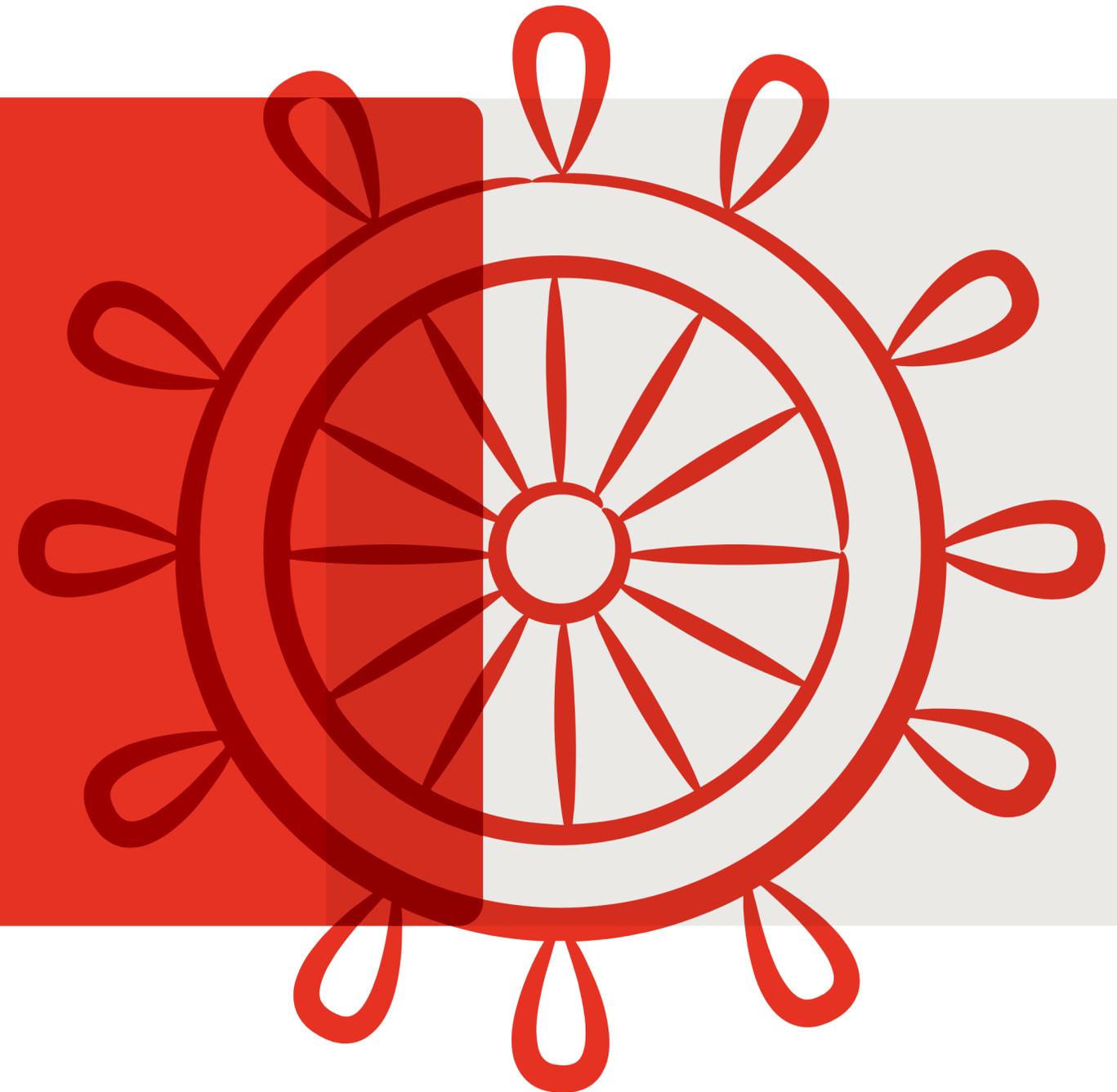




**Intersnack**  
Group

# *Code of Conduct*

Status: February 2022



# Foreword

Intersnack Group looks back on a great track record in branded and non-branded business which we all can be proud of.

