



Code of Conduct

of Reichold Feinkost Group

30. April 2026



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Preamble

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The Reichold Feinkost Group is an independent, family-owned company committed to combining sustainable profitable growth, long-term value creation, and responsible business practices. Our goal is to manage the company responsibly and preserve it for future generations.

The foundation of our actions is personal responsibility, integrity, honesty, loyalty, respect for others and the environment, as well as entrepreneurial responsibility.

Managers and executives bear a particular responsibility to act as role models.

This Code of Conduct defines binding rules, values, and standards of behavior for:

- Corporate bodies and management
- Managers and executives
- All employees (including temporary workers, interns, etc.)

Please refer to the Code of Conduct for Business Partners.

It serves as guidance in day-to-day work, helps prevent misconduct, and safeguards the trust of customers, business partners, employees, authorities, and the public.

02

Our value foundation



02

Our value foundation

Our actions are based on the following core values:

- Integrity, accountability, and transparency
- Team spirit, innovation, and agility
- Respect, fairness, and the protection of human dignity
- Environmental protection, responsible use of resources, and sustainable business practices
- Legal compliance and ethical conduct

These values apply worldwide, regardless of local customs or minimum legal requirements.

Trust, responsibility, and leading by example

03

Trust, responsibility, and leading by example

Responsibility of Management

Managers and executives:

- Lead by example in adhering to the Code of Conduct
- Take responsibility for their own conduct and that of their employees
- Ensure compliance with laws, internal policies, and processes
- Provide training, information, and awareness

Any attempt to influence employees to engage in unethical or unlawful behavior is strictly prohibited.



03

Trust, responsibility, and leading by example

Responsibility of All Employees

- Act honestly, fairly, and responsibly
- Are familiar with the laws and internal regulations relevant to their work
- Avoid conflicts of interest
- Raise issues and concerns at an early stage

No one who reports concerns in good faith shall face any disadvantages.



Human Rights & Fair Working Conditions

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International Standards

We are committed to:

- The Universal Declaration of Human Rights
- The ILO Core Labour Standards
- The OECD Guidelines for Multinational Enterprises
- The UN Guiding Principles on Business and Human Rights



Working Conditions

We ensure:

- Safe and healthy workplaces
- Reasonable working hours, rest periods, and fair compensation
- Prohibition of child labor, forced labor, and exploitation
- Freedom of association and the right to collective bargaining



Equal Treatment and Anti-Discrimination

Discrimination, harassment, or exclusion based on origin, gender, age, disability, religion, political beliefs, or sexual identity will not be tolerated. Performance and potential are the criteria for development and advancement.

Environment, Resource Conservation & Sustainability

Environmental and Climate Protection

- Compliance with applicable environmental laws and regulations
- Responsible use of energy, water, and raw materials, including emissions control
- Reduction of emissions and environmental impact
- Transparent environmental metrics and reporting
- We operate according to recognized standards and implement regular improvement programs

Circular Economy & Innovation

We focus on:

- Compliance with waste management regulations
- Promotion of recyclable packaging
- Use of recycled materials
- Environmentally friendly product formulations
- Sustainable sourcing of raw materials

Legal Compliance & Ethical Business Conduct

Legal Compliance & Ethical Business Conduct



Legal Compliance

All employees comply with national and international laws as well as internal policies. Where local laws are less stringent, our Code of Conduct applies.



Anti-Corruption

Zero tolerance towards:

- Bribery and corruption
- Acceptance or granting of improper advantages
- Undue influence on public officials

Even the appearance of improper advantages must be avoided.



Fair Competition & Antitrust Law

- No price-fixing or market allocation with competitors
- Exercise particular caution in association work and collaborations
- Any suspected violations must be reported immediately

Conflicts of Interest

Conflicts of Interest

Personal interests must not influence business decisions.

- Conflicts of interest must be disclosed
- Transactions with related parties must be reported
- Secondary employment or positions with customers, suppliers, or competitors require management approval



