

# ● CODE OF CONDUCT



**UNION** AGRICOLE

**BIOTIC** SCIENCE

**ENBYCON**



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# ● FOREWORD BY THE EXECUTIVE BOARD

Dear colleagues,

as part of the Huelsenberg Group, we are jointly mastering the challenges of the future in the fields of agriculture, renewable energies and biotechnology through convincing quality, continuous innovation and ecologically sustainable growth.

We are a value-orientated group of companies and our self-image is based on principles such as honesty and respect – both in our dealings with our business partners and with each other. We are highly committed to the longterm and sustainably successful development of the agricultural subgroups for the benefit of our employees and shareholders. Compliance with applicable national laws and regulations as well as international standards is a matter of course for us and the cornerstone on which we base our daily work.

In order to maintain a corporate culture based on trust and integrity and to ensure our sustainable corporate success, this Code of Conduct is binding for all executive bodies, managers and employees of the companies affiliated with the agricultural subgroups. Everyone is required to familiarise themselves with the contents of this Code of Conduct and to act accordingly. In cases of doubt, anyone can obtain additional information and advice from the relevant departments.

The Management Boards of Union Agricole Holding AG, Biotic Science Holding AG and Enbycon Holding AG have adopted this Code of Conduct as the foundation of a value system for the agricultural subgroups and report regularly to the Supervisory Boards. The agreed principles of this Code of Conduct form the basis for responsible, ethical and legally compliant behaviour. Decisions that we make in the group are always based on the guidelines of this Code of Conduct and can be measured against them.

We also apply this standard to our business partners, and in particular the suppliers and service providers we commission, and oblige them to comply with the principles of our Code of Conduct. Violations of this Code of Conduct can easily lead to serious consequences and lasting reputational damage for the agricultural subgroups and their employees. They can not only result in disciplinary measures or the termination of business relationships with customers and business partners, but may also lead to measures being taken by government authorities.

Only through our joint, responsible behaviour can we ensure the continued sustainable success of our group of companies. We are aware that situations can arise in day-to-day business that are challenging to categorise spontaneously. In order to make these situations manageable for you, the Board of Management of the agricultural subgroups has issued this Code of Conduct to provide you with guidance and reassurance.

We therefore ask you personally to familiarise yourself with this Code of Conduct, to regularly remind yourself of its contents and to make it the basis of your daily work for our group of companies.

Pinneberg, December 2024

The Executive Board of

**UNION AGRICOLE**  
**BIOTIC SCIENCE**  
**ENBYCON**



Dr. Edmund Mathies

Dr. Martin Rimbach

Dr. Johann Hammerer

Gerald Jandrisovits

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# COMPLIANCE, RESPONSIBILITY AND WHISTLEBLOWER SYSTEM



We expect all bodies, managers and employees to treat each other with respect.

**Compliance means that we observe the laws and internal rules that apply to us**

In cooperation with Huelsenberg Holding GmbH & Co. KG as the parent company of the Huelsenberg Group and the supervisory bodies, the Board of Management of the agricultural subgroups sets the guidelines and priorities for the necessary structures and actively demonstrates how to deal with them.

**All employees are obliged to comply with this Code of Conduct. As part of our group of companies, each of us is responsible for our own behaviour and its impact.**

All employees and affected parties have the opportunity to anonymously report potential violations of this Code of Conduct or applicable laws and internal regulations, as well as questions and cases of doubt, to the internal complaints office via a whistleblower system. The multilingual whistleblower system can be reached via our website. The system forwards all reported issues to the Huelsenberg Holding Compliance Team. The identity of the whistleblower will only be disclosed to the processing team, Huelsenberg Holding GmbH & Co. KG or an affiliated company or any other third party if this is initiated by the whistleblower themselves.

Reports from whistleblowers are treated confidentially and are privileged by law. It is irrelevant whether the suspicion proves to be true or not. However, deliberately false accusations will not be tolerated. Anyone who retaliates or attempts to retaliate against whistleblowers will be subject to disciplinary action. Retaliation includes, for example, exerting pressure or threatening employees so that they do not report the suspected offence.

## WE VALUE RESPECTFUL COOPERATION

We expect all bodies, managers and employees to treat each other with respect. We promote and cultivate fair, empathetic and polite interaction as the basis for a positive corporate culture. Our aim is to create a working atmosphere in which everyone feels comfortable.

