



Code of Conduct

“As a strong cooperative organisation, we are the right partner for healthy nutrition, with a focus on quality and sustainable growth.”

In order to implement our vision, it is necessary that we integrate defined fundamentals and principles into our daily thinking and action. This Code of Conduct specifies a framework for this and reflects the values of the Erzeugergroßmarkt Langförden-Oldenburg eG (ELO eG for short).

1. Our corporate principles

Based on our corporate vision, we have defined fundamental principles which create the foundation for fair interaction with each other:

Respect

We treat each other in the way we ourselves want to be treated. We are open and honest. We therefore interact appreciatively, respectfully and fairly.

Responsibility

We keep our word, are reliable, and independently accept responsibility for a task until it is taken on by someone else.

Clear communication

We provide timely, constructive feedback.

We actively improve

We are solution-oriented and strive for continuous improvement. We factually and directly criticise processes, procedures and conduct – but not people.



As ELO eG, we create significant added values for our employees. We are proud to work here, and we see ourselves as one big team - from the producers to the distribution logistics. We are always one step ahead of our competitors, and we use logistics processes of the highest quality to ensure fast routes from the field to the marketing agent's warehouse. We strive for the highest possible quality standards, and therefore to continuously ensure the authentic taste of our products.

For this, all our working processes are eco-friendly, and we continuously improve ourselves in the three pillars of sustainability (ecology, economy, social issues).

2. Compliance with current law and internal guidelines

The indispensable foundation of our daily activities is observation of and compliance with all applicable laws and other legislation. Furthermore, we have defined internal guidelines which in some cases go

beyond the legal regulations. All employees of ELO eG are obliged to inform themselves about the legal regulations and internal guidelines applicable to their area of responsibility, and to comply with these in the course of their activities.

From our business partners we also expect full compliance with all relevant national and local laws and regulations, where these affect their business activities.



3. Product safety and quality

In order to maintain our high standard, we place great importance on the safety and quality of our own products. This is why the performance of product controls, residue monitoring, traceability, and support of the producers during certifications are at the forefront of our work.

All employees are expected to report anomalies to their superiors or to the quality management team. From our suppliers we expect compliance with all the requirements demanded by ELO eG and exceeding the legal provisions.

4. Human rights, work requirements and working conditions

ELO eG undertakes to comply with the core labour standards of the International Labour Organization (ILO) at all levels. We also expect this of our business partners. We would particularly like to emphasise the following requirements:

Note: For producers certified to QS FIAS or GRASP, items 4.1 to 4.7 are deemed to be fulfilled.



4.1 Freedom of association

Employees have the right to organise, without external interference, in trade unions. Unions have the right to conduct collective bargaining and to strike.

4.2 Forced labour

All employees have the right to select their work freely. This means that any form of forced labour is forbidden. Forced labour includes all employment relationships in which the performance of work is compelled through force or threats, e.g. slavery, bonded labour, and working relationships where

employees are confined or threatened, or their identity documents are taken away from them.

All employees have the right to terminate the employment relationship, subject to compliance with the notice period.



4.3 Payment

Employees must be paid according to the activity, and must receive at least the legal minimum wage or else the usual industry standard in the respective country.

The employer is obliged to pay workers the same wage for the same work, regardless of gender.

4.4 Working times

The duration of an employee's working day must not exceed eight hours. It may be extended to ten hours only if the average working day has not exceeded eight hours within six calendar months or 24 weeks. The exceptions and special regulations defined in legislation and by the ILO may be availed of, as long as the employee's well-being is not put at risk.

4.5 Discrimination

All employees have the right to be treated equally, regardless of skin colour, gender, age, sexual orientation, religion, social background, political persuasion, ethnic and national origin, family situation or other personal characteristics. This also includes the principle "The same wage for the same work".

4.6 Abuse

The employee has the right for his personal dignity and privacy to be respected and protected. No

form whatsoever of physical abuse, punishment or coercion, or mental, intellectual, sexual or physical harassment is tolerated. Equally, verbal insults, intimidation and the threat of physical force are not tolerated.

4.7 Child labour

Child labour is forbidden at all stages of production. Children must not be employed before the end of compulsory education or under the age of 15 years. Dangerous activities or those impeding human development (“the worst forms of child labour”) are absolutely forbidden for persons under the age of 18.

