



**FRESH  
FACTORY**  
MADE IN HAMBURCH

# CODE OF CONDUCT



AS OF FEBRUARY 2023

# Dear colleagues,

The corporate philosophy of Fresh Factory and the management approach which it guides are based on integrity, honesty and fairness. Compliance with relevant laws and regulations as well as ethical behaviour are essential for our everyday business. This is particularly important when it comes to our corporate social responsibility for sustainable economic management. In addition to the legal regulations, our internal guidelines and core ethical values are also binding for us.

This Code of Conduct sets out these important principles in one document for the first time and serves as our guide to ethical and responsible business conduct. It cannot cover all possible situations that may occur in our daily work life but is designed to describe the standard against which all activities are to be measured. In cases of doubt, employees must turn to colleagues and supervisors for help in order to „do the right thing“, even in unclear situations.

However, all these values can only be brought to life by the staff which acts on the company's behalf. The Code of Conduct therefore applies without exception to all employees of Fresh Factory, regardless of their position. It is mandatory for each of us, executives, managers and each member of staff, and expands the terms of our employment contracts with these important corporate principles. Of course, the contractual terms and conditions remain valid.

The managers in our company bear a special responsibility. They are expected to set an example by being conscious of their function as role models and by putting the shared values into practice. Furthermore, they are responsible for the employees entrusted to them and must earn their recognition through exemplary behaviour, strong performance, openness, fairness and social competence.

Each Fresh Factory employee is responsible for his or her own actions and represents the company on a daily basis. The misconduct of one individual can cause enormous damage to us all. We therefore ask you, dear colleagues, to carefully read this Code of Conduct. Please familiarise yourself with our basic values and use them as guidelines for your actions.



Andreas Ballon



Klaus Klische



Marlon Raczak

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## 1 Compliance with the Law

principle of responsible business conduct. We must all respect and adhere to applicable laws and regulations. Violations of the law could cause serious damage to the company and lead to severe consequences for the individuals involved and must be avoided under any circumstances.

## 2 Equal Opportunity and Anti-Discrimination

At Fresh Factory we are proud to employ around 70 people from over 15 nations. We recognise, embrace and celebrate the cultural diversity of our workforce and appreciate their different personalities and ideas. Diversity for us is a key driver of innovation which unlocks new perspectives and enables growth. We strive to create an open and welcoming work environment in which we treat each other fairly, with dignity and respect. This involves promoting inclusion, tolerance and equality of opportunity.

We do not tolerate discrimination, harassment or bullying of any kind. This applies regardless of nationality, gender, age, religion, disability, pregnancy or sexual orientation. In addition, all decisions in all areas of the company must be made regardless of cultural, social and ethnic origin as well as political or any other opinion.

We are all expected to live by these principles as we carry out our daily work. We treat each other, our customers, our suppliers and other stakeholders with integrity, humility and kindness and aim to build long-lasting partnerships.

## 3 Occupational Safety and Health

The health and safety of our employees, customers, suppliers and visitors is very important to us. We must therefore comply with all applicable safety standards whether inside or outside the company. Each employee is expected to be familiar with the relevant rules and regulations on workplace safety and must immediately report any possible issues and hazards to their respective superiors.

## 4 Product Safety and Quality

Freshly cut & delivered nationwide within 24 hours – that's our everyday business and a goal we set for ourselves. Our products are produced to the highest levels of food safety and quality, which is reflected in our success. However, to uphold these high standards, the commitment of every single employee is required. For this reason, all employees must observe the relevant quality and food safety regulations. This is the only way we can meet our responsibility towards our customers and ensure healthy, nutritious and safe food.

## 5 Fair Competition and Antitrust Laws

Fresh Factory is committed to the principle of free and fair competition and complies with all antitrust and competition laws. We firmly believe in our products and have great confidence in our own strengths. Any kind of anti-competitive business behaviour is strictly prohibited. This includes discussions and agreements with competitors regarding sensitive topics such as pricing, price changes, margins, discounts as well as terms and conditions. Violations will not be tolerated and will result in appropriate punishment of the individuals involved.

## 6 Anti-Corruption and Anti-Bribery

We reject all forms of unethical business conduct such as bribery or corruption. Giving, offering or promising as well as taking, demanding or accepting improper advantages to and from third parties such as employees of business partners or public officials for the purpose of obtaining or retaining orders or other benefits is prohibited. It is equally prohibited to demand or accept personal advantages in connection with business activities. Employees must inform their superiors immediately if they are confronted with corrupt practices.

## 7 Data Privacy and Data Security

We are obliged to treat confidential information with the highest discretion. The disclosure of confidential information to unauthorised third parties is prohibited. We also adhere to high standards when collecting, storing, processing or transferring the personal data of our employees, suppliers and customers. They are only used for legitimate and transparent business purposes and in accordance with applicable laws.

## 8 Environmental Protection and Social Responsibility

Responsible business conduct is embedded in our corporate culture and daily work. We are committed to preventing harm to people and the environment. In view of our social responsibility and obligation towards current and future generations, we pursue a holistic approach to sustainability including environmental, economic and social development goals.

As a fruit salad producer, all the raw materials we process rely in some way on nature. Our company's activities depend on a healthy environment. That is why environmental protection is very dear to our hearts. Each employee is expected to preserve nature and protect the environment by using resources sparingly and efficiently, avoiding waste, and recycling.

## 9 Human Rights

We are committed to respecting, protecting and observing internationally recognised human rights and particularly support the following global human rights standards:

- » The Universal Declaration of Human Rights
- » The Ten Principles of the UN Global Compact
- » The OECD Guidelines for Multi-national Enterprises, and
- » The Core Labour Standards of the International Labour Organisation (ILO).

All of these human rights standards can be found on the Internet. We condemn any form of child labour and forced labour including modern slavery and human trafficking and reject any other form of human rights violations. Our business partners are expected to share these values and comply with relevant laws.

## 10 Reporting Violations and Concerns

All employees are required to adhere to the rules and principles laid down in this Code of Conduct. Violations must be reported to superiors or the head of the Human Resources Department. In particularly sensitive cases or if superiors or managers themselves are involved in violations, the executive board should be contacted in confidence. All information and reports will be treated confidentially. Retaliation against employees who report in good faith is prohibited, however, the rights of the accused persons are also protected.

The provisions of the Code of Conduct are binding on all Fresh Factory employees. Violations will lead to disciplinary action up to and including dismissal, depending on the circumstances and the severity of the offence. In addition, violations may be punished by the relevant authorities which may result in fines or even imprisonment. Finally, in individual cases, damage caused by violations could result in the assertion of claims for damages.