[COMPANY NAME]

CODE OF ETHICS

& Business Conduct

Our shared commitments to ethical, sustainable, and responsible business

Version 1.0 — Approved by the Board of Directors

Effective date: [DD Month YYYY] — Next review: [DD Month YYYY+1]

Owner: Chief Sustainability & Compliance Officer

Applies to: all entities, employees, contractors, and business partners worldwide

Table of Contents

1. Introduction & Purpose

1.1 A message from the Chief Executive Officer

At [COMPANY NAME], the way we achieve results matters as much as the results themselves. This Code of Ethics sets out the principles, behaviours, and commitments that bind every person who works for, or with, our company. It is the practical translation of our mission, our values, and our duty of care towards our employees, our customers, our suppliers, our communities, and our planet.

We have built this Code as a single, comprehensive reference. It covers environmental stewardship, human and labor rights, customer safety, business integrity, information security, and the way we engage our supply chain. For every material topic, we describe the policy that applies, the actions we take, and the indicators we use to measure progress.

If you ever see something that is not consistent with this Code, speak up. Our SpeakUp channels are available to every stakeholder, in every language we operate in, and protect those who report in good faith. Acting with integrity is everyone's job — starting with mine.

[Signature]

[CEO Name] — Chief Executive Officer

1.2 Purpose of this Code

This Code of Ethics ("the Code") establishes the minimum ethical, social, environmental, and governance standards applicable across [COMPANY NAME] and our value chain. It is designed as a single, integrated reference document that consolidates the commitments otherwise scattered across multiple policies — environmental policy, anti-bribery policy, data protection policy, supplier code, etc. By bringing these commitments together, we make it easier for every stakeholder to understand what we stand for, and we make it easier to evidence our maturity to external assessors, customers, investors, and regulators.

1.3 Scope and applicability

This Code applies, in all geographies and at all sites, to:

- All employees of [COMPANY NAME] and its majority-owned subsidiaries, regardless of role, seniority, or contract type.
- Members of the Board of Directors, executive officers, and members of all governance committees.
- Temporary workers, agency workers, interns, apprentices, and contractors performing services on our behalf.

- Suppliers, sub-contractors, distributors, agents, joint-venture partners, and any third party acting in our name or for our benefit, who shall comply with this Code or with a substantially equivalent Supplier Code of Conduct.

Where local law or regulation sets a stricter standard than this Code, the stricter standard prevails. Where this Code sets a stricter standard than local law, this Code prevails. Where local law conflicts with this Code, employees must seek guidance from the Compliance department before acting.

2. Core Values & Ethical Principles

2.1 Our values

Five values guide our decisions: integrity, respect, excellence, accountability, and sustainability. They are not slogans — they are the test we apply when business pressures collide with ethical principles. When in doubt, we choose integrity.

- **Integrity** — we tell the truth, we keep our commitments, and we never trade ethics for short-term gains.
- **Respect** — we treat every person with dignity, listen to dissent, and embrace the diversity of cultures, perspectives, and identities.
- **Excellence** — we hold ourselves to the highest professional standards in everything we deliver.
- **Accountability** — we own our decisions and their consequences, and we make our performance verifiable by third parties.
- **Sustainability** — we run our business in a way that protects the planet and contributes to thriving societies for the long term.

2.2 International standards we adhere to

We commit to align our policies and practices with the following international frameworks. Where any provision of this Code is unclear, these frameworks shall serve as the interpretive reference:

- The United Nations Universal Declaration of Human Rights.
- The eight fundamental conventions of the International Labour Organization (ILO), including freedom of association, the right to collective bargaining, the elimination of forced and compulsory labor, the abolition of child labor, and the elimination of discrimination.
- The UN Guiding Principles on Business and Human Rights (UNGPs).
- The OECD Guidelines for Multinational Enterprises.
- The Ten Principles of the United Nations Global Compact.
- The Paris Agreement on climate change and the Science Based Targets initiative (SBTi) Net-Zero Standard.
- The OECD Anti-Bribery Convention, the U.S. Foreign Corrupt Practices Act (FCPA), and the U.K. Bribery Act.
- The OECD Due Diligence Guidance for Responsible Business Conduct, including the Guidance for Responsible Mineral Supply Chains from Conflict-Affected and High-Risk Areas.
- The European Union Corporate Sustainability Reporting Directive (CSRD), the Corporate Sustainability Due Diligence Directive (CS3D), and the EU Green Deal directives.

- Generally accepted privacy and information-security standards including the EU General Data Protection Regulation (GDPR), ISO/IEC 27001, and ISO/IEC 27701.

2.3 Our top-level commitments

We make six time-bound, measurable commitments that frame the rest of this Code. Each commitment is broken down into operational targets in the relevant section.

