



# Code of Conduct of the Südzucker Group

Together as **Südzucker Group**, we contribute to an enjoyable, healthy, and sustainable world based on the power of plants.



# Dear colleagues,

a company's reputation is only as good as the behaviour of its employees. Each and every one of us contributes to how our company is perceived by our customers, our investors, the society and also how we are perceived as colleagues.

We have drawn up this Code of Conduct to help us act responsibly, appropriately and in compliance with the law in our day-to-day work and especially in critical situations. It sets out our common basic understanding of the way in which we want to work together and be successful in the market, based on applicable law. The

Code of Conduct is binding for the Executive Board, the managing directors, all executives and employees throughout Südzucker Group. Please familiarise yourself with the contents.

Most of the topics addressed in our Code of Conduct will be self-evident to you. Applicable laws, international standards, company regulations, obligations arising from the employment relationship, internal policies and values of the Südzucker Group are summarised here.

As committed employees with integrity, you play a decisive role in the success of our company. Responsible behaviour is the prerequisite for long-term economic success.

Let us take responsibility together for the successful future of Südzucker Group.

**Mannheim, March 2026**



Dr. Niels Pörksen



Stephan Büttner



Dr. Theresa von Fugler



Hans-Peter Gai



Dr. Stephan Meeder

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In the interest of good readability, we do not apply gender differentiating language entirely. The chosen form always includes both female, male and other persons.



**We are reliable:  
with each other  
and our contacts**



# Our Code of Conduct is binding.

All board members, managing directors, executives and employees must comply with its requirements and principles. The obligation to comply with the Code of Conduct arises directly from the applicable laws, company regulations, corporate guidelines and obligations arising from the employment contract. Violations of the Code of Conduct may have consequences under labor law. We also expect our suppliers and contractual partners to behave in accordance with the requirements set out in this Code.

Compliance with our Code of Conduct as well as legal requirements and internal company guidelines are an essential part of our company's appearance as a credible and reliable partner. We have integrated internal controls into our management systems to detect violations of the principles listed here. Where necessary, we train those involved or take measures to prevent future violations.

You may become aware of actions that are inconsistent with our Code of Conduct. Raise your questions or concerns openly with your supervisor, the Works Council or the Compliance Officer. You will receive the necessary support, and you will not experience any disadvantages! All employees who request advice or surface misconduct in good faith comply with the rules of this Code of Conduct and are protected as whistleblowers.

However, if you have any concerns, the "Südzucker Compliance Line" at <https://suedzuckergroup.integrityline.app/> provides you with a confidential, optionally anonymous, procedure to report serious incidents to Südzucker AG's chief compliance officer. Please use this system responsibly and only pass on information that you are convinced is correct to the best of your knowledge and belief.

If it is required by law to set up local channels for whistleblower reports, these are available on the intranet of the respective subsidiary. They are also available on the Group website ([www.suedzuckergroup.com](http://www.suedzuckergroup.com)) and on the websites of the relevant subsidiaries.

Information relating to the whistleblowing system, current 'Compliance Lines' and other electronic reporting channels is available to our employees on our intranet at **My Work - Legal Regulations - Compliance - Whistleblowing System.**





**We treat our employees  
fairly and with respect**





# We are acting responsibly and respect human rights

both in our own business operations and throughout our supply chains.

Respecting the applicable human rights legislation, regulations and the following international standards is an integral part of our corporate responsibility:

- The Universal Declaration of Human Rights of the United Nations (UN)
- The United Nations Guiding Principles on Business and Human Rights (UNGPs)
- The Children's Rights and Business Principles (UNICEF, United Nations Global Compact)
- The conventions and recommendations of the International Labor Organization (ILO) on labor and social standards
- The OECD Guidelines for Multinational Enterprises

We expect everyone to respect the dignity and personal rights of all individuals. Südzucker Group's Declaration of Principles on Respect for Human Rights ([www.suedzuckergroup.com](http://www.suedzuckergroup.com) -> **Human Rights**) defines our commitment to upholding and promoting these rights across our business activities.



