



Hochwald Foods



PREAMBLE |

The Hochwald Group is structured as a cooperative, and thus differs from other companies on the market. As members of Hochwald Milch eG, our milk suppliers have always been an active part of our company. We work together to achieve long-term success: economically through appropriate value creation, ecologically by protecting the environment and conserving resources, and socially through successful cooperation.

We place great importance on values, such as integrity, reliability and credibility – not only within our company, but also when dealing with suppliers, customers and multipliers.

The Hochwald Code of Conduct provides a clear summary of the principles of our business activities, and thus provides us with a binding framework for taking responsibility: legally and in our dealings with people, nature and values. However, no set of rules can clarify all individual cases. The Code of Conduct sets out the framework within which we operate and act – as employees of the Hochwald Group and as members of Hochwald Milch eG.

This Code of Conduct, common sense and answering questions, such as outlined below, help us to reflect on our actions: „Is it proper what I am doing? Do I have doubts?“ Another question could be: „Am I prepared to take responsibility for this decision?“

It is our common goal to provide our customers with high-quality and attractive dairy products for a great range of different consumers, so as to provide our members with secure and satisfactory returns: today and in the future.

1 | Hochwald, the market and legal regulations

In our actions and decisions, we comply with the applicable laws, the standards to which we are committed and our own guidelines, as this ensures the future of Hochwald. We do this out of conviction – these standards guarantee an orderly and safe coexistence for all of us. While managers serve as role models, all employees have a duty to act accordingly.

1.1 Fair competition and antitrust law

For our market presence, we focus on our products, services and skills. We treat our competitors and customers with respect and promote the things we can do: Milk and cheese products of the highest Hochwald quality, based on the needs of our customers.

We do not tolerate any influence on competition by means of bribery, fraud, industrial espionage or other unfair means, whether by third parties or employees.

We operate in open markets. With our actions, we allow our customers to make their purchase decisions free from any compulsion. Any agreements regarding prices, price components or conditions, time and scope are strictly prohibited. Any conduct that restricts free competition with and against each other unfairly is rejected.

Additional information regarding antitrust law is available in the internal guidelines on antitrust law, which are binding for all employees.

1.2 Commitment and advocacy

We represent the interests of our customers, our members, our milk suppliers and our employees in public. We do this in a transparent and open manner, both on national and international level, including in the political sphere.

1.3 Prevention of corruption

Hochwald stands for quality and value for money. We therefore do not engage in any form of bribery, nor grant any benefits that may affect our business. Of course, this also applies to gifts and benefits that are offered to us.

The company's internal guidelines on corruption prevention provide a precise framework for employees.

2 | Hochwald takes responsibility for the future

We are prepared to take responsibility for our employees, for our members, for the quality of our products, for the environment, and for the social inclusion of people. For generations, our members and suppliers have been doing exactly that on their farms. We, as the Hochwald Group, ensure this by intensive dialogue, numerous audits and certifications and sustainable corporate development.

2.1 Quality and safety

Our lasting economic success is based on the high, consistent quality of our products. Our cooperative milk suppliers, who have undertaken to be audited in accordance with the recognised "QM-Milch" standard, have laid the groundwork for this. We build on that foundation, and ensure the safety and quality of all our products through the continuous improvement of our production processes.

We are constantly striving to further improve ourselves, our processes and our products. We focus on the needs of our customers, and are driven to develop new products. This is why the religious and ethical characteristics of our customers are also taken into account, and customer-oriented standards, such as those relating to Halal and Kosher are fulfilled, which we have specifically certified.

2.2 Leadership with responsibility

Every employee has a responsibility for the success of Hochwald. Managers serve as role models. It is their task to support the employees in their development, because committed, qualified and responsible team members help us to achieve our goals.

2.3 Human rights

We recognise the United Nations Universal Declaration of Human Rights. We do not tolerate any deliberate use of forced and compulsory labour, including debt bondage or involuntary prison labour and human trafficking or child labour.

2.4 Respect and equal opportunities

Men and women of all ages and backgrounds work in our company. Our workforce includes people of different religious and cultural background, as well as people with disabilities or a different sexual orientation.

We respect the right of our employees to express their opinions freely within the limits of the legal restrictions of a democratic society.

We value and protect this diversity. Fairness, tolerance and equal opportunities make us successful.

2.5 Appreciation

Our employees are guarantors of our success. We therefore ensure safe workplaces and protect the health of our employees - in accordance, among other things, with the principles of the International Labour Organisation (ILO). Comprehensive occupational safety and health management, which exceeds the legal requirements, contributes to the survival of Hochwald. Together we develop preventive strategies and raise awareness for this topic.

At the same time, we are committed to providing training and further education. Young people and experienced team members benefit equally from this.

2.6 Protection of the environment

Our entire work is based on a natural product – milk. We therefore actively promote the protection of our environment and resources, and support our members in their efforts.

Our processes and plants are continuously optimised. The aim is to improve energy efficiency and minimise environmental impact. We provide the necessary resources and information.

We regularly test our environmental and energy management system in accordance with international standards that go beyond the legal requirements.

2.7 Protection of data & IT

We collect personal data of our employees, members, suppliers and customers as part of our business activities. This data is only collected to the extent permitted by law and treated as confidential. If required, we obtain consent from the parties concerned.

Please contact the data protection officer in case of doubt as to whether we are allowed to collect, store and process data.

The employees are fully aware of the importance of efficient IT. This is why our employees support all measures aimed at IT security and thus contribute to the success of Hochwald.

We support the ongoing digitalisation of processes constructively, and promote security through responsible behaviour.

2.8 Active participation

The right to assemble, organise and join trade unions is a great asset that we recognise and ensure for our employees.

The open and trustful cooperation with the works councils and the central works council makes us stronger as a company.

2.9 Social responsibility

As a company, we are rooted in local regions, and we are aware of our responsibility to society. For this reason, we promote transparent associations and institutions, mostly regionally for local people.

3 | Hochwald employees: loyal and reliable

Our employees are a central element of our success. They are committed to their workplace and protect the company's assets. In addition to the facilities, this also includes the information within the company. Company and business secrets are treated as confidential by all employees regardless of the hierarchical level. Of course, this also applies to confidential information regarding our business partners.

3.1 Avoiding conflicts of interest

We work independently and are loyal to our company. If there is a conflict of interest – for example, if personal interests or family members are involved in a particular event – we will disclose it and look for solutions together.

We examine on a case-by-case basis whether any additional activities, public offices and shareholdings may restrict loyalty towards Hochwald.

Concluding remarks:

The Code of Conduct provides a framework for our conduct as employees of Hochwald. If questions arise in the course of our daily work, or if there are indications of a breach of these rules, we contact an executive or employee representative. Additionally, a neutral contact point will be available in the future.

Our approach includes ensuring that every employee can - and should - contribute to the development of our company. This includes open feedback without fear of negative effects. All information, questions and complaints are treated confidentially by the contact persons upon request.

The Code of Conduct is binding for all employees of the Hochwald Group and all members of Hochwald Milch eG. Any breaches will be investigated and evaluated regardless of the position of the person. The appropriate consequences will then be taken.

