Guideline:
Code of Ethics

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The companies of the Zentis Group in Germany ("Zentis") aspire to create and maintain a corporate culture in which compliance with applicable laws and standards as well as the company's own ethical principles are upheld to the best of their ability. All employees, managers, executives and the management board ("employees") are responsible within the scope of their duties for knowing and complying with the relevant laws, both local and abroad. For these reasons, Zentis has created a Code of Ethics as part of a voluntary commitment, which sets the standards and guidelines for Zentis' corporate actions and is binding for all employees. The Code of Ethics has two main objectives. On the one hand, employees are to be shown general standards of conduct which serve as a guideline for dealing with colleagues, business partners and customers. On the other hand, based on the current BSCI regulations, the Code of Ethics is intended to serve as an integral module for a comprehensive understanding of the corporate culture with regard to integrity and ethical behavior. The Code of Ethics sets out the following principles.

1. Competition and antitrust law

   Zentis is committed to undistorted competition, i.e. competition that is not impaired by unlawful restrictive and/or unfair business practices. Employees must refrain from unacceptable business practices, e.g. with regard to competitors, suppliers, customers and consumers. Zentis respects the principles of fair and free competition in all business relationships. At the same time, Zentis undertakes to comply with anti-corruption regulations and the ban on money laundering.

2. Dealing and cooperating with authorities

   Zentis cooperates with the state authorities in a trusting manner on the basis of the applicable law. Employees are therefore obliged to comply with all lawful orders of state authorities, while at the same time exercising the rights of Zentis.

3. Conflicts of interest

   Employees undertake to behave loyally towards Zentis. Conflicts of interest or even the appearance of conflicts of interest, which may arise, for example, through close family relationships between employees and business partners or customers, or through secondary employment, must be avoided at all costs. In possible cases of a conflict of interest, employees are obliged to coordinate the further course of action with their superiors at an early stage.

   During the period of employment, Zentis must be notified in writing of the nature, location, duration and temporal scope of any secondary employment before it is taken up. Consent may be refused if the employee would violate significant interests of the company or protective laws with the intended secondary employment or if the activity significantly impairs the employee's ability to work.

Furthermore, employees must report possible conflicts of interest due to direct or indirect participation in companies with which Zentis maintains or wishes to establish a business relationship to their respective superiors.

4. Gifts and gratuities

The offering or acceptance of gifts and benefits which could even possibly influence a business decision is generally prohibited. The offering and acceptance of gifts and benefits that do not pose a risk of influencing a business decision is only permitted if this is in accordance with ethically acceptable business practices and does not violate any applicable laws.

5. Environmental protection

For Zentis, as a company in the food industry, it is a fundamental concern to protect the environment and its resources for the present generation and for future generations. For this reason, Zentis and its employees are constantly working - beyond the legal requirements - to reduce the environmental impact of the development, production and marketing of its products in a resource-conserving way. All employees are therefore called upon to act in awareness of this special responsibility for the environment as well as for product quality within the scope of their work for Zentis in all areas.

6. Occupational safety and health

The safety, health and well-being of our employees are of utmost importance to us. We comply with the respective applicable occupational health and safety laws and are committed to further-reaching standards of our own for the continuous improvement of occupational safety in order to create a safe and health-promoting working environment, to preserve the health of employees, to protect third parties and to prevent accidents, injuries and work-related illnesses.

7. Data protection

Zentis respects the rights of employees and external persons (e.g. customers or business partners) with regard to their personal data. Personal data is therefore handled exclusively in accordance with the legal provisions and contractual obligations of Zentis. The employees undertake to comply with the legal and contractual data protection standards with regard to the personal data entrusted to them.

8. Handling of confidential information

The protection of personal data must be ensured. Employees are obliged to treat information about the company, customers, business partners and colleagues as well as company and business secrets of the company as strictly confidential. This applies both during and after termination of the contractual relationship. Confidential internal information may not be disclosed to third parties. For these reasons, employees must store confidential documents in such a way that unauthorised inspection by third parties is excluded.

The employees are instructed to ensure that visitors to Zentis do not gain access to confidential documents. Visitors are generally not allowed to stay on the company premises without an internal escort. Furthermore, conversations with confidential content concerning the company must not be held in public places, e.g. in restaurants, public transport, corridors, etc., where the conversation could possibly be overheard by third parties, orally or by telephone.

Furthermore, personal data of employees, customers or other third parties may only be collected, processed and/or transmitted by employees if there is a legal basis under data protection law or with the consent of the persons concerned.

These obligations also apply without restriction when dealing with the internet, private and professional networks as well as social media, e.g. Facebook, Twitter, LinkedIn, various blogs, etc. The posting of confidential information is strictly prohibited unless Zentis has given its explicit consent.

The principles of proper bookkeeping and accounting are complied with.

9. IT security/use of e-mail and internet

For Zentis it is essential to guarantee the functionality and system security of the IT systems used in the company. For these reasons, the installation and maintenance of hardware and software is carried out exclusively by employees of the IT / Digitalisation department or by third parties commissioned by IT. Access to the systems of the Zentis Group, the associated authorisations and all usage regulations are of high security relevance for Zentis and must be observed by all employees without restriction.