# We do not accept **any form of child labour, forced or compulsory labour.**

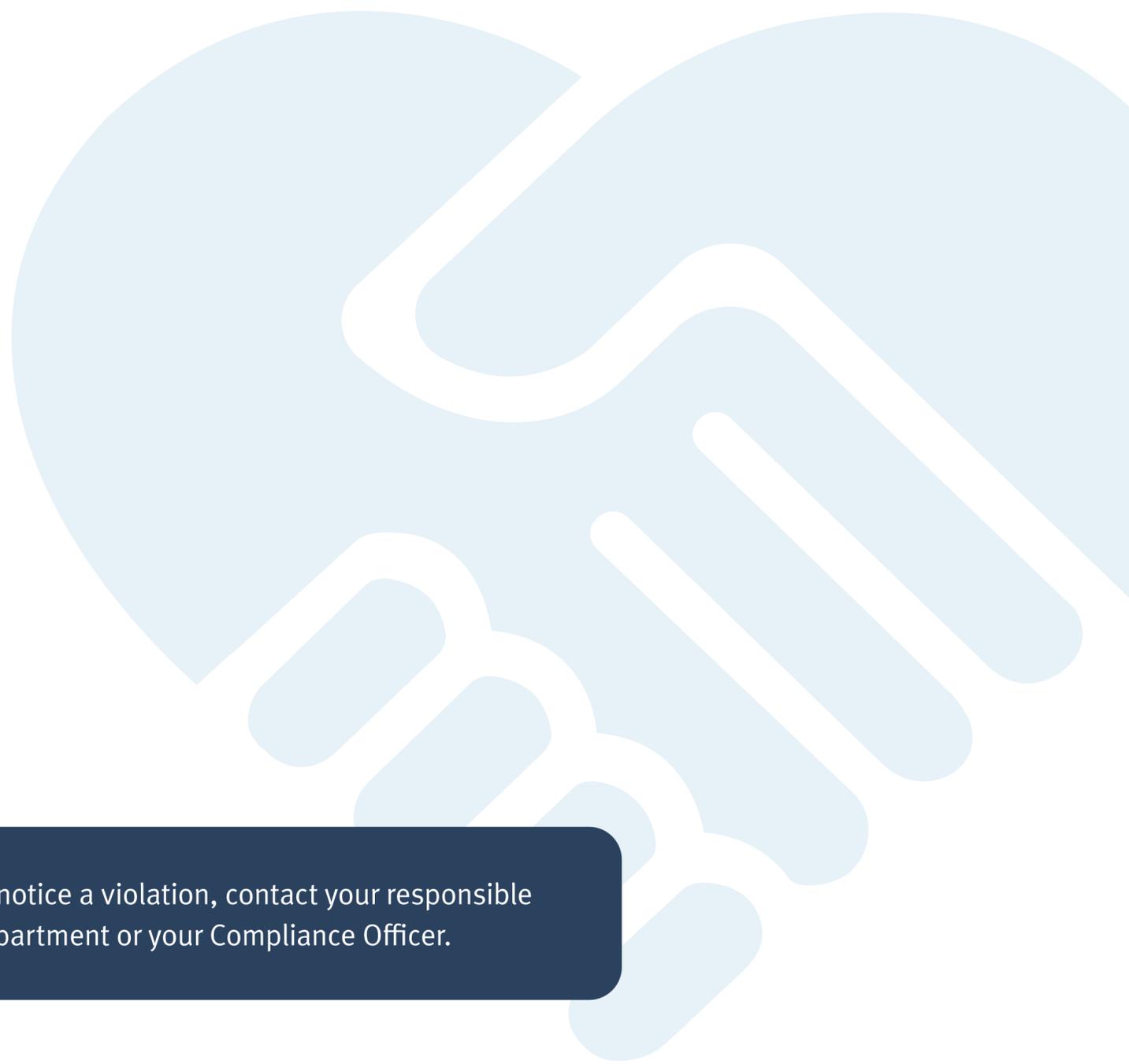
In line with ILO Conventions 138 and 182, we define child labour as work performed by minors that has negative consequences for their mental, social and health development and that violates children's fundamental rights to education, health, protection and participation.

Forced labour is any activity to which people are compelled against their will under threat of punishment or other serious harm.

We comply with all relevant national and international laws, rules and regulations, as well as applicable international standards.