CONFLICT



OF

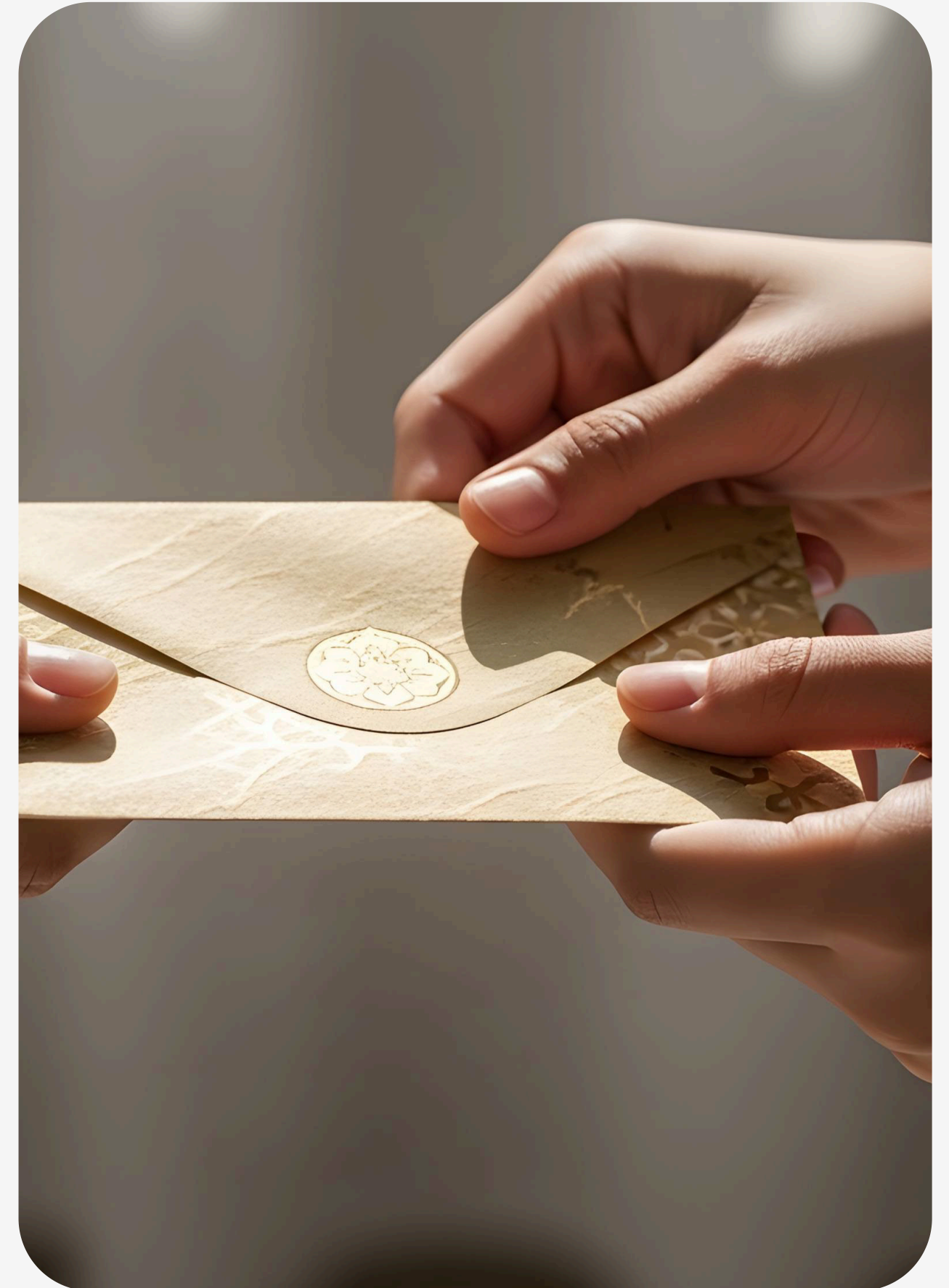


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Gifts, Invitations, Donations & Sponsoring

Gifts, Invitations, Donations & Sponsoring

- Gifts and invitations must be appropriate, transparent, and justified by business reasons
- Gifts exceeding €100 must be reported
- Donations are made only with management approval and must not seek any return favor
- Sponsoring is carried out with management approval



Data Protection & Information Security

Data Protection & Information Security



Data Protection

- Protection of personal data in accordance with the GDPR
- Data processing only for legitimate and transparent purposes
- Respect for all data subject rights

Information Security

- Protection of confidential information, trade secrets, and intellectual property
- Technical and organizational security measures in line with the state of the art
- Confidentiality obligations remain in effect even after termination of employment

Protection of Company Assets & Resources

Protection of Company Assets & Resources

- Company assets are to be used exclusively for business purposes
- Careful use of work equipment and facilities
- Protection of intellectual property and trade secrets is the responsibility of all employees



Health, Safety & Well-Being

Health, Safety & Well-Being

- Prevention of workplace accidents and health hazards
- Regular occupational safety training
- Promotion of physical and mental health
- Close cooperation with the relevant authorities



Communication & Public Relations

Communication & Public Relations

- Communication must be factual, truthful, respectful, and transparent
- External communication is permitted only by authorized persons
- In social media, a clear distinction must be made between personal opinions and official company communication
- The dissemination of false information or statements that could harm the company's reputation is prohibited



