Brökelmann + Co only cooperates with reputable business partners who act within the framework of applicable laws and do not use illegal financial means. Business partners comply with all laws prohibiting money laundering or the financing of illegal or unlawful purposes and only do business with reputable business partners, i.e. business partners who conduct legal business with funds from legal sources.

* 1. Cartel and competition law

Brökelmann + Co's business partners comply with all national and/or international competition and cartel laws. Fair competition is maintained and promoted in the respective business environment. Agreements and practices that are detrimental to competition are avoided: Each business partner of Brökelmann + Co refrains from participating in anti-competitive agreements and from exploiting or abusing a possibly existing dominant position in violation of the respective applicable competition rules.

* 1. Confidentiality and data protection

The business partners comply with the applicable data protection regulations. Personal data is only processed in a lawful manner and the rights of the data subjects are preserved. Appropriate technical and organizational measures are taken to ensure adequate and lawful data protection.

* 1. Export and import

Brökelmann + Co's business partners comply with the relevant import and export control laws, in particular sanctions and embargoes.

* 1. Tax compliance

Compliance with all tax rights and obligations is important for Brökelmann + Co and its business partners. This includes the timely payment of taxes and duties, as well as regular training of employees in the relevant areas to ensure the timely fulfillment of tax obligations.

1. Social Responsibility

Brökelmann + Co's business partners comply with the labor laws applicable to them and ensure the employment and working conditions recommended by the International Labor Organization (ILO).

With regard to the following contents, Brökelmann + Co is guided, among others, by the Act on Corporate Due Diligence Obligations in Supply Chains (LkSG) applicable in Germany, even if Brökelmann + Co does not fall within its scope of application.

* 1. Prohibition of child labor

Business partners shall avoid any form of child labor in their business operations and respect the right to education. The permissible minimum age of employees is based on the end of compulsory schooling in accordance with the applicable law of the place of employment; however, the age of employment may not be less than 15 years. If a national regulation concerning child labor provides for stricter standards, these shall be adhered to as a matter of priority.

* 1. Exclusion of forced labor

There shall be no use of forced labor, slave labor, or any such comparable labor. All work is voluntary and without threat of punishment. Employees may terminate work or employment at any time. Accordingly, business partners treat their employees with dignity and respect. Sanctions, fines, other penalties or disciplinary measures will only be taken in accordance with applicable national and international standards and internationally recognized human rights.

* 1. Fair remuneration

The business partners shall regularly pay its employees an appropriate wage that at least corresponds to the minimum wages stipulated by law or collective agreement in the respective region. Legally unjustified wage deductions are not permitted. Business partners shall ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

* 1. Fair working time

The business partners shall comply with the applicable national statutory and/or collectively agreed regulations on working hours. Overtime is only permitted if it is performed voluntarily. The maximum number of hours stipulated by law shall not be exceeded.

* 1. Freedom of association

Brökelmann + Co's business partners respect the right of employees to form, join and act on behalf of associations or organizations of their choice to promote and protect the interests of employees and to engage in collective bargaining regarding the organization of labor relations. Formation of and membership in a trade union shall not result in discrimination in the workplace.

* 1. Prohibition of discrimination

Discrimination and unequal treatment of employees are inadmissible in any form unless they are justified in the requirements of employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin color, disability, health status, political conviction, origin, ideology, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each individual are respected.

* 1. Health protection, safety at work

The safety and preservation of the health of all employees is a top priority for Brökelmann + Co. The business partners comply with the health and safety regulations applicable to them. They also take all necessary measures for a safe, healthy and hygienic working environment, thus ensuring safe working conditions. In addition, the business partners work on the continuous improvement of occupational health and safety management.

* 1. Forced eviction and expropriation of land

Business partners shall refrain from unlawful evictions and unlawful taking of land, forests and waters in the acquisition, development or other use of land, forests and waters, the use of which provides a person's livelihood.