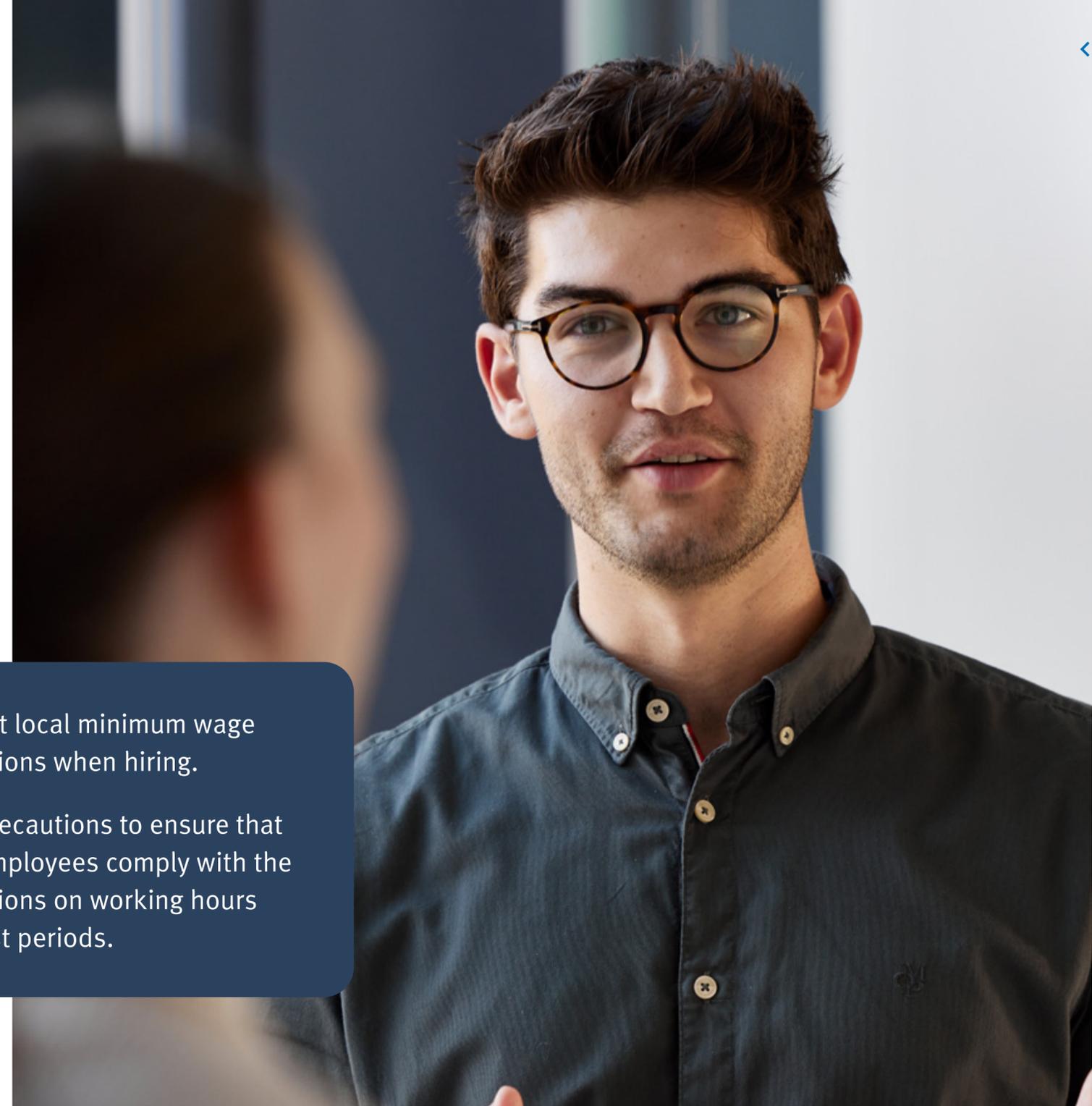
✓ If you notice a violation, contact your responsible HR department or your Compliance Officer.



# We comply with the **labour laws** applicable in the respective countries.

Everyone has the right to fair remuneration for their work that enables them to enjoy a decent standard of living. The remuneration paid to employees must comply with all applicable laws on wages and salaries, including the provisions on minimum wages, overtime, statutory benefits, working hours and paid holidays. Deductions from wages are only permitted if they are legally permissible and reasonable. We make all legally regulated contributions to social insurance or other legally regulated benefits.

- ❗
- ✓ Respect local minimum wage regulations when hiring.
- ✓ Take precautions to ensure that your employees comply with the regulations on working hours and rest periods.



# Safety and health in the workplace is a priority for us.

We ensure safe and hygienic working conditions that comply with the applicable legal requirements in the area of health and work safety. We continuously improve our work processes and working conditions to reduce the risk of accidents. We ensure that our employees are aware of the applicable laws, regulations and internal company guidelines on work health and safety. Regular training courses on health and safety at work are held. In addition, the work organisation ensures that the necessary work breaks are taken so as not to endanger the safety and health of employees.

**SAFETY FIRST**  
*Because You matter.*



- ✓ Realise that each of us is responsible for safety.
- ✓ Comply with workplace health and safety guidelines and follow all safety regulations.
- ✓ Act in a considered, prudent and careful manner so that nobody is put in danger. If a hazard occurs, ensure that the problem is rectified immediately and that colleagues are informed accordingly.
- ✓ Make suggestions for improvement if you notice any weaknesses in our safety standards.
- ✓ Report safety-related incidents, violations or safety deficiencies in the working conditions to your supervisor, your safety expert or your works council.