Our success is based on our strong commitment to our core values, on acting with integrity and trust, and has led to a strong reputation in the markets in which we compete. Building up a positive reputation takes many years but can be destroyed from one day to the other through lack of standards and individual misbehaviour. We as Executive Board are therefore committed to ensuring that leading practices of good corporate governance are observed throughout Intersnack Group .

This Code of Conduct is intended to provide basic guidance in our everyday working life and is to be seen as an addition to our core values. Our understanding of ethical, morally and legally compliant conduct is outlined in seven principles, which shall be valid for all of us. In case of any doubts concerning appropriate conduct, please get in touch with your Line Manager or ask the Compliance Officer in your organisation.

Group Compliance is also at your disposal for any discussion or further advice.

Intersnack Group is committed to compliance with all applicable laws and regulations. In addition, with respect to specific compliance relevant topics, we will regularly provide further information in the form of guidelines, policies and trainings.

Please take time to carefully read through the Code of Conduct. Use these principles as a guide in all of the work you do and the decisions you make.

**Executive Board**  
**Intersnack Group GmbH & Co. KG**

## 1. We produce quality snacks to the highest standards.

Food safety is our top priority. We are all responsible for ensuring that consumers can trust the safety and quality of our products.

Our products and processes always comply with, or exceed, both legal and industry standards for consumer health and safety. In order to ensure constant safety and consistent quality we employ a range of standardised processes and professional food safety policies. We monitor and control our complete supply chain and select suppliers according to stringent criteria.



## 2. We always act with integrity.

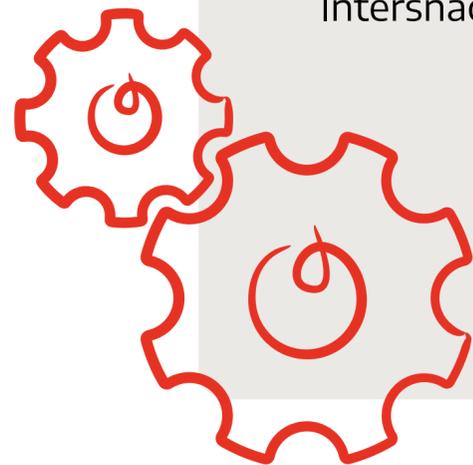
We say what we mean and mean what we say. We expect the same transparency and honesty from all employees and everyone we conduct business with. We model ethical behaviour in all our dealings with customers, suppliers and business partners, and we comply with all applicable laws and regulations.



### 3. We deal honestly and in the best interests of Intersnack Group.

We conduct our business openly, honestly and ethically. We base our principles on fair business conduct and good faith. We give Intersnack Group our complete business loyalty.

We avoid conflicts between personal interests and those of Intersnack Group. We respect company property and treat its facilities with care. We keep Intersnack Group's business information confidential.



### 4. We condemn all forms of bribery and corruption.

We do not bribe and we do not tolerate bribery. We never offer or provide money, gifts or other benefits in order to gain unlawful preferences or advantages for Intersnack Group. We do not ask for any personal benefit from a business partner. We categorically refuse any personal benefit if it might be intended to influence our business decisions.

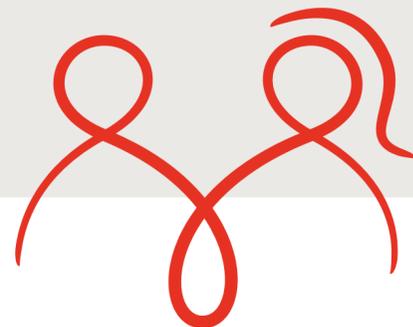


## 5. We treat people fairly.

We treat people with fairness. Everyone deserves an equal opportunity to succeed based on their performance, talent and commitment to Intersnack Group values.

