



Supplier code of conduct Hoogwegt group

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We add vision & value.

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Introduction

The highest integrity of the Hoogwegt companies and its suppliers is essential for the continuity of our organization. In this Supplier Code of Conduct we reinforce the standards and rules that all Hoogwegt suppliers worldwide are expected to respect.

Our Supplier Code is designed to aid us and our Suppliers in making the right choice by providing guidance for appropriate business conduct and explaining the behaviors expected.

We will stress the importance of an open and transparent culture, where people feel free to speak their mind and are critical towards their environment at all disciplines and levels of the company.

In the years to come, sustainability will be an integral part of our activities. In this, we will be aligning ourselves and our supply chain with the UN sustainable development goals (SDGs) and we are also seeking out to work with partners who share our ambitions. For this reason, Hoogwegt has also become member of SDP (sustainable dairy partnership) to join forces to grow together in sustainability. Please check <https://saiplatform.org/sdp/> for more information regarding SDP.

Hoogwegt focusses on 3 important pillars, which are part of SDP topics:

1) Food safety

This is focused on food and feed safety and quality guaranteed within the products delivered to Hoogwegt.

2) Environmental impact

Environment and Co2 Emissions own process and products

3) People and communities

Labor standards, community, health & safety and business ethics.



Guidelines

We expect our suppliers and partners to be committed to the following guidelines:

1. Food safety

1.1 Legislation and certification

Businesses involved with Food and Feed must meet national safety and hygiene requirements in order to safeguard consumer and animal health. Our suppliers are also required by law to formulate a food safety plan in line with the HACCP system and to be recognized by the competent authority as a food or/and feed processor or handler. Food suppliers within our supply chain should preferably be certified under a GFSI- supported food safety program. Feed suppliers and handlers should preferably be certified according to GMP+ or equivalent certificate.

The food or feed material must comply with applicable laws and regulations in the country of destination and EU regulation or the Codex Alimentarius. If the purchaser has determined specific limits for its own needs, the strictest shall apply.

1.2 Food fraud and Food defense

In addition, the food and feed manufacturers and handlers provider must have conducted a food/feed fraud and food/feed defense risk analysis, adopted a plan and taken appropriate measures to be able to implement that plan.

1.3 Traceability

Food manufacturers and handlers must be able to trace the origins of the ingredients they use and record the destination of their products. If necessary, they must be able to recall an unsafe product within 4 hours after detection of a hazard.

1.4 Transparency and documentation

Suppliers will be open and transparent and are able to demonstrate and send supporting documents to prove that their products are safe to use, such as certificates, monitoring results and HACCP documentation.

Food manufacturers must demonstrate a commitment by the company to deliver food packaging that is safe. Certificates of conformity, or other evidence, shall be available for primary packaging to confirm that the packaging complies with applicable food safety legislation and is suitable for its intended use.

1.5 CSR Strategy

Suppliers will be open in their CSR strategy and will inform Hoogwegt about the development and status of their CSR targets. Suppliers are encouraged to be a member of SDP.



2. Environmental impact

Hoogwegt' suppliers are encouraged to participate in projects, which seeks to ensure ethical practices in the supply chain, reduce impact to environment or support workers and communities.

2.1 Energy and waste management

The supplier should measure, and where appropriate seek to reduce, the environmental impact of their business activities. In addition to complying with local laws, steps should be taken to minimize the use of energy and natural resources and to reduce the generation of waste.

2.2 Water management

The supplier should commit to sustainable use and management of water resources in all areas over which it has control; and where it can meaningfully do so, support and encourage others to do likewise.

2.3 Greenhouse Gas (GhG) emissions and regenerative agriculture

Suppliers will be open and transparent about their GhG emissions and plan to reduce GhG Emissions within their process as required by their national legislation.

2.4 Responsible sourcing

The supplier should endeavor to secure their raw materials from fully traceable sources. Furthermore, in case ingredients, such as palm oil or soy are used for fabrication of a product, the supplier needs to ensure that ingredients are **RSPO/RTRS** (Roundtable on Sustainable Palm Oil/Round Table for Responsible Soy) certified.

