

# **Code of Conduct**

August 2023

EW GROUP is committed to achieving the highest standards of legal, honest, and ethical conduct for itself, its directors, officers, and employees. The Group has adopted this Code of Conduct and Ethics to provide guidance to our directors, officers, employees, and contractors in recognizing and dealing with ethical issues and other matters important to the Group. Furthermore, the Code of Conduct establishes mechanisms for reporting unethical or illegal conduct and other violations of this guideline and helps in fostering and maintaining a culture of honesty and accountability throughout the Group and its value chains. It is, therefore, mandatory that all directors, officers, employees, and contractors adhere to this Code of Conduct.

Nothing contained herein shall be construed or applied as a binding interpretation or definition of the law or industry practice. Any act by a director, officer, or employee in violation of the law or of this Code is beyond the scope of such person's authority and is not an act by or on behalf of the Group. The Code shall be reviewed periodically by the Group and, if necessary, changed to reflect changing or additional needs for corporate compliance. In this way, we will ensure to provide Group Representatives with continuously better guidance.

This policy statement on human rights and environmental activities complies with the requirements of the German Supply Chain Due Dilligence Act. Since the EW Group was founded in 1999, the focus on animal husbandry and animal welfare has made ecological and socially responsible corporate governance an integral part of our global business processes. In this regard, the Group holds itself to a high standard and expects the same behavior from all our suppliers and business partners. In addition, the Group wants its employees to follow the principles of ecological, social, and ethical conduct and, thus, to actively integrate them into our corporate culture. Furthermore, the Group strives to continually improve the sustainability of our corporate processes and services.

#### **ENCOURAGING THE REPORTING**

# OF ANY ILLEGAL OR UNETHICAL BEHAVIOR OR OTHER VIOLATIONS

To ensure that the spirit and intent of this Code of Conduct are realized, the Group encourages employees to talk to supervisors, managers, or Human Resources representatives when in doubt about the best course of action in a particular situation.

To encourage employees to report any and all such violations, the Group will not tolerate retaliation for reports made in good faith by any employee of the Group. Retaliation or retribution against any employee for the reporting in good faith of violations of laws, regulations or this Code of Conduct is cause for appropriate discipline, including termination of employment. All reports of potential

retaliation will be addressed to the Head of Human Resources and the Regional President. Violations of the Group standards of business conduct and ethics enumerated in this Code of Conduct are cause for appropriate discipline, including termination of employment.

#### **CONFLICTS OF INTEREST**

The Group prohibits conflicts of interest. A conflict of interest occurs when an individual's private interest interferes in any way— or even appears to interfere—with the Code of Conduct. A conflict situation can arise when you take actions or have interests that may make it difficult to perform your work objectively and effectively. Conflicts of interest also arise when you or a member of your family receives improper personal benefits as a result of your position in the Group. Loans to, or guarantees of obligations, such persons are of special concern. These benefits may neither be granted nor be accepted. The Group expects suppliers to do business with EW Group only based on factual criteria.

## **FAIR DEALING & Corruption**

EW Group does not tolerate corruption and expects suppliers and business partners to comply with applicable national anti-corruption laws. All Representatives should make every effort to deal fairly with the Group's customers, suppliers, sister companies, owners, competitors, and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other unfair-dealing practice. All relevant stakeholders should comply with pertinent anti-trust laws. The group does not condone any involvement in money laundering activities.

#### **COMPLIANCE WITH LAWS, RULES, AND REGULATIONS**

The Group requires compliance with all applicable laws, rules, and regulations. Set forth below is a broad overview of the Group's policies with respect to those laws. This overview is not, nor is it intended to be, an exhaustive list of the Group's policies pertaining to compliance with laws. EW Group expects suppliers and service providers to take this Code of Conduct into account when selecting their own suppliers.

#### **ENVIRONMENTALHEALTH, AND SAFETY**

It is the Group's policy to fully comply with all local environmental, health and safety (EHS) laws and regulations. Many activities the Group undertakes are regulated by these laws. In addition to operations and production, the handling and transportation of materials, products, and waste are regulated by various federal, state, and local laws. The Group is aware that its business activities have an impact on EHS. The Group requires that suppliers and service providers comply with applicable national environmental and safety laws, regulations, and standards to minimize any potential negative harms to EHS due to business activities. In this regard, suppliers and business partners should define and establish clear guidance on the safe handling, storage, transport, use, and disposal of (hazardous) waste in accordance with applicable laws and regulations.

#### **HUMAN RIGHTS**

EW Group respects the rights of every individual and abide by the employment laws in the markets where the group operates. She supports the principles established under the United Nations Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that participates in the exploitation of child labor, physical punishment, forced or prison labor or Human Trafficking.

EW GROUP adheres to the highest standards and treats its employees, customers, and business partners with integrity and respect. Consequently, EW GROUP respects the human rights of its employees and requires the same from its business partners. Compliance with the strictest available



local standards and ILO core labor standards is critical. In particular, the Group requires adherence to the following concepts related to the organization of working conditions:

- compliance with the prohibition of child and forced labor
- equal treatment and opportunities for all employees
- no tolerance of any form of discrimination
- ensuring health and safety in the workplace
- granting remuneration at least equal to the minimum wage guaranteed by law, with working hours in accordance with applicable standards
- protection of personal data in accordance with the General Data Protection Regulation
- recognizing the right of all employees to form employee representative bodies and to engage in collective bargaining to regulate working conditions

### **SUPPLY CHAIN Due Diligence ACT**

In order to comply with international human rights standards, national laws, and EW GROUP policies, the group conduct the required human rights due diligence to identify, analyze, and mitigate potential and actual human rights violations related to our business operations as well as supply chain. This includes a company-specific risk categorization of business partners and goods based, for example, on the examination of recognized indices and studies for the risk assessment of countries of origin, raw materials, and products.

In case that the group determine that business, activities pose a risk of causing or contributing to human rights abuses, the group has a process in place to assess, modify, cease, and/or remedy the activities that are causing them. The Group encourages their employees to report suspected violations of Declaration of Principles on Respect for Human Rights through available grievance procedures.

Suspected violations of human and environmental rights can be reported confidentially at any time via an established complaint mechanism. Both our employees and the employees of our suppliers and business partners have the opportunity to report potential violations this way.

# **Animal Welfare**

The Group's policy is to fully comply with all state, federal, and foreign Animal Welfare laws. EW GROUP is committed to humane treatment of the animals in its care and its value chains. The Groups welfare procedures will meet or exceed industry standard practices which follow the guidelines and requirements set by industry organizations. All representatives involved with the handling of animals must comply with Groups policies and understand their responsibilities to ensure the welfare of the animals in their care.

#### **Fair Employment Practices**

The Group's policy is to fully comply with all laws requiring recruiting, hiring, placing, training, compensating, promoting, transferring, and terminating employees. These actions are based on job-related qualifications and performance without regard to race, color, religion, national origin, veteran status, gender, sexual orientation, age or disability unrelated to the performance of essential tasks of the position, or other factors protected by applicable federal, state or local laws.