Whistleblowing System

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Whistleblowing System

- Violations can be reported internally or through anonymous reporting channels
- Whistleblowers are protected from retaliation
- Reports are reviewed confidentially and fairly



Consequences of Violations

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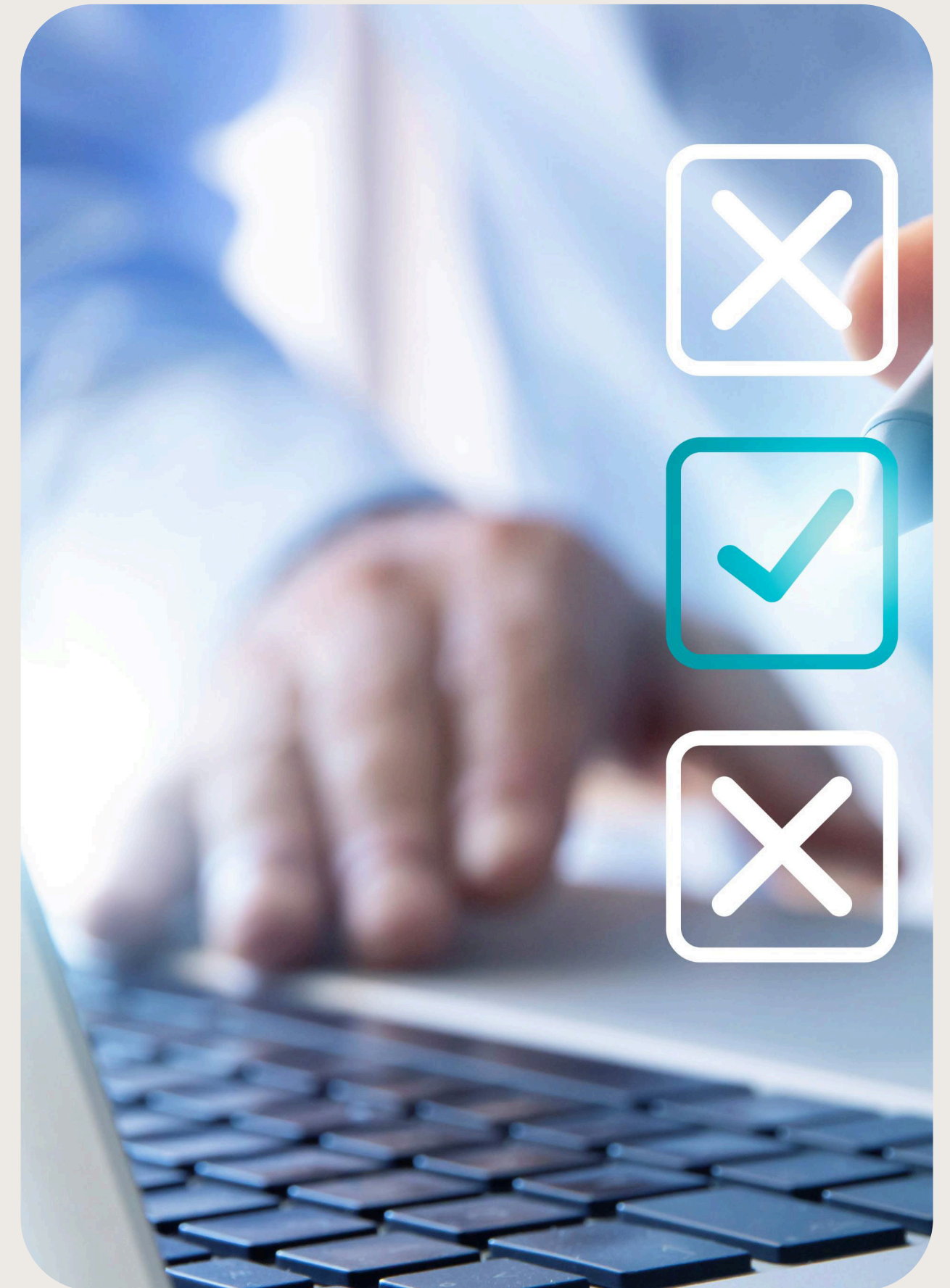
Violations of this Code may result in labor, civil, or criminal consequences – up to and including termination of employment or business relationships. All measures are taken in accordance with the principle of proportionality and applicable labor laws and internal company regulations.



Monitoring, Training & Continuous Improvement

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- Regular review and further development of the Code
- Mandatory training for all employees
- Promotion of an open feedback and continuous improvement culture



Closing Statement

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This Code of Conduct reflects our commitment to responsible corporate governance, sustainable business practices, and respectful collaboration. It serves as a binding standard for our daily actions – within the company, toward business partners, and in society.