2.5 Deforestation and biodiversity

The supplier should ensure that while retrieving the supplied ingredients, no deforestation takes place. The supplier will seek to reduce environmental impact and protect biodiversity by taking measures within agriculture.

2.6 Animal care/ well being

The supplier should safeguard the animal's well-being within the supply chain according to local guidelines and standards.

2.7 Emergencies

The supplier must have procedures in place for handling emergencies such as fire, spills and natural disasters. Furthermore, suppliers must have suitable plans for notifying local community authorities in case of the release of hazardous materials.



3. People and communities

We expect the supplier to be a socially responsible partner, acting with integrity towards all their stakeholders and anyone else who may be affected by their activities. The supplier should also observe all applicable laws in the countries where it operates.

3.1 Labor standards

3.1.1 Child labor

The supplier should under no circumstances employ children.

3.1.2 Forced/ Bonded labor

The supplier should under no circumstances make use of forced or bonded labor. Hoogwegt does not tolerate involuntary labor of any kind and will not do business with a supplier that is involved in human trafficking.

3.1.3 Wages and hours

The supplier should offer their employees fair and reasonable employment conditions in areas as salaries, working hours, permits and leave, in accordance with applicable labor regulations and legislation. All extra work on a voluntary basis will be adequately compensated. Suppliers shall maintain a transparent and reliable system to record all working hours, wages and overtime.

3.1.4 Working conditions

The suppliers should treat their employees with dignity, respect and integrity. Hoogwegt will not tolerate that suppliers unlawfully discriminate based on race, color, religion, age, gender, national origin, pregnancy, disability or civil status. Suppliers will ban and shall not engage in or allow any form of harassment or abuse of employees.

3.1.5 Health and safety

Employees must be protected and prevented from exposure to severe health or safety hazards, which lead to risk on cause death or permanent injury or illness. Suppliers must comply with all applicable laws regarding working conditions and should at least provide the following minimum: Drinkable water, clean and accessible restrooms, fire and emergency exits, adequate and appropriate ventilation, temperatures and lighting, adequate protection measures, properly working equipment and emergency aid kits and access to emergency medical care.

The supplier should commit to providing a workplace free of harassment and abuse. They should not subject, or threaten to subject, workers to harsh or inhumane actions. This includes, but is not limited to, verbal abuse, psychological or sexual harassment, and mental or physical coercion.

Everyone should be able to have access to grievance systems without fear of reprisals against those reporting a grievance.



3.2 Community

Hoogwegt wishes to be aware of, and potentially learn from, any positive impact our suppliers are having on local communities. We encourage all suppliers and their employees to get involved in local social and environmental community charity efforts, by providing volunteer time and/or other types of support. We seek long-term partnerships with suppliers that share these philanthropic values.

3.3 Business ethics

3.3.1 Anti-bribery

Any situation that may involve a conflict of interest between business and personal interest is to be avoided. Suppliers must not engage in any acts of bribery or violate any applicable anti-bribery laws. Suppliers shall not give, offer or receive anything of value including payments, gifts or favors that could influence the collaboration. Facilitation Payments are explicitly forbidden.

All signs of corrupt behavior are to be reported immediately to Hoogwegt.

3.3.2 Money laundering -related activities

Suppliers shall not engage in, or support any form of money laundering, terrorist financing or any other financing for illegal purposes.

3.3.3 Antitrust/ competition laws

Hoogwegt is committed to achieving success through fair competition and strictly prohibits any activity that violates antitrust laws. The supplier shall operate in accordance with the principles of free enterprise and fair market competition.

3.3.4 Privacy and data protection

Suppliers must collect, store, use and retain data from Hoogwegt only for the purposes for which such data was collected. Suppliers shall only share data with those who need to know the information.

4 Inquiries and Contact Information

Hoogwegt welcomes an open and constructive dialogue with our suppliers about meeting the criteria of this supplier code of conduct. In turn, we expect our suppliers to do their utmost to address areas where they don't currently meet the criteria.

We encourage our suppliers to reach out to us and let us know how we can help them improve working conditions or minimize environmental impact within the dairy supply chain.

For any inquiries, reactions, remarks or concerns, please contact the Compliance department of Hoogwegt Group (compliance@hoogwegtgroup.com).