10. Diversity, Inclusion & Equal Opportunities

The conduct of employees at Zentis is marked by a high sense of responsibility and stays within the framework of legal regulations. Respectful and cooperative interaction is important, as only this guarantees a trusting working environment, which is ultimately a prerequisite for proper decisions.

The diversity expressed in the origin, culture, language and ideas of the employees offers Zentis business and personal opportunities. Zentis values this diversity and is aware that it also requires a high degree of care in dealing with each other in order to avoid misunderstandings and conflicts.

Any behaviour that disregards the human dignity of another person, discriminates against another person or harasses another person is prohibited. Zentis therefore also rejects any inadmissible discrimination as well as any manifestation of mobbing and sexual harassment. Differential treatment of employees (m/f/d), e.g. for reasons of "race" or because of ethnic origin, descent, of gender, religion or belief, disability, age or sexual identity may not be made.

(Note: Zentis also rejects the term "race", as it suggests that there is such a thing as human "races", which is, however, scientifically disproven. However, as long as the term is used in the Basic Law, it is also used here for clarification). Zentis resolutely opposes xenophobia and extremism in any form and is fully committed to the initiative "Together for Tolerance" it has launched.

Zentis is committed to ensuring equal opportunities for all employees.

11. Political activities

Zentis recognises the rights to freedom of assembly and the formation of interest groups. Party political activity in the company, in particular the organisation of political events on the company premises, is expressly prohibited. Employees are not permitted to put up posters on the company premises or to distribute leaflets or other printed matter without the express consent of Zentis. This does not affect the handling of matters of collective bargaining policy, social policy, environmental policy and economic policy which directly affect the company or its employees.

Employees are of course free to engage in private political activities if they do not do so as employees or representatives of Zentis.

12. Alcohol and drugs

Alcohol and drug abuse pose a serious threat to the safety, health and productivity of the company and its employees. The health and well-being of employees and high safety standards are a top priority. This includes taking responsibility for risky alcohol or drug use and the associated dangers in the workplace.

Therefore, the possession, consumption and procurement of drugs on company premises is strictly prohibited. Employees are also prohibited from performing their work for Zentis while under the influence of drugs or alcohol. Employees under the influence of alcohol or other intoxicants must leave the company premises.

13. Prohibition of child labour

Child labour and any exploitation of children and young people are not tolerated by Zentis. The legal regulations according to the Youth Employment Protection Act apply to recruitment and employment.

14. Prohibition of forced labour

In accordance with legal regulations, there is neither forced labour nor disciplinary measures at Zentis. Employment is only on a voluntary basis. Employees have the right to leave their workplace at the end of the working day and are free to terminate their employment in compliance with the notice period (collective agreement, BGB). The use of corporal punishment as well as psychological or physical coercion and verbal insults is prohibited.

15. Remuneration

Remuneration at Zentis is in accordance with the collective wage agreement for the fruit and vegetable processing industry or in accordance with individual contractual agreements, taking into account all legal regulations. No unlawful deductions or reductions in remuneration are made as punitive measures. Zentis ensures that employees are informed clearly, in detail and regularly about the composition of their pay. Likewise, it is ensured that remuneration is paid in accordance with the applicable laws.

16. Working time

Zentis ensures that the regulations on working hours comply with the legal requirements (e.g. Working Hours Act, Federal Holiday Act). There are regulations regarding overtime and extra hours, which are also fixed in the collective agreement of the fruit and vegetable processing industry or in collective agreements.

17. Violations and sanctions

Any indications of violations of this Code of Ethics can be reported at any time within the framework of our internal control system to the direct superiors, the Compliance Officer or anonymously via the Compliance Hotline.

Violations of these guidelines or legal regulations that are also punishable by law must be reported.

Zentis guarantees a prompt clarification of the facts.

In the event of possible violations that are punishable by law or misdemeanours, Zentis will involve the relevant authorities. Notwithstanding this, employees who violate the Code of Ethics will be held responsible with civil or labour law measures, depending on the severity and extent of the violation.

18. Prohibition of discrimination

Employees who report indications of violations to the responsible persons will not be disadvantaged in any way, in particular they will not be subject to any disciplinary action. The strictest confidentiality shall be maintained.

19. Responsible entrepreneurial action

In order to avoid and remedy negative effects on labour, human rights, the environment, bribery, consumers and corporate governance in connection with our business activities, supply chains and other business relationships, we are guided in our actions by the OECD Guidelines for Multinational Enterprises.

20. Implementation of and compliance with the Code of Ethics

Each individual employee contributes to ensuring that the Code of Ethics is always and correctly implemented in the company. If there is any uncertainty about the content of the Code of Ethics or if there is any question as to whether specific conduct complies with the requirements of the Code of Ethics, each employee is requested to approach his or her supervisor and other employees responsible for this in confidence.

The management