# We respect the freedom of association

and thus the right of all employees to form and join local, national or international associations or organisations. We recognise the right of employees to collective bargaining and respect the rights of trade unions. Employees and their representatives must not suffer any personal or professional disadvantages as a result of exercising these rights. This includes the right of employees to take collective action (including the right to strike) in the event of conflicts of interest. The exercise of this right may only be subject to such restrictions as are provided by law and are necessary in a democratic society in the interest of national security or public order or to protect the rights and freedoms of others.



Liability

**Respectful behaviour**

Environment & sustainability

Integrity in business dealings

Product quality and safety

Protection of information

Communication

# We are committed to diversity and inclusion

and do not tolerate any discriminatory or harassing actions in our company. As a company, we have signed the Diversity Charter. We stand for a zero-tolerance policy towards discrimination of any kind, for example on the basis of social or national origin, gender, ethnic origin, religion, age, illness or disability, sexual orientation, political conviction or other personal characteristics. Each and every individual is entitled to fair and respectful treatment.

- Treat your colleagues with respect and fairness.
- Respect the principles of equal opportunities and non-discrimination.
- Maintain fair and factual interactions and promote trusting cooperation.



**!** ✓ If you feel discriminated against or harassed, address this to the person concerned. If you do not wish to address the person directly, contact your supervisor, your Compliance Officer, your human resources department, or the Works Council without hesitation. This will not be of disadvantage for you.



# We strive to find an appropriate balance of interests.

Our aim is an appropriate balance between the economic interests of our company and the private interests of our employees. The resulting satisfaction and motivation of our employees contribute significantly to the success of the company.



Liability

**Respectful behaviour**

Environment & sustainability

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Communication



**We act responsibly  
towards our environment**

# Sustainability is traditionally an integral and practised part of our corporate strategy.

In order to maintain the company's economic basis in the medium and long term, it is necessary to ensure the long-term availability of these raw materials. The core of our business model is the processing of agricultural raw materials into high-quality products.

Our actions along the entire value chain, from agricultural raw materials to the finished product, are geared towards sustainability in all parts of the company and regions and at all levels – from management to each individual employee.

We take care to minimise resource requirements, including energy use and emissions, water consumption and wastewater, as well as waste and potential environmental impacts at our sites and in the value chain. All processes and standards must at least fulfil or exceed the legal requirements. Land use must be compatible with nature and the landscape and take place within the laws on nature conservation, property rights and land use rights.



- ✓ Comply with the applicable environmental, energy and agricultural legislation in your area.
- ✓ Use natural resources responsibly and protect the environment in your work area.
- ✓ Each of us shares responsibility for reducing energy consumption, greenhouse gas emissions, water consumption and waste.



**We maintain  
integrity in our  
business transactions**



# We do not tolerate corruption or bribery.

Our business relationships should be based solely on objective criteria. We expect the same from our suppliers and have formulated this in the Code of Conduct for Suppliers ([www.suedzuckergroup.com](http://www.suedzuckergroup.com) -> **Documents for suppliers**).

In addition to quality, reliability and competitive prices, this also includes compliance with ecological and social standards as well as the principles of good corporate governance.

The acceptance and granting of gifts, invitations and donations must be carried out in accordance with our Group Policy on Anti-Corruption and Conflicts of Interest (Anti-Corruption Policy), which regulates this area in terms of appropriateness, approvals, reporting channels and documentation. We also undertake to comply with the relevant country-specific anti-bribery and anti-corruption laws and regulations. This guideline and other recommendations for preventing corruption are available on our intranet under **My Work - Legal Regulations - Compliance - Anti-Corruption and Conflicts of Interest**.



- ✓ Please note that approval must be obtained and granted in advance and must be clearly documented and retained.
- ✓ Please note the value limits in our Anti-Corruption Policy and the associated approval criteria.
- ✓ Accepting or giving cash or invitations of an indecent or sexual nature is never permitted.
- ✓ Ensure that invitations and gifts cannot be construed as unlawfully influencing business decisions. This also includes favours to public officials or representatives of authorities.
- ✓ If in doubt, consult your supervisor or contact your responsible Compliance Officer.



# We expect **integrity and loyalty** from all employees

within the scope of their employment. You act exclusively in the interests of our company. To avoid conflicts of interest, private, family or personal economic interests are always kept separate from the economic interests of the Südzucker Group.

Even in personnel decisions or business relationships with third parties, only objective criteria count. Our Group Policy on Anti-Corruption and Conflicts of Interest (Anti-Corruption Policy) contains corresponding regulations on conflicts of interest and sets out reporting mechanisms that must be observed.