- Achieve net-zero greenhouse-gas emissions across scopes 1, 2, and 3 by 2050 at the latest, with near-term science-based reductions of at least 42% on scopes 1 & 2 and 25% on scope 3 by 2030 (vs. baseline year [BASELINE YEAR]).
- Reach zero serious work-related accidents and zero fatalities, with a Lost-Time Injury Frequency Rate (LTIFR) below 1.0 per million hours worked by 2027.
- Maintain zero confirmed cases of corruption, child labor, forced labor, human trafficking, or significant data breaches across our operations and Tier-1 suppliers, every year.
- Train 100% of employees on this Code annually, and 100% of buyers on sustainable procurement within their first six months.
- Achieve 90% of strategic suppliers having signed our Supplier Code of Conduct, and 80% of high-risk suppliers covered by an ESG assessment, by 2027.
- Reach gender parity (45–55% of either gender) at every level of management, including the Executive Committee and the Board, by 2030.

2.4 Decision-making compass

When a decision is not explicitly covered by this Code, we apply a five-question compass before acting. If the answer to any of these questions is "no" or "unsure", we stop and seek guidance:

- Is it consistent with our values, this Code, and our other policies?
- Is it lawful in every jurisdiction concerned?
- Would I be comfortable if it were reported on the front page of a national newspaper, on social media, or to a regulator?
- Would my decision withstand the scrutiny of an internal or external auditor?
- Am I creating any harm — physical, psychological, financial, environmental, or reputational — for any stakeholder?

3. Environmental Stewardship & Climate Action

We recognise that the protection of the natural environment, the stabilisation of the climate, and the responsible use of resources are foundational to our long-term ability to operate. We treat environmental performance with the same rigour as financial performance: with documented policies, dedicated budgets, named accountabilities, board-level oversight, and externally-verified KPIs. The provisions of this section apply to every site and operation under our control. We expect our suppliers and contractors to abide by equivalent standards.

3.1 Energy consumption & greenhouse-gas emissions

We commit to align our climate strategy with the Paris Agreement's 1.5 °C trajectory. We measure, manage, and reduce greenhouse-gas (GHG) emissions across scopes 1, 2, and 3 in accordance with the GHG Protocol, and our reduction targets are validated by the Science Based Targets initiative (SBTi). We will not make use of carbon offsets to claim residual reductions before all internal abatement levers have been exhausted.

We operate an energy-management system aligned with ISO 50001 principles at all major sites. We invest in energy-efficiency programs, on-site and off-site renewables, fleet electrification, low-carbon logistics, refrigerant phase-out, and the engagement of our supply chain on scope-3 reductions. We integrate an internal carbon price into investment decisions above [€50] / tCO_2e and we conduct climate-related scenario analysis (TCFD-aligned) at least every three years.

We disclose our full GHG inventory annually, and report progress against SBTi-validated targets in our Sustainability Report and through CDP Climate. Energy and GHG performance is a standing item of the Audit & Risk Committee and is reviewed quarterly by the Executive Committee.

Qualitative objectives	Quantitative targets (KPIs)
• Build climate competence in every business unit through annual climate-fluency training of all leaders. • Embed climate criteria into capital allocation and product innovation processes. • Engage 100% of strategic suppliers (top 80% of scope-3 spend) on credible decarbonisation pathways. • Procure all electricity from renewable sources at owned sites by 2030 (RE100 commitment).	• Net-zero scopes 1+2+3 by 2050 (SBTi Net-Zero Standard). • −42% scope 1+2 and −25% scope 3 GHG emissions by 2030 (vs. [BASELINE YEAR]). • 100% renewable electricity by 2030 (interim 60% by 2027). • −15% energy intensity (MWh / € revenue) by 2027 (vs. [BASELINE YEAR]). • Internal carbon price ≥ €50 / tCO_2e applied to all capex > €1 M.

Indicator	Unit	Frequency
Scope 1 emissions	tCO_2e	Annual
Scope 2 emissions (location-based and market-based)	tCO_2e	Annual
Scope 3 emissions (15 categories)	tCO_2e	Annual
Energy consumption (total / by source)	MWh	Quarterly
Share of renewable electricity	%	Quarterly
Carbon intensity per € revenue	tCO_2e / M€	Annual
% of strategic suppliers with SBTi-validated targets	%	Annual

3.2 Water

Water is a finite, locally-stressed shared resource. We commit to conserve water, prevent water pollution, and respect the human right to safe water and sanitation in every community where we operate.

We map water risks at every operating site using the WRI Aqueduct tool. Sites located in water-stressed basins implement a site-specific water plan including consumption reduction, recycling, rainwater harvesting where appropriate, and stakeholder engagement. We monitor industrial water discharges to ensure they meet permit conditions and do not impair downstream ecosystems.