We promote entrepreneurial behaviour and want to grow together with our people and business partners. We are committed to maintaining a work environment that is free from harassment and discrimination. We provide a safe and healthy workplace wherever we work.

We act as a responsible corporate citizen in every local community in which we operate.



## 6. We compete fairly and respect the free market.

We are committed to honesty, integrity and fairness in our business. We also expect our suppliers and business partners to adhere to these values.

We comply with all competition and antitrust laws. We are committed to compete on the merits, and offering prices that result from free competition. We respect the legitimate interests of our customers and suppliers.

We grow and improve in a competitive marketplace.



## **7. We respect the environment and conduct our business in a socially responsible manner.**

We believe that profit-oriented growth, care of the environment and contributing to sustainable social development go hand in hand.

We therefore strive to reduce the impact of our operations and supply chain on the environment by optimizing energy and water usage, monitoring air pollution and minimizing waste generation. We ask our suppliers to systematically improve the social, environmental and ethical aspects of their products and processes, and we assist them in doing so when feasible.



## **The Principles of our Code of Conduct**

- 1. We produce quality snacks to the highest standards.**
- 2. We always act with integrity.**
- 3. We deal honestly and in the best interests of Intersnack Group.**
- 4. We condemn all forms of bribery and corruption.**
- 5. We treat people fairly.**
- 6. We compete fairly and respect the free market.**
- 7. We respect the environment and conduct our business in a socially responsible manner.**

## Seeking guidance

No set of principles can provide answers to every situation we might encounter at work.

What should we do when these seven principles don't cover a specific situation we are confronted with?

### Remember our core values.

Everything we do is based on our vision and our core values. They should guide us each and every day!

We should always ask questions when we are not sure how to act. We have various people we can turn to: our Managers, Compliance Officers and the Legal Department. Group Compliance is also available for support.

Acting  
*entrepreneurially*



Thinking  
*responsibly*



Growing  
*together*



## Speaking Up

If you notice something wrong at Intersnack Group, or one of its companies, what should you do?

Every staff member should feel empowered to take actions when something does not feel or look right. If you think someone may have violated the law, the spirit of this Code of Conduct, or any other company policy: Please speak up!

Speak to your Manager (provided s/he is not involved in the violation), or contact Human Resources, the Legal Department, a Compliance Officer or a member of the Management Board.

If you experience a personal conflict of interest, or you want to speak to somebody not involved at local level, you can always contact Group Compliance:

**Postal** Group Compliance  
(private and confidential)  
Intersnack Group GmbH & Co. KG  
Klaus-Bungert-Straße 8a Süd  
40468 Düsseldorf

**Email** [compliance@intersnackgroup.com](mailto:compliance@intersnackgroup.com)

In addition, we have set up an electronic whistleblower system for reporting concerns or compliance incidents. You can access the web-based whistleblowing system via:

[www.bkms-system.com/intersnackgroup/](http://www.bkms-system.com/intersnackgroup/).

We investigate any actual or suspected Code of Conduct violations promptly, fairly and in accordance with legal obligations.

It is helpful if you identify yourself when you report any suspicions or Code of Conduct violations as it enables us to contact you for further information and follow-up. You may, however, report any actual or suspected violations anonymously.

We will maintain confidentiality to the greatest extent possible while fulfilling our obligations to investigate possible breaches and to act legally at all times. We encourage people to communicate openly and honestly.

We will not tolerate any forms of retaliation against any individual who, in good faith, discloses any actual or suspected violations. On the other hand, we do not accept any deliberately inaccurate, insulting, or defamatory reports.



**Intersnack**

**Contact information:**

Intersnack Group GmbH & Co. KG

Klaus-Bungert-Straße 8a Süd, 40468 Düsseldorf

**Email:** [compliance@intersnackgroup.com](mailto:compliance@intersnackgroup.com)