



**CODE OF CONDUCT**

## PREAMBLE

Dear employees,

What drives us as Finzelberg is our mission to contribute to human health with high-quality plant extracts, thereby strengthening our customers' position in the market.

We believe that holistic, sustainable thinking and acting are part of our identity and corporate responsibility, and the prerequisite for value-creating growth. As a leading international group of companies focused on botanical products and services, we have a long-term vision, and consistently pursue our goals. We treat nature and its resources responsibly, and we have a respectful, fair, and reliable way of working internally and with our business partners. In a global environment, we work together with diverse cultural, professional, and personal backgrounds. We do value such

diversity. And we believe that the quality and safety of our products are essential to our success.

Our deep roots in the natural world of plants symbolize growth, strength, and stability. Our roots and values as part of nature network, a fourth-generation family business, also stand for this. Trust, transparency, honesty and mutual appreciation are integral parts of our corporate culture.

This Code of Conduct translates our values into guidelines: It reflects the non-negotiable requirements for social, ecological, and ethical obligations as well as our quality and safety standards. It helps us to make responsible decisions, even in challenging circumstances. It also provides clear guidance for em-

ployees who wish to make suggestions, ask questions, or have a concern.

It is based on the United Nations Sustainable Development Goals, the principles of the UN Global Compact, and international conventions on human rights and environmental protection.

As employees of Finzelberg, we expect you to act in accordance with our Code of Conduct. A breach of its principles and rules can have legal, financial and other disciplinary implications.

We sincerely thank you for your commitment and support. All of us contribute to a positive climate of cooperation and foster the success of our group of companies also through our personal conduct.



Michael Braig  
CEO  
Finzelberg GmbH & Co. KG

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# 1. Social, environmental and ethical requirements



# 1. SOCIAL, ENVIRONMENTAL AND ETHICAL REQUIREMENTS

We expect you to always comply with our social and environmental responsibility requirements and ethical business conduct. These include the laws and official regulations relevant to your work environment, as well as internal instructions and guidelines.

## 1.1 Social responsibility

Our employees are the most valuable asset of our company. This must be promoted and protected. Finzelberg is committed to ensuring high qualification standards for its employees in order to enable a high level of performance and high-quality work.

Taking on social responsibility and adhering to fundamental social rights and principles are indispensable components of our value-oriented corporate

management. We offer all employees a safe and healthy working environment. Transparency in the supply chain forms the basis for the sustainable procurement of our raw materials. We ensure that human rights are respected along our supply chain and that no exploitative child labour takes place.

### 1.1.1 Humane treatment

Every employee has the right to life, freedom and safety. We do not tolerate forced labour. Work is performed voluntarily and without the threat of punishment. Employees can terminate their work or employment relationship at any time with reasonable notice. There is no unacceptable treatment of workers or colleagues, such as psychological hardship, sexual and personal harassment or humiliation.

### 1.1.2 Equality of opportunity and prohibition of discrimination

Successful work is accompanied by an appreciative working environment as well as constructive and open communication. We take care to grant every employee the right to equal opportunities and equal treatment, regardless of

gender, national and ethnic origin, social origin, skin colour, disability, health status, political conviction, world view, religion, age, pregnancy or sexual orientation. The personal dignity, privacy and personal rights of each and every individual must be respected. We do not tolerate any form of discrimination, harassment, bullying or intimidation.





### **1.1.3 Prohibition of child labour and protection of young workers**

Our company does not employ persons who have not reached at least the local legal minimum age but are at least 15 years old. Furthermore, young workers under the age of 18 are not allowed to perform work that may be harmful to the health, safety or morals of children.

### **1.1.4 Occupational safety and health protection**

Relevant occupational, health and fire protection standards are adhered to.

We ensure a safe and hygienic work environment and take appropriate measures to ensure health and safety in the workplace.

Every employee must report hazardous areas immediately and should also pay attention to the safety of his or her colleagues. We regularly conduct safety training, monitor and evaluate workplace safety, and perform emergency drills to increase the safety awareness of our employees.

### **1.1.5 Working hours, appropriate remuneration and employment contract**

We comply with all labour law and collective bargaining regulations. In doing so, we ensure that our employees work no longer than the permitted working hours, comply with the specified work breaks, and take a regular, paid holiday. Overtime shall be remunerated at least in accordance with the respective statutory or collective agreement regulations, and its ordering must remain an exception.

Minimum wages specified by the state or collective agreement may not be undercut. All benefits required by law or collective agreements are granted. If applicable, we note that in countries without a collective or statutory wage framework, the wages are sufficient for regular full-time work to meet the basic needs of our employees. Wages are not withheld and are paid regularly in a form suitable for the employee. Wage deductions are only permitted within the legal or collective agreement framework. The employees are regularly informed about the composition of their remuneration.