We disclose annually our total water withdrawal, water consumption, water discharge by destination, and the proportion of withdrawal that occurs in water-stressed basins. We participate in the CDP Water disclosure.

Qualitative objectives	Quantitative targets (KPIs)
• Apply the highest standards in water-stressed basins regardless of local regulation. • Engage local communities on water-shared resources where we operate. • Eliminate untreated process-water discharges from owned sites.	• −25% water withdrawal in water-stressed basins by 2030 (vs. [BASELINE YEAR]). • 100% of sites in water-stressed areas with a documented water management plan by 2027. • Zero permit-exceeding discharge events.

3.3 Biodiversity & ecosystems

We commit to a no-net-loss approach to biodiversity at our operated sites and to a net-positive impact on biodiversity by 2035. We do not operate, source, or finance activities in UNESCO World Heritage sites or IUCN protected areas categories I to IV.

We conduct biodiversity-impact assessments before any greenfield project and apply the mitigation hierarchy (avoid, minimise, restore, offset). We commit to zero deforestation in our direct operations and across the priority commodities we source (palm oil, soy, beef, cocoa, coffee, paper-based packaging, rubber). We disclose our biodiversity strategy following the Taskforce on Nature-related Financial Disclosures (TNFD) framework.

Biodiversity-related impacts and dependencies are disclosed annually in our Sustainability Report and through TNFD-aligned indicators.

Qualitative objectives	Quantitative targets (KPIs)
• Apply the mitigation hierarchy to any project with a potential biodiversity impact. • Partner with at least three credible conservation NGOs on long-term restoration projects.	• Net-positive impact on biodiversity by 2035. • Zero deforestation in direct operations and priority commodities by 2025. • 100% of sites located near sensitive ecosystems with a biodiversity action plan by 2027.

3.4 Air emissions and pollution prevention

We minimise atmospheric emissions of pollutants other than GHGs, in particular nitrogen oxides (NO_x), sulphur oxides (SO_x), particulate matter (PM2.5, PM10), volatile organic compounds (VOCs), and ozone-depleting substances (ODS). We respect the strictest applicable standards everywhere we operate.

Each site identifies its main pollutant streams, deploys best-available techniques (BAT) to abate them, and monitors emissions in continuous mode where regulation requires it. We have phased out CFCs and HCFCs in our refrigeration and HVAC equipment and are progressively replacing high-GWP HFCs with low-GWP alternatives.

Air emissions are reported annually and benchmarked against the European Pollutant Release and Transfer Register (E-PRTR) thresholds where applicable.

Qualitative objectives	Quantitative targets (KPIs)

• Apply best-available techniques (BAT) at all industrial sites. • Eliminate ozone-depleting substances from owned operations.	• −30% NO_x, SO_x, and VOC emissions by 2030 (vs. [BASELINE YEAR]). • Zero use of CFC/HCFC refrigerants by 2026. • 100% of sites with continuous emission monitoring where regulation requires it.

3.5 Materials, chemicals, and waste

We adopt a circular-economy approach: reduce, reuse, recycle, recover, and dispose only as a last resort. We minimise the use of virgin materials, eliminate hazardous substances wherever feasible, and substitute substances of very high concern (SVHCs) with safer alternatives.

We apply the chemicals-management hierarchy: elimination, substitution, engineering controls, administrative controls, then PPE. We label, store, handle, and transport hazardous substances in compliance with the Globally Harmonized System (GHS) and applicable national rules. We comply with the EU REACH and CLP regulations, including the registration of substances we manufacture or import (directly or via Only Representative), the communication of safety information to downstream users, and the substitution of SVHCs. We monitor industrial waste flows in real time and divert them from landfill and incineration.

We disclose annually our material consumption (renewable and non-renewable, recycled content), our hazardous-waste tonnage, our non-hazardous-waste tonnage by destination, and our progress on substituting SVHCs.

Qualitative objectives	Quantitative targets (KPIs)
• Apply circular-design principles in 100% of new product developments. • Engage employees through site-level waste-reduction challenges. • Substitute every identified SVHC unless no technically and economically viable alternative exists.	• +50% recycled content in our products and packaging by 2030. • Zero waste to landfill at all owned sites by 2030. • −40% hazardous-waste generation per unit produced by 2030 (vs. [BASELINE YEAR]). • 100% of REACH-registered substances communicated downstream with up-to-date SDS.

3.6 Product use, end-of-life, and circular economy

We design products and services that minimise environmental impact during their use phase and at end-of-life. We extend product lifetime, support repair, reuse, and recycling, and contribute to closing material loops.