4.8 Occupational safety

The employer is obliged to ensure the employee’s safety during an activity assigned to the employee. Training sessions in occupational safety are conducted regularly at the place of work. The employee must not be subject to any costs for the necessary protective equipment. The objective is to reduce the number of work-related accidents, sicknesses and deaths to a minimum.

Appropriate numbers of first aid kits, fire extinguishers and trained first-aiders are available in the company. The legal and in-house requirements relating to occupational safety must be complied with by all employees and by the employer.

4.9 Working environment

The employee has a right to work in a safe, hygienic working environment which is not hazardous to health. Reports of deviations must be taken seriously, and must be corrected by the superior responsible.

5. Sustainability

In fulfilment of our responsibility, we at ELO eG commit to acting caringly and in an environmentally friendly way. Our understanding of sustainability is compliance with ecological, social and economic principles, and extensive integration of these into our working day.

We also expect our business partners to act in such a way that subsequent generations can live just as we do in the present. For this, the protection of scarce resources, especially of water, the reduction of greenhouse gases, the conservation of biodiversity, and the respect for human dignity are at the forefront. We very much welcome it when our business partners actively commit to the issue of sustainability.



6. Ethical principles

6.1 Corruption and integrity

Any form whatsoever of embezzlement, bribery, blackmail, corruption or the granting of an unfair financial or other inducement is forbidden. This applies in particular to the relationship with business partners, politicians, journalists and public or state institutions. We expect maximum integrity at all levels.



6.2 Money laundering

Money laundering refers to the channelling of funds obtained illegally, e.g. from drug dealing or blackmail, into the legal financial and economic system. To avoid becoming any part of this organised criminality, ELO eG enters into business relationships exclusively with trading partners who act in accordance with the legal requirements and use legitimate financial resources.

6.3 Fair competition

We face up to our competitors fairly, and we undertake to refrain from any practices which contradict this intent. In particular, we comply with the current anti-trust legislation and we forgo any agreements and other activities which can influence prices and conditions.



6.4 Donations and sponsoring

All donations and sponsoring programmes in which ELO eG participates must be transparent. This applies in particular to the identity of the recipient and the planned use of the donation. The purpose of the donation and sponsoring programmes is to positively impact our reputation and our public perception. It is therefore closely checked whether recipients of donations and sponsoring programmes represent the values of ELO eG.

6.5 Confidentiality and data protection

Employees and business partners who receive confidential information are obliged not to share this with unauthorised third parties.

All information made available to ELO eG is dealt with confidentially, and we use it exclusively for its intended purpose. Current legal requirements for data protection and information security are complied with during collection, storage, processing and transmission of the data.

6.6 Cyber security

In the course of digitisation, the protection of systems, networks and programs plays a major role. Employees are required to use the security systems available, and to check anomalies and report them to IT where necessary. Business partners are required to establish a cyber security system in their company too, so that third parties have no access to sensitive data.

7. Business relationships with suppliers

ELO eG undertakes to communicate this Code of Conduct to its direct suppliers, and to require that they too comply with the principles laid down here. Where necessary, direct suppliers must pass the principles on to their partners in the supply chain. Along the ELO eG value-added chain, deviations from the rules formulated in the Code of Conduct can be reported via the e-mail address compliance@elo-online.de. We reserve the right to request details necessary for processing these reports. Serious breaches may result in termination of the business relationship. Business partners undertake to agree to the Code of Conduct by means of a signature having legal force

8. Compliance with and implementation of the Code of Conduct

All employees of ELO eG are obliged to comply with and implement the Code of Conduct. The management board of ELO eG must monitor compliance.

Breaches of the Code of Conduct must be reported to the Compliance Officer via the established contact options or via the e-mail address compliance@elo-online.de.

We wish to expressly emphasize that all indications of potential breaches are followed up, and that those reporting them do not suffer any type of disadvantage. The severity of the violation affects the way that the person accused is dealt with. For serious breaches, ELO eG undertakes to report the incident to the responsible authority and to terminate the employment relationship.

Company, company seal

Name of employee*, department/position

Place, date, signature of employee

*Please write your name clearly and legibly