Legally binding employment contracts are concluded with employees. Insofar as national regulations and laws require it, these are concluded in writing.

### **1.1.6 Freedom of association and trade unions**

We maintain open and constructive communication with our employees and works councils and respect freedom of association and the right to form or join a workers' rights organisation, to bargain collectively and to strike. Employees may not be discriminated against on the basis of founding, joining or being a member of such an organisation. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative options for independent and free association are permitted.







## 1.2 Environmental responsibility

We consider the protection of our environment and the protection of our natural resources to be a central corporate goal. Our group of companies, the nature network, bases its business purpose on the use of plants. Protecting this natural resource is essential to the long-term success of our company.

As an employee, you share responsibility for protecting our environment and preventing pollution of our environment as part of your work. Since environmental protection is essentially driven by ideas for improvement and innovation, it is important to us to allow an open exchange and to take up new ideas positively and check their implementation.

In general, we act exclusively in accordance with all applicable statutory

and international environmental protection requirements.

### 1.2.1 Climate protection

We are pursuing an ambitious climate protection goal to secure long-term natural resources and to ensure humane conditions in our value chain. We are convinced that climate change threatens the long-term existence of our company, and also that of our suppliers and customers, and therefore we must act.

The nature network has set itself the goal of operating in a climate-neutral manner by 2030 at the latest and of achieving the net zero target of the international Science Based Targets (SBTi) by 2040. Our goal includes strict CO<sub>2</sub> reduction at our sites and in our supply chains – from cultivation and wild collection of plant raw materials to transport and production. We offset CO<sub>2</sub>

emissions that cannot be reasonably or justifiably reduced with recognised carbon sequestration or CO<sub>2</sub> avoidance projects.

The protection of our climate is only possible together in the form of the commitment of all employees and also the commitment of our suppliers. It is important to us to continue to promote this commitment. As an employee, we expect you to be involved in your work and opportunities and contribute to our climate protection goal.

### 1.2.2 Handling resources

We expect you to use natural resources carefully in your work. In particular, this applies to the sustainable and efficient use of energy, water and auxiliary and operating materials, especially chemicals.



### **1.2.3 Operational environmental protection and the circular economy**

We apply appropriate environmental standards and methods in accordance with relevant national and international environmental laws and standards. Laws, company permits and limit value specifications must be complied with. We expect that you as an employee will work towards increasing efficiency and improving the handling of waste, hazardous substances and water-polluting substances, fresh water and wastewater, energy and pollution control within your working environment. In the spirit of the circular economy, substances should, if possible, be used in such a way that they do not have to be disposed of as waste, but can be reused or recycled. The protection of soil and water from environmentally hazardous substances must be ensured. The company ensures appropriate emergency management and regular training. This means

that environmental damage can be reacted to quickly. In the event of an emergency, employees will do their best to limit the extent of damage.

Our production and work facilities must generally be constructed and maintained in such a way that legal energy requirements and fire protection requirements in the event of fires and emergencies are met. Structural and technical plant requirements are implemented in accordance with the applicable standards.

### **1.2.4 Protecting biodiversity and habitats in our supply chains**

We are responsible for our international supply chains. Our corporate purpose is based on the processing of plants. Their long-term protection in cultivation and environmentally friendly processing is an essential part of our corporate philosophy. Preserving biodiversity and protecting habi-

tats in our supply chains is fundamental to our procurement processes.

The cultivation, wild collection and trade in cultivated and wild-collected species in origin comply with international, national or local laws and regulations. Cultivation and wild

collection activities in protected areas are only carried out with exceptional permits. We require our suppliers to ensure that the cultivation or wild harvesting of plant-based raw materials or related activities does not lead to the conversion or interference of intact ecosystems.





### **1.3 Ethical business conduct**

To meet our ethical responsibilities, you are expected to act in accordance with the following laws and compliance rules.

#### **1.3.1 Compliance with applicable laws**

You must comply with the relevant legislation, applicable legal order, contractual agreements and generally accepted standards.

#### **1.3.2 Measures to prevent corruption, bribery and money laundering**

In our business dealings, we reject unauthorised means and impress with our competence and quality.

We prohibit bribery, corruption, extortion or embezzlement of any kind, and we do not grant, solicit, request or accept any improper benefits, gifts, payments or other unlawful induce-

ments of any kind in connection with our business activities. Every employee must avoid the appearance of a conflict between their personal interests and professional obligations.

Contributions are only granted by Finzelberg employees in a transparent manner. Gifts, business meals and events for information, representation or entertainment purposes may be a legitimate means of building and supporting business relationships. However, they must never serve to obtain unfair commercial advantages and be carried out to an extent or in a manner that is likely to call into question the professional independence and judgement of the parties involved. Particular caution is required for public officials. No invitations or gifts are permitted here. You must also comply with all the applicable anti-money laundering laws and implement the required measures to prevent money laundering activities.