We integrate eco-design and life-cycle assessment (LCA, ISO 14040/14044) into product development. We disclose product environmental information using recognised eco-labels and Environmental Product Declarations (EPDs) where relevant. We offer post-purchase care services, maintenance instructions, and where relevant, take-back, recommerce, or refurbishment platforms. We comply with extended-producer-responsibility (EPR) obligations everywhere they apply.

We disclose annually the share of products covered by an LCA, the share covered by a recognised eco-label, the volume of products taken back or refurbished, and the recyclability rate of our packaging.

Qualitative objectives	Quantitative targets (KPIs)
• Embed eco-design checkpoints in every stage-gate of product development. • Offer customers a clear repair, reuse, or take-back path for every product family.	• 100% of new products covered by an LCA by 2027. • 100% recyclable, reusable, or compostable packaging by 2030. • +30% of products with extended-life or refurbishment offerings by 2030.

3.7 Animal welfare

We respect the Five Domains of animal welfare (nutrition, environment, health, behaviour, mental state). We commit to phase out animal testing wherever a validated alternative exists, and to apply the 3R principles (Replace, Reduce, Refine) where animal testing remains unavoidable for regulatory or scientific reasons.

We train all employees who work with or source from animal-derived supply chains on humane treatment practices. We require a stimulating environment and positive emotional states, safe and consistent feed supply, the prevention of pain, stress, and other negative states. We maintain formal partnerships with credible animal-welfare organisations to advance and monitor our practices.

We disclose annually the volume of animal testing, the share of products covered by alternative methods, and the partnerships we maintain on animal welfare.

Qualitative objectives	Quantitative targets (KPIs)

• Replace animal testing with validated alternatives wherever scientifically possible. • Engage with at least two reputable animal-welfare NGOs on continuous improvement.	• Zero non-mandatory animal testing by 2027. • 100% of relevant employees trained annually on animal welfare.

3.8 Environmental advocacy and customer services

We use our voice and our offerings to accelerate the transition. We engage in public-policy advocacy in support of credible climate, biodiversity, and circular-economy regulation, and we ensure that any trade-association membership is consistent with this position.

We make customer-facing tools available — including carbon-footprint calculators, sustainability training, and recommerce platforms — to help our customers reduce their own footprint. We report on our trade-association memberships and review them annually for alignment with the Paris Agreement; we exit any association whose advocacy systematically conflicts with our climate position.

We publish an annual climate-advocacy review and the list of trade associations to which we contribute material funding (> €25k / year).

Qualitative objectives	Quantitative targets (KPIs)
• Use our public voice in support of ambitious sustainability regulation. • Empower customers with credible decarbonisation tools and information.	• 100% of trade associations with material funding aligned with Paris Agreement by 2026. • Customer-facing carbon-footprint or sustainability tools deployed in 100% of B2B markets by 2027.

3.9 Coverage, controls, and continuous improvement

We deploy environmental controls across all operations and continuously improve them through certified management systems.

All major sites operate under an environmental management system aligned with ISO 14001. Internal environmental audits are conducted annually; external surveillance audits are conducted in line with the certification cycle. Environmental incidents are reported within 24 hours through our HSE incident-management platform; significant incidents are escalated to the Executive Committee.

Coverage indicators are reported annually.

Qualitative objectives	Quantitative targets (KPIs)
• Roll out an integrated environmental management system to every operated site. • Continuously improve through annual internal and external audits.	• 100% of operated sites with ISO 14001 (or equivalent) by 2027. • 100% of significant environmental incidents reported within 24 hours. • ≥ 95% on-time closure rate for environmental audit findings.

4. Human Rights & Labor Practices

We respect human rights as defined in the Universal Declaration of Human Rights and we apply the labor standards set out in the eight fundamental conventions of the International Labour Organization. The provisions of this section apply across our operations, our subsidiaries, our suppliers, and any business partner acting on our behalf. We expect equivalent standards from our entire value chain and we conduct human-rights due diligence in line with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines.

4.1 Health, safety, and well-being at work

Every person who works for or on behalf of [COMPANY NAME] has the right to return home safely. We commit to zero serious work-related accidents and zero fatalities. Employee mental health is treated as a first-class component of occupational health.

We operate an occupational-health-and-safety management system aligned with ISO 45001 at every site. Each site conducts an annual H&S risk assessment, deploys a hierarchy-of-controls approach, runs emergency-preparedness drills, and provides personal protective equipment free of charge. Every employee receives mandatory H&S induction and annual refresher training. We prohibit retaliation against any worker who refuses to perform unsafe work. Mental-health support, including an Employee Assistance Programme (EAP), is available 24/7 in every country where we operate.

H&S indicators are reported monthly to site management, quarterly to the Executive Committee, and annually in our Sustainability Report. Significant incidents (LTIs, near-misses with high potential, occupational illnesses) are reported within 24 hours to the Group HSE function.