- ✓ Do not invest in companies of a supplier, cooperation partner or customer without informing your supervisor in advance.
- ✓ Disclose existing or potential conflicts of interest to your supervisor and look for a solution together.
- ✓ Secondary employment for a competitor is prohibited.



# We do not tolerate any activities in connection with money laundering.

We expect the same from our suppliers and have laid this down as part of the Code of Conduct for Suppliers ([www.suedzuckergroup.com](http://www.suedzuckergroup.com) -> **Documents for suppliers**).

In accordance with the Group Policy Corporate Treasury, money transactions in the Südzucker Group should generally be carried out non-cash. This guideline is available on our intranet at **My Work - Downloads - Guidelines**. We carefully check the identity of customers, service providers, consultants and other third parties with whom we maintain or initiate business relationships.

In compliance with national and international laws, we ensure that transactions with third parties do not violate trade regulations such as economic embargoes, import and export control regulations or applicable regulations to prevent the financing of terrorism. The requirements and principles of the foreign trade control system are set out in the Group Policy on Foreign Trade Control. This guideline is available on our intranet at **My Work - Legal Regulations - Compliance - Foreign Trade Control and Sanctions**.



- ✓ Observe the legal requirements, particularly in the areas of foreign trade and export control law, tax and customs law, money laundering laws and anti-terrorism laws.
- ✓ Please observe the requirements outlined in the Group Policy on Foreign Trade Control.
- ✓ Please note our requirements on cash transactions in the Group Policy Corporate Treasury.
- ✓ If you notice unusual requests from business partners or irregular payment processes, please contact the responsible finance department or the Corporate Risk Manager and inform your Compliance Officer.



# We act as a fair and responsible competitor in the market

and are fully committed to complying with the applicable competition and antitrust laws. We expect the same from our suppliers and have laid this down as a part of the Code of Conduct for Suppliers ([www.suedzucker.com](http://www.suedzucker.com) -> **Documents for suppliers**).

We do not participate in agreements or arrangements with other companies that violate competition or antitrust law and that have the purpose or effect of restricting or preventing competition. The Policy on Competition Law Compliance (Competition Policy) must be respected by every employee and is available on the intranet at **My Work - Legal Regulations - Compliance - Antitrust law**.



- ✓ Meetings with competitors (e.g. meetings, association meetings or phone calls) must be documented using the form available on the intranet. The corresponding report must be sent to the responsible legal department, the responsible compliance officer and the respective supervisor.
- ✓ When contacting competitors, always ensure that no information is received or passed on that allows conclusions to be drawn about the current or future market behaviour of the information provider and that is not freely available to the public.
- ✓ Do not enter into any agreements with our competitors on prices, discounts, quantity restrictions, capacities, allocation of markets and customers or on terms and conditions of sale or purchase.
- ✓ Observe the ban on so-called vertical agreements between suppliers and customers and prevent, for example, exclusivity agreements or restrictions on our customers' freedom to set prices and delivery conditions for their business partners.
- ✓ Ensure that all contracts and agreements that could raise antitrust issues are reviewed by our legal department.
- ✓ It is sometimes difficult to distinguish between authorised and prohibited actions, especially in operational business. If you have any questions or uncertainties, please contact the legal department.





# Our relationships with our partners are fair and respectful

and based on mutual trust. Those Business relationships form the basis for Südzucker Group's entrepreneurial success.

We provide our customers with reliable and customer-orientated products. In doing so, we cater to the requirements and needs of our customers. This is how we create the basis for a high level of customer satisfaction. Suppliers and service providers are selected carefully, according to objective and comprehensible criteria and on the basis of comparisons of offers.

A **code of conduct for suppliers** has been derived from the Südzucker Group's code of conduct for cooperation with our suppliers. This is an integral part of all contracts concluded by our central purchasing department. It includes guidelines for Südzucker Group's business partners, suppliers and their upstream suppliers and is available on Südzucker Group's website ([www.suedzuckergroup.com](http://www.suedzuckergroup.com) -> **Documents for suppliers**). As a rule, payment for deliveries and services received is made directly to the respective contractual partner and to the country in which the latter has its registered office. We always aim to pay our suppliers and service providers within the agreed payment terms.



# We protect our company's assets,

including all tangible and intangible assets. We expect all employees to protect business assets and use them exclusively for company purposes.

This includes intellectual property as well as all processes, products and designs developed by our employees and used in our company.

We also respect the property rights and intellectual property granted to third parties.



- ✓ Handle our company's property with care. Use it exclusively for company purposes and protect it from loss, damage, theft and misuse.
- ✓ Act in a cost-conscious manner. Check whether expenses are reasonable and necessary. Only the efficient use of all company resources – including working hours – can ensure the operational and financial performance and long-term success of our company.
- ✓ Respect the patents, trademarks and property rights of third parties and do not use them without authorisation.
- ✓ Do not copy or use any documents protected by copyright without prior authorisation.