**We also maintain this standard in our dealings with customers, business partners, authorities and other contacts.**

## WE ENSURE SAFETY IN THE WORKPLACE AND LOOK AFTER THE OVERALL HEALTH OF OUR EMPLOYEES

We promote the health and safety of our employees. In particular, we provide a safe and healthy working environment that is designed to prevent accidents and injuries. This includes legally compliant fire protection, monitoring electrical safety, maintaining machine safety through preventive maintenance and servicing as well as measures for the personal protection of employees. The implementation of occupational health and safety is equally the responsibility of the executive bodies, managers and all employees. Every report of unsafe or unhealthy working conditions should be investigated immediately – in collaboration with line managers, the occupational safety specialist or the HR department – and unsafe or unhealthy working conditions should be eliminated.

**Every employee must take the protection of their own health and the health of colleagues and third parties seriously.**

## WE ACT IN ACCORDANCE WITH HUMAN RIGHTS, LABOUR AND SOCIAL STANDARDS

We are committed to respecting internationally recognised human rights. We honour and respect the dignity of our employees, customers and business partners in equal measure. Our actions are always in accordance with human rights and binding international labour and social standards. **In particular, we do not tolerate child, punitive or forced labour, human trafficking, slavery or other forms of exploitation and discrimination.**

We promote diversity and inclusion. We do not tolerate any kind of discrimination, such as discrimination based on gender, age, skin colour, physical appearance, ethnic origin, nationality, religious affiliation or ideology, sexual orientation or sexual identity, physical or mental disability or trade union activity. We expect all our bodies, managers and employees to stand up for the dignity of every individual and to promote a culture of belonging/inclusion.

We do not tolerate harassment or abuse of persons. We reject physically, mentally and emotionally inappropriate treatment of persons. This does not include factual criticism, in particular in the event of violations of this Code of Conduct, as well as orders issued in accordance with legal requirements in the context of employment relationships.

**We always comply with the applicable rights and provisions for freedom of assembly and association and collective bargaining as well as the statutory and collectively agreed regulations to ensure fair working conditions.**

Cooperative collaboration with employee representatives is an important part of our actions.



We reject physically, mentally and emotionally inappropriate treatment of persons.



# WE ARE COMMITTED TO SUSTAINABLE MANAGEMENT



Sustainable management is an integral part of our actions. We believe that through our industrial and agricultural activities, we make a positive contribution to climate protection, education, industry, innovation and infrastructure, life on land, water consumption and quality and the circular economy. We pursue the continuous task of sustainable management across the entire value chain in order to make our purchasing, our processes and our products sustainable.

**In cooperation with all our stakeholders, we are committed to a better future that not only fulfils the needs of today's generation, but also takes into account the needs of future generations.**



# ENVIRONMENTAL PROTECTION IS IMPORTANT TO US

Thinking and acting with the environment in mind is an integral part of our corporate culture and our daily work. We act proactively and preventively to protect the environment. Our goal is to achieve holistic environmental protection. We pursue this through all our activities as well as the services and products of the agricultural subgroups.

We are committed to complying with the applicable laws and guidelines as well as other binding obligations in order to continuously improve the environmental performance of our group of companies and avoid environmental pollution. In order to continuously reduce the negative environmental impact of our business activities, we use the resources

we need as efficiently as possible and work towards the development and dissemination of environmentally friendly technologies and the proper disposal of waste as a valuable resource. We expect all employees and business partners to comply with and monitor all relevant legal and other regulations and requirements as well as substance bans and restrictions on an ongoing basis

**The gradual expansion of environmental management systems is an essential basis for this. At the same time, it is the primary instrument for managing and continuously improving our environmental performance.**



We use the resources we need as efficiently as possible.

## WE PAY ATTENTION TO PRODUCT CONFORMITY AND SAFETY



Our business is built on the quality of our products and services. At every stage of the design, development, production and distribution of products and in the provision of services, we ensure compliance with legal and internal company requirements and attach great importance to using only primary products and materials that also fulfil these requirements.

**We comply with the applicable regulatory requirements with regard to product development and maintenance, production, certification and authorisation. We ensure this through continuous further education and training.**

## WE ARE COMMITTED TO RESPONSIBLE PROCUREMENT

The agricultural subgroups procure their raw materials responsibly and in accordance with applicable legal regulations and expect the same from their suppliers and service providers. We expect our suppliers to con-

firm conformity with the Supply Chain Due Diligence Act (SCDDA). We require our suppliers to inform us immediately if they are unable to provide such a declaration.