Qualitative objectives	Quantitative targets (KPIs)
• Build and maintain a safety-first culture at every level of the organisation. • Address mental-health and psychosocial risks with the same seriousness as physical risks. • Run a credible "see-something-say-something" near-miss reporting program.	• Zero work-related fatalities every year. • LTIFR (Lost-Time Injury Frequency Rate) < 1.0 per million hours worked by 2027. • 100% of operated sites covered by ISO 45001 (or equivalent) by 2027. • 100% of operated sites with annual H&S risk assessment conducted. • 100% of employees completing annual H&S training.

4.2 Working conditions, working time, and remuneration

We pay every employee a wage that meets or exceeds the legal minimum and a credible local living-wage benchmark. We respect maximum-working-time rules, paid leave, parental leave, public holidays, and the right to disconnect. We do not use precarious contractual arrangements to circumvent labor protections.

We benchmark salaries against external living-wage references such as the Anker methodology or the WageIndicator data. We provide written contracts in a language each worker understands, accurate payslips, and timely payment of wages and social contributions. We run an annual confidential employee-satisfaction survey, the results of which feed engagement action plans at each site. We provide enhanced parental leave, flexible-working arrangements, and a clear right-to-disconnect policy.

We disclose annually the share of employees paid at or above the local living wage, the gender pay gap, the employee engagement score, and the rate of voluntary turnover.

Qualitative objectives	Quantitative targets (KPIs)
• Pay every employee a credible local living wage. • Run a structured engagement program informed by an annual employee survey. • Provide flexible-working arrangements and enhanced parental leave globally.	• 100% of employees paid at or above the local living-wage benchmark by 2027. • Employee engagement score ≥ 75% by 2027. • Annual employee satisfaction survey with ≥ 80% participation. • Voluntary turnover ≤ industry median.

4.3 Social dialogue and freedom of association

We respect the right of every employee to form, join, or refrain from joining a trade union, and to bargain collectively, in accordance with ILO Conventions 87 and 98. We do not retaliate against employees for exercising these rights.

We engage in good-faith dialogue with employee representatives, formally elected employee bodies, and trade unions where they exist. Where local law restricts the right to freedom of association or collective bargaining, we offer alternative parallel mechanisms — for example employee-elected representative committees with comparable rights of consultation and information.

We disclose annually the share of employees covered by collective bargaining agreements, the share covered by formally-elected employee representatives, and the number of strikes or work stoppages.

Qualitative objectives	Quantitative targets (KPIs)
• Treat trade unions and employee representatives as legitimate dialogue partners. • Provide alternative dialogue mechanisms where freedom of association is locally restricted.	• 100% of operations with a structured social-dialogue mechanism by 2027. • ≥ 80% of employees covered by collective agreements or elected employee representatives.

4.4 Career management, learning, and development

Every employee has the right to grow at [COMPANY NAME]. We invest in skills, employability, and career mobility, and we support reskilling for jobs at risk from technology or business-model change.

Every employee is entitled to an annual career-development conversation, an Individual Development Plan, and access to a learning catalogue covering technical, leadership, language, sustainability, ethics, and digital-literacy skills. We commit to internal mobility-first hiring for managerial roles and we publish all internal openings.

We disclose annually the average training hours per employee, the training spend per employee, the percentage of internal mobility, and the share of employees with a documented development plan.

Qualitative objectives	Quantitative targets (KPIs)
• Make career development a manager-led, employee-driven process. • Anticipate skill gaps with credible workforce-planning analytics.	• ≥ 30 hours of training per employee per year by 2027. • ≥ 50% of managerial vacancies filled internally. • 100% of employees with an annual development conversation.

4.5 Diversity, equity, inclusion, and prevention of discrimination & harassment

We do not tolerate discrimination, harassment, sexual harassment, bullying, or violence in any form. Every employee, candidate, customer, supplier, and visitor must be treated with dignity, regardless of age, ancestry, citizenship, civil status, colour, disability, ethnic origin, family status, gender identity or expression, genetic information, marital status, national origin, parental status, political opinion, pregnancy, race, religion or belief, sex, sexual orientation, social origin, trade-union membership, veteran status, or any other characteristic protected by law.

We deploy a comprehensive program covering: structured non-discriminatory recruitment, bias-aware promotion processes, equal-pay-for-equal-work practices, Employee Resource Groups open to all, reasonable accommodation for employees with disabilities, equal-opportunity programs, mandatory anti-harassment training for every employee and every people manager, and a clearly-communicated grievance mechanism with a remediation procedure for victims.

We disclose annually the gender, age, and (where lawful and material) ethnic representation at each level of the organisation, the gender pay gap, the share of employees with disabilities, the number of harassment-related grievances opened/closed, and the time-to-resolution of those grievances.