### 1.3.3 Conflicts of Interest

As an employee, we expect you to be loyal to us and make business decisions in the interest of Finzelberg. Business actions or decisions that are influenced by personal or private interests may conflict with the company's interests. Financial investments that you or persons close to you hold in competitors and business partners are part of this, as are secondary activities, and can lead to conflicts of interest.

As a nature network employee, you must disclose such conflicts in advance to protect yourself and our group of companies.

### 1.3.4 Fair competition and antitrust law

We strive for sustainable business relationships for mutual benefit with our customers and business partners.

Their interests may not be placed in the foreground to the detriment of other customers. As an employee, you are obliged to comply with the applicable provisions of competition and antitrust law.

We are also committed to fair competition. Laws protecting competition, in particular antitrust law and other laws regulating competition, are to be observed. Impermissible agreements on prices or other conditions, sales territories or customers as well as abuse of market power contradict the principles of our company. We do not participate in illegal anti-competitive agreements and conduct.

### 1.3.5 Confidentiality, data protection and intellectual property

As a Finzelberg employee, you have the responsibility to adequately protect information about our company

and our business partners in your area of influence. Information may only be made accessible to persons who require it for business reasons (need-to-know principle). Information must be stored and processes designed so that it is available when required. It must not be possible to change data undetected.

The protection of employees' personal data is particularly important to us. We ensure that the legal requirements for

the processing of personal data with regard to collection, storage, processing, transmission and transfer are complied with.

Tangible and intangible assets of our group of companies are among the values to be protected. This includes facilities and systems as well as patents, licences or company know-how. As employees, these assets may only be used for business purposes, unless private use is expressly permitted.







## 2. Quality – Continuous Improvement – Customer Satisfaction



## 2. QUALITY – CONTINUOUS IMPROVEMENT - CUSTOMER SATISFACTION

The satisfaction of our customers is the basis of Finzelberg's entrepreneurial success. The quality and safety of our products are an essential part of this. We comply with regulatory requirements and security standards and guaranteed agreements with our customers.

If problems arise, we approach our customers at an early stage; customer suggestions and complaints provide valuable information about opportunities for improvement in our business and offer an opportunity to strengthen or regain customer relationships. We ensure that all customer complaints are dealt with promptly in a fair and understandable manner.

We are ambitious in continuously improving our quality and safety standards in order to offer our customers the best quality. As employees, you are the decisive factor here. Utilising your knowledge, skills and commitment is an essential part of our culture of improvement. We expect you to contribute your ideas and suggestions and to communicate errors openly. Innovation and continuous improvement are key drivers for our success. This is the only way we can develop further as a company, be in a position to develop innovative products and processes as well as technologies, and be able to assure our customers of the highest quality and safety standards in the long term.





# **3. Implementation, raising concerns and consequences of violations**

## 3. IMPLEMENTATION, RAISING CONCERNS AND CONSEQUENCES OF VIOLATIONS

### 3.1 Implementation

This Code of Conduct provides the framework for more detailed information on the topics addressed. Approved and valid procedural instructions, checklists, forms as well as contact persons and representatives in the company make this code more specific.

As an employee, you are called upon to apply Finzelberg's principles of conduct in your daily life and to embody integrity. Training and instruction will help you understand, internalise and act according to the Finzelberg Code of Conduct.

Managers serve as role models when it comes to implementation. They disclose the contents of the Code of Conduct in their area of responsibility and are

responsible for their own conduct and that of their employees as well as for proper compliance with all procedures provided therein to avoid reputational and legal risks.

If you are not sure about the classification of an action or activity in accordance with this Code of Conduct within the company, please speak directly to your responsible manager.

### 3.2 Raising concerns and reporting violations

We encourage you to confidentially report concerns, complaints or potentially unlawful activities at work or in business, without risk of reprisal, intimidation or harassment.







If, as an employee of Finzelberg or even external third parties, you have to assume in good faith that there has been a violation of the provisions of this Code of Conduct, in the spirit of an open and unbiased culture of handling mistakes, you can contact the supervisor, the management, the works council or the compliance officer with your concerns. Your report will be treated confidentially and will not lead to any disadvantages - even if the report turns out to be unfounded. Intentional false reports will be punished accordingly.

In addition to contacting the people mentioned directly, you can also use anonymous reporting channels, if necessary. These reporting channels

and information and complaint systems correspond in particular - but not exclusively - to the German Whistleblower Protection Act and the German Supply Chain Due Diligence Act.

### **3.3 Consequences for violations**

Violations of the provisions of this Code of Conduct can result in significant reputational loss and legal disadvantages for Finzelberg, its employees and business partners, including fines, criminal proceedings or restrictions on official permits. Even a negligent infringement may damage our business or be harmful to our appearance in the public.