# WE COMPLY WITH THE RULES OF FAIR COMPETITION



We refrain from any unauthorised exchange of competition-sensitive information.

**Our global operations mean that we are in constant competition. Fair, lawful and honest competition is essential for the sustainable success of our group of companies and the benefit of our customers.**

One of our fundamental principles is that all of our executive bodies, managers and employees act in accordance with the relevant and applicable competition and antitrust regulations. Any suspicion of a violation of applicable competition or antitrust law is investigated and recognised violations are pursued and remedied.

For this reason, the entire group is subject to the standard of not entering into any unlawful agreements with competitors regarding prices, price increases, discounts, conditions, capacities, profit, margins, costs, sales and marketing methods or other factors relevant to competition. We refrain from any unauthorised exchange of competition-sensitive information or concerted practices with our competitors, and do not enter into any agreements with competitors regarding non-competition, the submission of bids for tenders, the allocation of customers, markets, regions or product portfolios or the restriction of business relationships with suppliers. We do not use participation in association conferences, professional circles, committees, trade fairs or other industry meetings to share confidential and market-relevant company information with employees of competitors or business partners.

**We do not abuse any existing dominant market position to the detriment of our customers and other business partners.**

As violations of competition and antitrust regulations can result in considerable reputational damage as well as high financial, criminal and fine consequences, we are raising awareness not only internally, but also among our business partners and customers. In cases of doubt, the legal department of the Huelsenberg Group should be contacted or the whistleblower system utilised.

# WE ARE COMMITTED TO FIGHTING CORRUPTION AND BRIBERY

Our global business activities require us to comply with national and international laws and regulations on the prevention of corruption. We are committed to combating all forms of bribery, corruption, the acceptance and granting of advantages and fraud and do not tolerate any violations of applicable law. We avoid any form of direct or indirect undue influence on business partners.

All executive bodies, managers and employees are prohibited from directly or indirectly demanding, accepting, offering or granting unauthorised advantages in their business activities, whether in the form of monetary payments, gifts or other benefits or services.

**We are aware that granting or accepting such benefits exposes the entire group to legal risk and damages our business relationships and reputation.**

The behaviour of all executive bodies, managers and employees must at no time give the impression that benefits of any kind could be understood or regarded as consideration for specific, desired behaviour when acting on behalf of our group. We are convinced solely by objective criteria. Private interests, relationships, material or immaterial personal benefits or other conflicts of interest do not guide our behaviour and business conduct at any time. In our opinion, a conflict of interest to be avoided already exists if the objectivity of the decision-making process of the person concerned could be influenced by their own interests or the interests of third parties.

We only give and receive gifts in kind of low value. We ensure that the invitations we receive or issue are not made in advance of invitations to tender and are appropriate to the recipient's position. We do not accept cash or cash-like gifts, such as vouchers, from business partners. We do not offer business partners any non-material benefits, such as free professional or private services. We are aware of the increased legal requirements when dealing with public officials and persons treated as public officials and we comply with them. We check in advance of the business activity whether we are dealing with public officials or persons treated as public officials under the relevant legal system.

We are aware that donations, sponsoring services and memberships can also involve corruption. Donations, sponsoring services and memberships must always be compatible with the applicable law and the principles of the Huelsenberg Group. Donations, sponsoring services or memberships may not be granted in connection with ongoing contract negotiations or business transactions of any kind.

If you have any questions about whether a particular benefit or the acceptance of a benefit is in line with this Code of Conduct, please contact your line manager or the Huelsenberg Group Legal Department.



## WE COMPLY WITH ANTI-MONEY LAUNDERING LAWS

**We only enter into business relationships with business partners where our business activities with them comply with the statutory provisions. We check the true beneficial owners of our contractual partners and keep the information up to date.**

No governing body, manager or employee may, either alone or with others, commit acts that violate national or international rules on money laundering or terrorist financing. If there is any doubt about the permissibility of transactions involving the transfer of cash, the management must be consulted at an early stage.

In cases of suspicion or doubt, we inform the responsible managers, the Executive Board or the legal department of the Huelsenberg Group. The anonymous whistleblower system is also available to us.