Qualitative objectives	Quantitative targets (KPIs)
• Build a workplace where every employee can thrive without bias or fear. • Mainstream DE&I metrics into management review and incentive plans. • Ensure every grievance is investigated promptly, fairly, and confidentially.	• Gender parity (45–55% women) at every management level by 2030, including the Executive Committee. • Adjusted gender pay gap < 1% by 2027. • 100% of employees and managers completing anti-harassment training every 12 months. • ≥ 6% of workforce with disabilities by 2030. • 100% of harassment grievances investigated within 30 days.

4.6 Prohibition of child labor, forced labor, and human trafficking

We strictly prohibit any form of child labor, forced labor, bonded labor, indentured servitude, slavery, and human trafficking, in our operations, subsidiaries, and supply chain. We respect ILO Conventions 29, 105, 138, and 182, the UK Modern Slavery Act, and equivalent national laws.

We deploy a dedicated due-diligence program: human-rights impact assessment identifying potential child-labor, forced-labor or human-trafficking risks; consultation with potentially affected groups and NGOs; mandatory training of recruiters, security staff, and operations leaders; verification of age before hiring; protective measures for young workers above the minimum age; a strict prohibition on retention of identification documents (passports, visas, work permits, etc.); rules to prevent excessive use of force and limitation of freedom of movement of employees by security forces; ongoing monitoring of internal controls; a confidential grievance mechanism; and a documented remediation procedure for any victim identified, prioritising the best interests of the worker.

We publish an annual modern-slavery statement that complies with the UK Modern Slavery Act, the Australian Modern Slavery Act, and equivalent regulation. We disclose any confirmed incident of forced or child labor and the remediation actions taken.

Qualitative objectives	Quantitative targets (KPIs)
• Maintain zero tolerance and prioritise remediation over disengagement when victims are identified. • Continuously sharpen our risk assessment with insights from NGOs and affected workers.	• Zero confirmed incidents of child labor, forced labor, or human trafficking, every year. • 100% of high-risk operations and Tier-1 suppliers covered by a forced-labor due-diligence assessment by 2026. • 100% of recruiters, HR business partners, and security leads trained annually. • Annual Modern Slavery Statement published within four months of fiscal year-end.

4.7 Migrant workers and recruitment fees

We follow the "Employer Pays Principle": no worker, including migrant workers, shall pay any fee or cost to obtain employment with [COMPANY NAME] or any of our suppliers. We respect the rights of migrant workers and we ensure they enjoy the same terms and conditions of employment as local workers performing comparable work.

We require recruitment agencies to be vetted and contractually bound to the Employer Pays Principle. Where any recruitment fee has been paid by a worker, we reimburse it without delay. Migrant workers receive employment contracts in a language they understand, free movement, retention of identification documents, and access to grievance mechanisms in their language of preference.

We disclose annually the number of migrant workers employed, the number of recruitment-fee reimbursements made, and the share of recruitment agencies audited against the Employer Pays Principle.

Qualitative objectives	Quantitative targets (KPIs)
• Apply the Employer Pays Principle without exception. • Audit recruitment intermediaries with the same rigour as suppliers.	• 100% of recruitment agencies contractually bound to the Employer Pays Principle. • 100% of any recruitment fees paid by workers reimbursed within 60 days of detection. • Zero retention of identification documents.

5. Customer Health, Safety & Product Integrity

We owe customers and end-users products and services that are safe, accurately described, and respectful of their health, their privacy, and their right to make informed choices. We design quality and safety into our products from the very first stage of development, we monitor them throughout their lifecycle, and we engage transparently when issues arise.

5.1 Designing for safety and quality

Customer health and safety is a non-negotiable design principle. We comply with every applicable product-safety regulation in the markets where we operate, and we apply the precautionary principle when scientific knowledge is incomplete.

Quality and safety are managed under a documented Quality Management System aligned with ISO 9001 (and product-specific standards such as ISO 13485, IATF 16949, ISO 22000 where applicable). Every new product undergoes a formal customer health-and-safety risk assessment before market release. We integrate safety and quality requirements into supplier selection, contracts, and audits.

We disclose annually the share of products covered by a customer health-and-safety risk assessment, the number of regulatory non-conformities, and the number of safety-related incidents.

5.2 Customer information, transparency, and labelling

Customers have the right to clear, accurate, and complete information about our products: composition, intended use, hazards, sustainability impacts, and safe disposal.

We run customer awareness programmes and provide detailed product information. We publish Safety Data Sheets (SDS) and product Environmental Product Declarations (EPDs) where applicable. We maintain an inventory and communication of products containing potentially hazardous materials, and we ensure customers are aware of the presence or absence of regulated substances such as mercury, lead, BPA, and phthalates. We assess potential adverse impacts of nanotechnologies and other emerging technologies before marketing products that contain them.

