TRANSGOURMET

Code of Conduct for Business Partners

Code of Conduct for Business Partners of Transgourmet Austria

Transgourmet Austria takes responsibility for people, animals and the environment in its activities. In addition to nutrition and health, animal welfare, and agriculture, our commitment also encompasses environmental protection and climate change, as well as our employees and society. Our stance on these issues can be found in our sustainability strategy (available here). Transgourmet Austria also assumes responsibility for these issues in its supply chains.

Our business partners take an important role in implementing Transgourmet Austria's sustainability strategy and legal requirements. This code of conduct contains the principles that Transgourmet Austria's business partners must adhere to.

Legal compliance

Our business partners comply with all applicable laws and regulations, particularly in the areas of business ethics, human rights, and working conditions, as well as health, safety and the environment and ensure appropriate implementation within their own companies and supply chains.

As a subsidiary of the Coop Group, Transgourmet Austria is a member of various organizations and initiatives and is committed to upholding their values and principles. This goes hand in hand with Transgourmet Austria's obligation to influence its supply chains with reasonable and appropriate measures. Our business partners undertake to comply with the values and principles of these organizations and initiatives, above all the amfori BSCI Code of Conduct and its implementation conditions. They transfer this obligation to the business partners in their supply chain.

Transgourmet Austria has proven standards and guidelines in many areas of sustainable procurement that may go beyond legal requirements and regulations. Our business partners undertake to comply with the Sustainable Procurement Guideline and all applicable guidelines and to implement them appropriately. These are published on our website (available here).

Business ethics

Our business partners

- are committed to integrity and ethical business practices.
- do not tolerate any form of corruption, either towards authorities or in business relationships. They have appropriate measures in place to prevent corruption and bribery and ensure that no personal payments or other personal benefits are promised or granted to employees of Transgourmet Austria in an attempt to influence their actions or decisions.
- handle gifts and invitations in an appropriate and reasonable manner and ensure that these cannot be perceived as undue influence. Gifts and invitations of low value that are appropriate to the situation and within the scope of normal business and social appreciation and customer care are permitted.
- avoid conflicts of interest that could influence dealings with authorities or the business relationship with Transgourmet Austria or disclose them as early as possible; in doing so, they avoid even the appearance of possible conflicts of interest.
- are committed to fair competition and conduct their business in accordance with applicable antitrust laws. They do not participate in illegal agreements, abuse their market position and

act with the necessary caution when exchanging information. They are careful not to place Coop Group companies, such as Transgourmet Austria, in situations that could be sensitive from an antitrust perspective.

- respect the intellectual property rights of Transgourmet Austria and third parties. They protect the trade secrets and confidential information of Transgourmet Austria and uphold the corresponding rights of the company, its customers and stakeholders.
- ensure that they do not directly or indirectly promote money laundering or terrorism.
- handle personal data in a reasonable and appropriate manner, process it only for legitimate purposes and in accordance with applicable data protection laws and take all necessary and reasonable measures to ensure data security.
- consider applicable import, export, and customs regulations and ensure compliance with relevant embargoes and sanctions.
- procure and process minerals and metals in accordance with applicable laws and regulations as well as internationally recognized standards. This applies in particular to ores, concentrates and metals containing tin, tantalum, tungsten or gold. They have appropriate measures in place to comply with legal due diligence and reporting obligations regarding minerals and metals from conflict-affected and high-risk areas.
- ensure that they comply with the legal transparency and reporting obligations for raw material companies if they themselves or a company controlled by them are active in the extraction (including exploration, prospecting, discovery, development and production) of minerals, oil and natural gas deposits and the logging of primary forests.

Human rights and fair working conditions

Our business partners

- ensure fair working conditions and compliance with internationally recognized human rights, paying particular attention to vulnerable individuals and groups such as children, women, migrant workers and indigenous communities.
- do not tolerate child labor. They do not employ children under the legal minimum age (and in no case those who are subject to compulsory schooling or who have not yet reached the age of 15) and take appropriate measures to verify age before hiring. When employing young people under the age of 18, they ensure that the special legal protection provisions are complied with. They have appropriate measures in place to comply with legal due diligence and reporting obligations regarding child labor. If a case of child labor is nevertheless identified, the business partners take appropriate remedial measures to protect the child from child labor and ensure that the child does not end up in an even worse situation due to loss of income;
- do not tolerate any form of forced or compulsory labor, servitude, bondage or other involuntary labor and ensure that they do not contribute to exploitation, oppression or human trafficking;
- treat employees with respect and ensure a working environment that is free from harassment, discrimination and violence;
- recognize the right of their employees to associate, form and join trade unions, organize interest groups, join works councils and participate in collective bargaining;
- ensure safe and healthy working conditions and comply with applicable occupational health and safety requirements;
- ensure that statutory working hours and rest periods are observed and pay wages and other benefits as well as compensation for overtime, night work, etc. that at least meet the statutory standards; and
- strive to ensure decent employment and avoid precarious employment that leads to social or economic vulnerability for employees or does not provide a living wage.

Health, safety and environment

Our business partners act in accordance with legal requirements, internationally recognized standards and the Transgourmet Austria Policy Papers (available here) concerning health, safety and the environment and are committed to environmental and climate protection.

Implementation of the principles of this Code of Conduct

Our business partners commit to the principles of this Code of Conduct by providing the resources necessary for its implementation and by having an appropriate management system in place. They assess their risks at regular intervals and define suitable and appropriate prevention, detection and remedial measures, the effectiveness of which is reviewed regularly. The measures may include, for example, a training program and a reporting or complaint system through which concerns about possible violations can be reported confidentially. Our business partners fulfill their internal reporting obligations and ensure continuous improvement of compliance management.

Our business partners comply with their legal reporting obligations and their due diligence obligations with regard to their own supply chains and make reasonable efforts to ensure that their own business partners comply with the principles of this Code of Conduct.

Transgourmet Austria reserves the right to verify compliance with the principles of this Code of Conduct by its business partners.

Our business partners are requested to report any suspected violations of this Code of Conduct to Transgourmet Austria via our online reporting platform.

SIGNATURE SHEET

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Place, Date	Place, Date
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Signature business partner	Signature business partner
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Position	Position