## WE COMPLY WITH FOREIGN TRADE REGULATIONS

For foreign or security policy reasons, embargoes may be imposed that restrict the freedom of foreign trade with certain countries or persons. As a globally active group of companies, we comply with the currently valid and applicable export and re-export control laws as well as the nationally and internationally applicable country and personal sanction regulations (embargoes).

All executive bodies, managers and employees are obliged to strictly comply with import and export control laws. We ensure that we do not violate applicable foreign trade laws, embargoes and sanctions. To this end, we involve the relevant colleagues from the specialist department in the audit and keep the information about our contractual partners and their enduse customers as well as their true beneficial owners up to date.



All executive bodies, managers and employees are obliged to strictly comply with import and export control laws.

# WE ARE COMMITTED TO PROTECTING THE COMPANY'S ASSETS

**Within our area of activity, every business organisation, every manager and every employee is obliged to protect and handle the Huelsenberg Group's company property and intangible and tangible assets responsibly and sustainably.**

Tangible assets include all items such as infrastructure, buildings, land, equipment of any kind, products and materials, vehicles, IT equipment and any form of records and documents. Intangible assets include intellectual property, know-how, industrial property rights, technologies, trade secrets and other information that is valuable and important to the Huelsenberg Group and therefore needs to be protected. Company property may only be used for company purposes. Exceptions, such as the authorised private use of company vehicles that are also provided for private use, must comply with legal and, in particular, tax regulations. Misuse for inappropriate, illegal or other unauthorised purposes will not be tolerated.



Company property may only be used for company purposes.

# WE PROTECT DATA PRIVACY, CONFIDENTIALITY AND BUSINESS SECRETS



The protection of data and the information and communication infrastructure against misuse, manipulation, disruption and spying on confidential information is becoming increasingly important. We protect our interests, in particular our ability to work, our trustworthiness and reliability for employees, business partners and customers as well as our reputation in the public eye – also and especially with regard to IT-based work and communication tools.

**We collect, process and use personal data only insofar as this is necessary for clearly defined purposes. In doing so, we ensure compliance with the applicable legal framework.**

We place high demands on the secure storage and retention of data to ensure confidentiality. Data is only transferred for legitimate reasons and with appropriate safeguards in place. In cases of doubt, we contact the data protection officer or the legal department of the Huelsenberg Group.

The success of the agricultural subgroups also depends on the confidential handling of information and data relating to strategic, technical, organisational and commercial

knowledge about the corporate group. All executive bodies, managers and employees are obliged to maintain confidentiality regarding internal matters of the agricultural subgroups that could cause damage to the subgroups in the event of disclosure. Data and information that come to our attention in the course of our business operations may only be used within the authorised framework and in accordance with the IT security guidelines.

During the term and validity of the employment contract and beyond, we do not disclose confidential information either directly or indirectly, either verbally or in writing, especially not to employees of competitors. We are aware that violations can result in far-reaching claims and possibly criminal proceedings.

We also apply this standard to our business partners and potential business partners and conclude corresponding confidentiality agreements and commissioned data processing agreements with them in accordance with our group standard.

## CLOSING WORDS

With this Code of Conduct, we document the guidelines of our group of companies, which we have concretised in particular through the following guidelines and policies:

- **House rules** ● **Fire safety regulations** ● **Human rights strategy** ● **IT security guidelines and policy**
- **IT framework works agreement** ● **Further guidelines**



## CONTACTS

- **Compliance Officer** ————— [Compliance@huelsenbergholding.de](mailto:Compliance@huelsenbergholding.de)
- **Sustainability Officer** ————— [birgit.beyer@union-agricole.de](mailto:birgit.beyer@union-agricole.de)
- **Data Protection Officer** ————— [Datenschutz@huelsenbergholding.de](mailto:Datenschutz@huelsenbergholding.de)
- **Group Information Security Officer** ————— [Security@huelsenbergholding.de](mailto:Security@huelsenbergholding.de)
- **Human Rights Officer** ————— [Menschenrechte@huelsenbergholding.de](mailto:Menschenrechte@huelsenbergholding.de)
- **QHSE-Agriculture** ————— [qhse@union-agricole.de](mailto:qhse@union-agricole.de)
- **Legal area** ————— [Legal@huelsenbergholding.de](mailto:Legal@huelsenbergholding.de)
- **Whistleblower system** ————— Huelsenberg Holding Whistleblowing System