We disclose annually the share of products covered by SDS / EPD, and any complaints or recalls related to product information accuracy.

5.3 Emergency preparedness, recalls, and customer feedback

When a product or service poses a risk to customer or end-user safety, we act fast, transparently, and decisively.

We maintain a documented emergency-preparedness and response procedure including a product-recall process, regularly tested through tabletop exercises. We operate processes and facilities to collect external feedback on health-and-safety issues — customer hotlines, post-market surveillance, social-listening, and complaint registers. Every credible report is investigated within 48 hours; safety-related root causes are escalated to the Executive Committee.

We disclose annually the number of recalls initiated, the time to public notification, and the time to closure.

Qualitative objectives	Quantitative targets (KPIs)
• Embed safety into design, sourcing, manufacturing, packaging, and after-sales. • Treat every credible safety report as a priority — speed and transparency are non-negotiable. • Test our recall process at least annually, including coordination with regulators.	• 100% of new products covered by a customer H&S risk assessment before launch. • Time to public recall notification ≤ 48 hours from confirmed safety risk. • 100% of products in scope with up-to-date Safety Data Sheets (SDS) where applicable. • Annual recall-process tabletop exercise conducted at every major site. • Zero recalls resulting from negligence in design or manufacturing controls.

6. Anti-Corruption & Bribery

Corruption distorts markets, harms communities, weakens institutions, and exposes everyone involved to serious legal, financial, and reputational consequences. We have zero tolerance for any form of corruption — bribery, kickbacks, influence peddling, illegal political contributions, embezzlement, extortion, or facilitation payments — regardless of geography, business pressure, or local custom.

6.1 Anti-bribery principles

No employee, director, officer, or third party acting on our behalf may directly or indirectly offer, promise, give, request, or accept anything of value to or from any person — public official or private counterparty — for the purpose of obtaining or retaining business or any improper advantage. This prohibition includes the use of intermediaries and applies whether the recipient is a public official, a private-sector counterparty, or a relative thereof.

We comply with the most stringent anti-corruption laws applicable, including the U.S. FCPA, the U.K. Bribery Act, the French Sapin II law, and equivalent national legislation. We deploy the eight pillars of an effective anti-bribery program: (i) tone from the top and risk-based corruption risk assessment; (ii) Code of Ethics and supporting anti-bribery policies; (iii) mandatory training of every employee at induction and refresher training every two years for all employees and annually for at-risk roles; (iv) anti-corruption due-diligence on third parties (agents, distributors, joint-venture partners, M&A targets) before engagement and on a periodic refresh cycle; (v) accurate books, records, and internal accounting controls; (vi) a specific approval procedure for sensitive transactions (gifts, hospitality, sponsorships, charitable donations, political contributions, facilitation payments, dealings with public officials, M&A); (vii) audits of control procedures by Internal Audit; (viii) a confidential whistleblower procedure available to all stakeholders.

Anti-corruption performance is reviewed quarterly by the Audit & Risk Committee and reported annually in our Sustainability Report. Confirmed corruption incidents are disclosed in line with applicable transparency requirements.

6.2 Gifts, hospitality, sponsorships, and donations

Gifts and hospitality may be offered or received only when they are reasonable, infrequent, transparent, lawful, properly recorded, and never given or accepted in connection with a current or imminent business decision. Cash and cash equivalents may never be offered or accepted. Sponsorships and charitable donations must serve a legitimate purpose, must not benefit any individual, and must be approved in advance through our defined process.

We maintain a Group Gifts & Hospitality register accessible to all employees, with monetary thresholds (typically €100 / event, €250 / year per counterparty) above which prior approval from the Compliance department is required. Sponsorships, charitable donations, and political contributions are subject to a dedicated multi-level approval workflow.

6.3 Facilitation payments and political contributions

Facilitation payments — small unofficial payments to expedite routine government action — are prohibited, even where they may be considered locally tolerated. The only exception is where the safety of an employee is at imminent risk; in that case, the payment must be reported to the Compliance department immediately and accurately recorded.

Political contributions made on behalf of the Company are prohibited unless explicitly authorised by the Board of Directors, lawful in the relevant jurisdiction, and disclosed in our Sustainability Report. Personal political contributions made by employees in their own time and from their own funds remain a matter of personal choice and are not subject to this restriction.

Qualitative objectives	Quantitative targets (KPIs)
• Maintain zero tolerance for any form of corruption. • Build a strong control environment with documented procedures, training, and audit trails. • Ensure third parties operate to the same standards we set for ourselves.	• Zero confirmed corruption incidents, every year. • 100% of employees trained on anti-corruption at induction; 100% refresh every two years; annual refresh for at-risk roles. • 100% of third parties in at-risk categories covered by anti-corruption due diligence before engagement. • 100% of high-risk sites internally audited on anti-corruption controls every two years. • Anti-bribery management system aligned with ISO 37001 by 2027.