**We stand for product  
quality and safety**

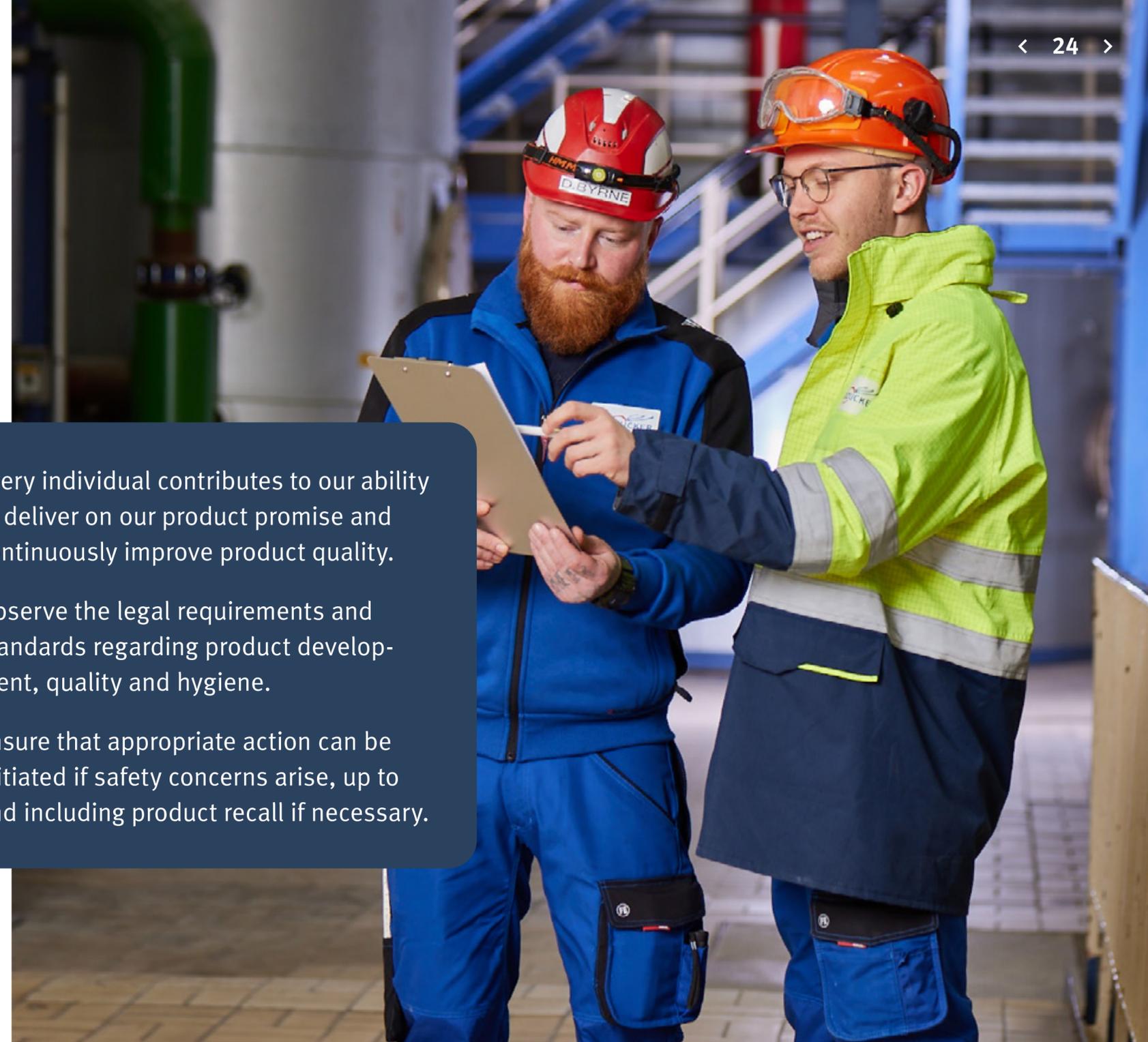


# We produce safe products of high quality.

We are aware of our responsibility as a manufacturing company and supplier of food, feed and biofuel and produce safe, high-quality products. Compliance with all relevant national, European and international regulations on quality and hygiene for the food, animal feed and biofuel industries and for agriculture, as well as self-imposed requirements, has the highest priority. This applies to Südzucker Group's products as well as its work and production processes and associated supply chains.



