



Für gute Lebensmittel

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Valid from: 20.08.2019

## Code of Conduct | Wernsing Feinkost GmbH

In the following sections, the term „employee“ is used in a non-gender specific way (m/f/x).

### 1. Introduction

The corporate philosophy of Wernsing Feinkost GmbH is based on integrity, sincerity, fairness and compliance with applicable laws and guidelines, and their corporate management is guided by this philosophy. These values and standards can only be brought to life by the employees working for our company. Therefore, this Code of Conduct applies to all employees.

This Code of Conduct cannot cover all possible situations that could arise in everyday business - it describes the gauge by which all activities should be measured. In case of doubt, all employees must turn to their colleagues for help in order to do the right thing even in unclear situations. In this respect, all employees, including the management, commit to constructive cooperation, in order to avert damage to the company - especially its employees, clients and suppliers - and to live up to their joint responsibility for sustainable management.

### 2. Compliance with legal provisions and internal guidelines

It is indispensable that relevant statutory provisions be observed and complied with during our daily course of business.

However, in addition to these indispensable statutory provisions, our internal guidelines and regulations are binding for us, especially the Code of Conduct written down here. These company-specific internal guidelines and regulations can in some cases exceed legal requirements.

All employees are instructed to know and observe the statutory provisions, as well as the internal guidelines and regulations, which are relevant to their activity.

### 3. Basic behaviour

Showing respect and esteem toward everyone without exception is one of our most important values. In particular, we must always treat our colleagues and business partners with fairness and tolerance. Any form of discrimination or personal attacks toward individual people by members of our company violate our corporate principles and will not be tolerated.

We value and are committed to reliability and sincerity. Each employee bears the responsibility for own behaviours, and represents our company toward those outside our firm by actions and behaviour. As supervisors, our managers bear special responsibility for setting examples. They are instructed to live by our Code of Conduct and guide their employees in acting correctly.

### 4. Quality assurance

We produce and distribute high-quality comestibles. For us, this is both a claim and a duty. We expect our employees who are entrusted with developing, manufacturing, processing, packing and storing our products to know and observe the relevant standards for product quality and food safety. Only in this way can we live up to our responsibility toward our clients and consumers.

### 5. Fair competition

In purchasing and in sales, we remain in permanent competition with other companies. We meet this competition head on, with fair means and according to statutory provisions. We believe that we can hold our own in this competition based on our strengths. In this respect, the following behaviours in particular will not be allowed: Exchanging information about prices, margins, costs and calculations with competitors.

Es gelten die allgemeinen Geschäftsbedingungen, abzurufen unter [www.wernsing.de/agb](http://www.wernsing.de/agb)

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Für gute Lebensmittel

## 6. Corruption and money laundering

Bribery by offering or guaranteeing advantages to employees of business partners or public officials for the purpose of winning contracts or other advantages is not an option for us. It is just as prohibited for our employees to use their positions to demand or accept personal advantages. Employees must inform their supervisors immediately if they are confronted with demands for guaranteeing advantages, or if such advantages are offered to them by business partners or third parties. You may absolutely accept or grant occasional or courtesy gifts that have only symbolic value. You may also be carrying out or participate in business hospitality (within normal and reasonable limits). But you must check with your supervisor in advance before offering or accepting gifts which exceed EUR 75 in value.

When selecting suppliers and service providers, we ask that they also measure up to our values and comply with applicable laws. We will enter into no transactions which entail money laundering, circumventing international trade restrictions, or evading taxes or fiscal duties.

All employees in the areas of purchasing and sales, as well as those who remain in regular contact with business partners and competitors, are instructed to know and observe the relevant provisions.

## 7. Non-discrimination and equal treatment

We can only be successful if we treat all people with respect and fairness. This goes for those inside and outside our company. We respect the personal dignity, private sphere and personal rights of our colleagues and business partners. This allows no place for discrimination, so we reject any form of disadvantages, especially regarding:

- a. nationality, skin colour or ethnic origin,
- b. gender, sexual identity or sexual orientation,
- c. age, handicaps or appearance,
- d. religion, culture or world view.

The above principles for anti-discrimination apply not only to the selection and remuneration of our employees, but in daily dealings with employees, colleagues and third parties.

## 8. Safety and health protection in the workplace

We place a high value on the health and safety of our employees, clients and consumers, as well as contractors and visitors. Therefore, all security guidelines in the workplace, whether inside or outside the company, must be carefully observed. All employees are instructed to know the relevant guidelines for safety in the workplace, and to report any deficiencies and dangerous situations to their respective supervisors immediately. Drugs and alcohol in the workplace are strictly taboo.

We expect our managers to assume responsibility for the employees entrusted to them. Every manager must strive to gain the respect of employees by model behaviour, service, openness, fairness and social competence. Managers are also responsible for supporting their employees in their development and for offering them suitable training.

## 9. Confidentiality and data protection

During their employment, our employees will continually come across confidential information. This may not be passed on to unauthorised third parties, to colleagues that are not entrusted with the procedure in question, or within the private environment (family and friends). Such information particularly includes contractual agreements with our business partners, sensitive company information and business secrets such as calculations and the current business situation, business plans and strategies, product development, formulas and production procedures, as well as sales plans and pricing.

Employees who have access to personal data of other employees, our business partners, or to systems in which these are used, must observe all applicable guidelines and laws regarding the collection, use and publication

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of personal data. Personal data may only be used for legitimate business purposes, and may only be transmitted when secured through encryptions.

Personal data may only be stored and processed on in-house data processing devices (servers, PCs, notebooks, smartphones, storage media, etc.). Transfer to private data-processing devices is forbidden. Stored data may not be relocated to external cloud services which do not satisfy German data protection regulations. Personal data may only be collected or processed if this is legally permissible or the party involved has given **their** consent.

## 10. Sustainability and social responsibility

As part of our social responsibility for people and the environment, we commit to sustainability-oriented business practices. In accordance with our concept of sustainability, **economic, social and ecological** aspects must be holistically considered and brought into alignment in our daily work routine.

We therefore strive toward responsible and long-term commerce with our consumers, our business partners, and our employees. As a manufacturer of high-quality foodstuffs, the protection of nature and the environment is especially important to us, regarding both the current and future generations. All employees are instructed to protect nature and the environment by using resources frugally and efficiently, avoiding waste, and recycling.

## 11. Human rights

We respect and support internationally recognised human rights, and refuse forced labour as well as child labour in any form. Complying with the standards of the conventions of the International Labour Organisation (ILO) and the Business Social Compliance Initiative (BSCI) are for us a matter of course.

## 12. Dealing with violations of the Code of Conduct

All our employees are challenged to observe the rules of behaviour laid down in this Code of Conduct. If anyone has determined a violation of this Code of Conduct, he is obligated to report it to the supervisor or the Director of the Human Resources Department, Mr. Lars employees can always make contact, in complete confidence, with the management, or the person of trust, our employee Ludger Kleyer or with lawyer and notary Dr. Christian Ruhe (Tel.: 04441-92720). We promise that all comments and complaints will be treated with discretion.

The management forbids retaliatory measures against employees who make reports in good faith, but also protects the rights of the accused person. The rules of behaviour laid down here are binding for all employees. As your employer, the firm will punish all violations of these rules with appropriate disciplinary measures—including

termination—depending on the type and severity of the offence. Violations can also be punished by competent authority, which can lead to financial penalties or imprisonment. Finally, in individual cases, damages caused by violations may lead to assertion of claims for damage compensation.

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