

Preamble

Gebrüder Wollenhaupt not only delivers high quality and safe products, but does so in a way that reflects the Company's commitment to conduct its business activities in full compliance with applicable laws and to be guided by integrity and honesty on the basis of high standards of business ethics. We expect similar behaviour from all parties that we deal with, especially from our suppliers. The Gebrüder Wollenhaupt Company Principles prescribe certain values and principles to which Gebrüder Wollenhaupt has committed itself worldwide. This Code specifies the Company Principles by summarizing certain non-negotiable minimum standards (1-7 below) that we ask not only our own employees but also our suppliers, their employees, agents and subcontractors ("the Supplier") to respect and to adhere to when conducting business. It is the Supplier's responsibility to educate its employees, agents and subcontractors accordingly. By accepting the Code, the Supplier undertakes that all existing and future agreements and business relationships with Gebrüder Wollenhaupt will be subject to the provisions contained herein.

Gebrüder Wollenhaupt supports and encourages operating practices, farming practices and agricultural production systems that are sustainable. This is an integral part of Gebrüder Wollenhaupt's sourcing strategy and supplier selection and development. Gebrüder Wollenhaupt expects its Suppliers to continuously strive to improve the efficiency and sustainability of their operations as a basis for long-term cooperation.

It is the responsibility of the recipients of this communication, especially of the managers within our supplier network, to share this Code with their organization and to ensure that it is enforced.

1. Business integrity

Compliance with applicable laws and regulations of sovereign states

The Supplier must comply with all applicable laws and regulations.

Improper advantage

In all its activities, the Supplier must never, directly or through intermediaries, offer or promise any personal or improper advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must the Supplier accept any such advantage in return for any preferential treatment of a third party.

2. Ethical practices

Gifts

Suppliers may not transact business with Gebrüder Wollenhaupt employees or otherwise engage in business relationships that violate anti-bribery laws around the world including bribes, kickbacks or other improper or unlawful payments. It is not permissible to give to or receive gifts beyond a nominal value of US-\$50 a year in the normal course of business. No other advantages may be provided to Gebrüder Wollenhaupt employees.

Invitations

Business meals and invitations must be based on the principle of reciprocity, thus eliminating any suspicion of undue influence.

3. Labour standards

Prison and forced labour

The Supplier must, under no circumstances, use or in any other way benefit from forced or compulsory labour. Likewise, the use of labour under any form of indentured servitude is prohibited, as is the use of physical punishment, confinement, threats of violence or other forms of harassment or abuse as a method of discipline or control. The Supplier shall not utilize factories or production facilities that force work to be performed by unpaid or indentured labourers. Nor shall the Supplier enter into contracts for the manufacture of products with subcontractors that engage in such practices or utilize such facilities. Where a Supplier uses labourers who are in an official prison rehabilitation scheme, such an arrangement is not considered a breach of the Code.

Child labour

The use of child labour by the Supplier is strictly prohibited. Child labour refers to work that is mentally, physically, socially, morally dangerous or harmful for children. The Supplier must ensure compliance with the principles set out in ILO (International Labour Organization) Agreement no. 182 as of 19.11.2000 or following agreements.

Working hours

The Supplier must ensure that its employees work in compliance with all applicable laws and mandatory industry standards pertaining to the number of hours and days worked. In the event of conflict between a statute and a mandatory industry standard, the Supplier must comply with the one requiring the higher standard.

Compensation

The Supplier's employees must be provided with wages and benefits that comply with applicable laws and binding collective agreements, including those pertaining to overtime work and other premium pay arrangements.

Non-discrimination

The Supplier shall implement a policy that conforms to the applicable law prohibiting discrimination in hiring and employment practices on the grounds of race, colour, religion, sex, age, physical ability, national origin, or any other legally prohibited basis.

Freedom of association

Suppliers of Gebrüder Wollenhaupt should have respect for their employees' lawful freedom of association.

Workplace health

The Supplier shall provide employees with safe and healthy working and, where provided, safe housing conditions. As a minimum, potable drinking water, adequate sanitation, fire exits and essential safety equipment, access to emergency medical care, appropriately lit and equipped work stations must be provided. In addition, facilities must be constructed and maintained in accordance with the standards set by applicable codes and ordinances.

4. Product quality and safety

All products and services delivered by the Supplier must meet the quality and safety standards required by applicable law. When conducting business with or on behalf of Gebrüder Wollenhaupt, the Supplier must comply with the Gebrüder Wollenhaupt quality requirements.

5. Environment

Gebrüder Wollenhaupt supports and encourages sustainable and responsible operating and cultivation methods. Practices of agricultural production, the use and handling of energy resources, wastewater as well as solid waste management must meet or exceed applicable standards.

The Supplier must operate with care for the environment as well, and ensure compliance with all applicable laws and regulations in the country where products or services are manufactured or delivered.

6. Supplying farmers

The Supplier shall ensure that supplying farmers or subcontractors become fully aware of the Code, the provisions stated therein and their meaning and implications for their farming methods. The Supplier will use appropriate communication tools and training sessions as necessary.

7. Audit and termination of the supply agreement

Gebrüder Wollenhaupt reserves the right to verify the Supplier's compliance with the Code. In case Gebrüder Wollenhaupt becomes aware of any actions or conditions not in compliance with the Code, Gebrüder Wollenhaupt reserves the right to demand corrective measures. Gebrüder Wollenhaupt reserves the right to terminate an agreement with any Supplier who does not comply with the Code.

Acknowledged:

Date, Company Stamp, Signature

As of April 2016
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