- ✓ Every individual contributes to our ability to deliver on our product promise and continuously improve product quality.
- ✓ Observe the legal requirements and standards regarding product development, quality and hygiene.
- ✓ Ensure that appropriate action can be initiated if safety concerns arise, up to and including product recall if necessary.



Liability

Respectful behaviour

Environment & sustainability

Integrity in business dealings

**Product quality and safety**

Protection of information

Communication



**We protect our  
information**





# We protect all company information

as well as information from and about our business partners and treat it confidentially. Confidential information is one of our most valuable assets. Company and business secrets must not be disclosed to third parties or even made public.

Confidential information includes for example:

- Sales figures for products
- Plans of production processes
- Investment plans
- Forecasts on earnings and market developments
- Negotiated product or supplier prices
- Information about inventions and research results





# We protect personal data.

As part of our daily business activities we process personal data. We do this fairly, in a transparent manner, for a specific purpose and exclusively within the framework of the applicable legal requirements.

We take appropriate technical and organisational measures to adequately protect personal data. The processing of personal data is carried out in a manner that is comprehensible to the data subject and is an important part of our business integrity.



- ✔ Please note that personal data may only be processed with consent, within the scope of contract fulfillment, on a legal obligation, and/or for the purpose of the legitimate interests.
- ✔ When commissioning third parties, make sure whether a data protection agreement is also required.
- ✔ Ensure a transparent information and communication regarding the processing of personal data and compliance with the rights of data subjects.
- ✔ Assure that personal data in your area is protected against unauthorised access by third parties.
- ✔ If in doubt, please contact the responsible data protection officer.

# We treat insider information as strictly confidential.

Insider information is any precise information that is not publicly known, relates directly or indirectly to an issuer/publisher/issue of financial instruments or to the financial instruments themselves, and is likely, if it becomes known, to have a significant effect on the stock exchange or market price of the financial instruments.

Employees who have access to inside information are required to comply with a fundamental and binding prohibition against trading in financial instruments of our company. It is prohibited to disclose inside information to third parties or to recommend the purchase or sale of our securities or other financial instruments of our company. The ban applies until the information loses its status as insider information. Every employee must comply with our Group Policy on the Treatment of Inside Information, which is available on the intranet, as well as the overview of the intra-company blackout period for financial instrument trading at **My Work - Legal Regulations - Compliance - Capital market compliance and Insider database.**



- ✓ Adhere to the intra-company blackout period prior to each publication of quarterly figures, an interim report or the annual financial statements.
- ✓ If you are listed as an insider, you do not acquire or sell any of our company's financial instruments for yourself or for others.
- ✓ Observe our insider compliance rules for handling insider information of our company.
- ✓ If in doubt or if you have any questions, please contact the Head of Capital Market Compliance or contact the responsible Compliance Officer.



**We communicate  
transparently  
and correctly**



# We value clear, fact-based and open communication.

We maintain a fact-oriented and polite tone with all internal and external contacts.

Our employees are regularly informed by the Executive Board and management, for example at work council meetings and departmental meetings or through internal newsletters, the intranet and employee magazines.

Enquiries about our company or products will only be answered by the respective departments.



- ✓ Avoid wording that contains questionable or inappropriate statements. Please always carefully consider what you communicate in your emails.
- ✓ Do not make any public statements on behalf of our company. Always refer requests for statements to the responsible communications department.
- ✓ Ensure that information about our company as well as our products is presented correctly and understandably.