* 1. Protection of local communities and indigenous populations

Business partners have a responsible approach to land tenure, meaning they respect the legal and customary land rights of local and indigenous populations and obtain the free, prior and informed consent of these groups to use their land.

* 1. Natural resources

The activities of the business partners do not cause excessive harmful soil alteration, water pollution, air pollution, harmful noise emissions or excessive water consumption that would

- significantly affect the natural basis for food preservation and production,

- impede a person's access to safe drinking water and sanitation, or

- harm the health of a person.

* 1. Human rights protection in the use of security forces

Business Partners shall refrain from hiring or using private or public security forces to protect a business project if, due to lack of guidance or control by the business partner, there is a risk that the security forces will be used in violation of internationally recognized human rights.

1. ECOLOGICAL RESPONSIBILITY

Brökelmann + Co strives to conduct business in a manner that promotes environmental quality. Brökelmann + Co and its business partners adhere to the following measures/actions:

* To drive continuous improvement of the management system and energy-related performance, as well as sustainable development in all environmental matters and energy issues, and to provide the necessary resources for this within the scope of economic possibilities.
* To comply with environmental and energy legislation and the requirements of plant permits applicable to processes, products and services.
* Operating an open information policy towards employees and authorities.
* Procuring energy-efficient services and products (within the scope of technical possibilities and if economically justified) and saving energy in its own processes, products and services.
* The avoidance or reduction of emissions, the minimization of waste and the reuse or recycling of used materials.
* The extensive minimization or elimination of environmental risks.
* The effective compliance with the set energy policy targets.

Business partners shall take appropriate measures to ensure that the impact of business activities on the community, natural resources and the environment is minimized and actively take and implement measures to promote environmental protection. Business partners comply with applicable local and internationally recognized environmental standards and laws and ensure that all required environmental permits and approvals are in place, valid, up to date, and adhered to. Business partners avoid or reduce environmental impacts from resource and energy consumption, emissions of greenhouse gases and air pollutants, water consumption, discharges to soil and water bodies, and the resulting waste continuously.

In addition, the business partners of Brökelmann + Co comply with the following conventions:

* the requirements of the Minamata Convention regarding the manufacture of mercury-containing products, the use of mercury in manufacturing processes, and the treatment of mercury waste,
* the Stockholm Convention's restrictions on the production and use of persistent organic pollutants (POPs) and their handling and disposal; and
* the transboundary movement (import and export) of hazardous wastes prohibited under the Basel Convention.
1. IMPLEMENTATION, KNOWLEDGE AND AGREEMENT OF THE BUSINESS PARTNER
	1. Supplier management

With regard to the topics addressed in this Code of Conduct, Brökelmann + Co's business partners ensure that they identify risks in their supply chain and take appropriate measures. In case of suspected violations as well as to safeguard supply chains with increased risks, business partners shall inform the company promptly and, if necessary, regularly about identified violations and risks as well as the measures taken.

* 1. Compliance with the Code of Conduct for business partners

Business partners shall follow the principles of this Code of Conduct, communicate them to their supply chain and business partners and make reasonable efforts to ensure that they comply with these principles. If a business partner does not comply with the requirements of this Code of Conduct, it shall openly discuss corrective actions with Brökelmann + Co. If the business partner is unwilling or unable to implement corrective measures, Brökelmann + Co is entitled to terminate the business relationship and relevant contracts with the business partner. Should the business partner from a contractual relationship with Brökelmann + Co be subject to specifications which contain more concrete regulations than this Code of Conduct, the contractual regulations shall take precedence.

* 1. Monitoring

Brökelmann + Co reserves the right to verify compliance with the above requirements either itself, by independent third parties in the course of audits or by inspecting formal certifications.

* 1. Whistleblower system

Compliance and ethics violations can be reported to the external ombudsman. The ombudsman acts as an external and thus neutral contact for (also anonymous) reports from employees.

Hamm, 29.01.2024

General Management