# Our accounting and financial reporting are carried out in an orderly, correctly, timely and transparent manner

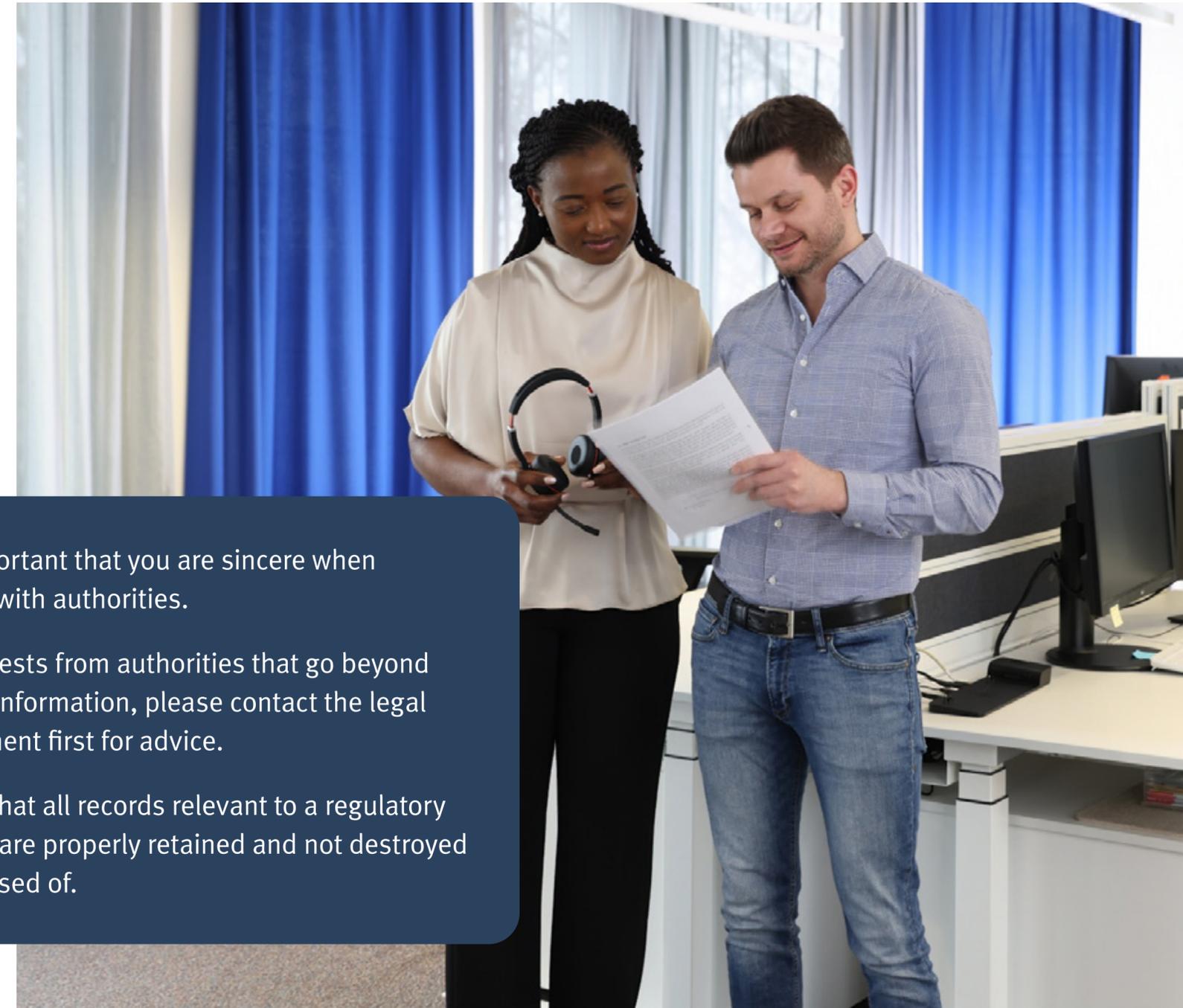
and in accordance with the relevant statutory regulations and standards. In addition, key business processes must be appropriately documented as part of an internal control system. This must ensure the complete and correct recording of information relevant to accounting.

- ✔ Ensure that the disclosure of facts in reports, documents and all other publications is complete, correct, accurate, timely and understandable.
- ✔ Ensure compliance with accounting regulations on the basis of our standardised processes.
- ✔ Maintain your records carefully and keep them in compliance with the laws and regulations.
- ✔ Work cooperatively with internal and external auditors.



# We strive to maintain an open and cooperative relationship with all relevant authorities.

Information is provided in a complete, truthful, timely and comprehensible manner. Likewise, we pay attention to open dialogue at municipal and local level in the regions where our sites are located.



- ✓ It is important that you are sincere when dealing with authorities.
- ✓ For requests from authorities that go beyond routine information, please contact the legal department first for advice.
- ✓ Ensure that all records relevant to a regulatory request are properly retained and not destroyed or disposed of.



# SÜDZÜCKER GROUP

SÜDZÜCKER  
SUGAR DIVISION

beneo

Freiberger

PORTIONPACK  
GROUP

cropenergies

SÜDZÜCKER

SÜDZÜCKER  
POLSKA

SÜDZÜCKER  
MOLDOVA

SAINT  
LOUIS  
SUCRE



SÜDZÜCKER  
IBÉRICA

SÜDZÜCKER  
UNITED KINGDOM

Chabert  
Gullit

FELIX KOCH OFFENBACH  
Coulon und Karamel GmbH

SÜDZÜCKER  
HELLAS

MAXI  
your quality partner

meatless  
a brand of beneo

HASA



RICHELIEU  
FOODS, INC.

STATESIDE  
FOODS



HELLMA

SAES  
PASSION FOR PORTIONS

Portion  
Solutions

WSD  
COLLABORATIVE PACKING SOLUTIONS

CDLC

cropenergies

biowanze

ensus

ryssenalcools

advanced  
bioenergies

biobased  
chemicals