7. Fair Competition

We compete vigorously but always lawfully. We respect competition and antitrust laws everywhere we operate, and we expect our employees and partners to do the same. We do not enter into anti-competitive agreements with competitors, customers, or suppliers, and we do not abuse any position of market power.

7.1 Antitrust and anti-competitive conduct

We strictly prohibit price-fixing, bid-rigging, market-sharing or customer-allocation agreements, output restrictions, group boycotts, the exchange of competitively-sensitive information with competitors, resale-price maintenance, and any abuse of dominant position. We are vigilant in trade-association meetings, industry working groups, conferences, and informal contacts with competitors.

We provide awareness training to prevent anti-competitive practices to every commercial role, every legal role, and every senior leader. We maintain a confidential whistleblower procedure, conduct regular antitrust risk assessments, and audit our control procedures. We provide every member of a commercial team with explicit competitor-interaction guidelines covering trade-association meetings, joint industry initiatives, market intelligence collection, and benchmarking. Any contact with a competitor outside formally documented commercial agreements must be reviewed in advance by Legal.

Antitrust risk and incidents are reported quarterly to the Audit & Risk Committee. Confirmed material incidents are disclosed in our Sustainability Report and managed through Legal in coordination with regulators.

Qualitative objectives	Quantitative targets (KPIs)
• Make antitrust awareness a default reflex of every commercial decision. • Equip employees with clear, actionable rules on competitor interactions.	• Zero confirmed antitrust violations, every year. • 100% of commercial roles, legal roles, and senior leaders trained on antitrust every two years. • Annual antitrust risk assessment performed across all material business units.

8. Conflicts of Interest, Anti-Money Laundering & Trade Compliance

8.1 Conflicts of interest

A conflict of interest arises when a personal interest — financial, family, friendship, political, or otherwise — interferes, or could appear to interfere, with our objective decision-making on behalf of the Company. We must avoid actual conflicts of interest, and we must disclose any potential or perceived conflict of interest before acting.

Every employee completes a conflict-of-interest declaration at induction and at least annually thereafter. The Compliance department maintains a confidential conflicts-of-interest register and prescribes mitigation measures (disclosure, recusal, role re-allocation, additional oversight, divestment, or other) where appropriate. Examples of typical conflicts include outside employment, board memberships, financial interests in suppliers/customers/competitors, family ties with counterparties, gifts above defined thresholds, and post-employment opportunities.

We disclose annually the share of employees having completed a conflict-of-interest declaration and the share of declared conflicts subject to mitigation measures.

8.2 Anti-money laundering and counter-terrorism financing

We do not facilitate, knowingly or recklessly, money laundering or the financing of terrorism. We accept payment only from legitimate sources, in line with applicable anti-money-laundering (AML) and counter-terrorism financing (CTF) laws — including the EU AML Directives, the U.S. Bank Secrecy Act, and the FATF Recommendations.

We perform Know-Your-Counterparty checks on customers, suppliers, and other third parties, screen counterparties against international sanctions lists (EU, OFAC, UN, UK), and refuse cash payments above defined thresholds. We maintain transaction monitoring controls that flag unusual patterns, including round-tripping, third-party payments, and dealings with shell companies. Employees must escalate any suspicious activity to the Compliance department immediately.

8.3 Trade compliance, sanctions, and export controls

We comply with all applicable trade-sanctions regimes (EU, OFAC, UN, UK), export-control laws, dual-use regulations, and customs requirements.

Our trade-compliance program covers counterparty screening, end-use and end-user verification, classification of items under applicable export-control regimes (e.g., EU Dual-Use, EAR, ITAR), licensing where required, and record-keeping. We maintain a restricted-party screening of every counterparty before any transaction.

Qualitative objectives	Quantitative targets (KPIs)
• Ensure every employee can recognise and disclose conflicts of interest. • Embed AML and trade-compliance checks into every commercial transaction at risk.	• 100% of employees completing an annual conflict-of-interest declaration. • Zero confirmed money-laundering or sanctions-violation incidents, every year. • 100% of high-risk counterparties screened before transaction and re-screened annually.

9. Information Security, Data Privacy & Responsible Information Management

Information is one of our most valuable assets and one of the most sensitive responsibilities entrusted to us by employees, customers, partners, and regulators. We protect the confidentiality, integrity, and availability of information — whether ours or entrusted to us — across its entire lifecycle.

9.1 Information security

We design, deploy, and operate our information systems following the principle of "security by design and by default". We classify information according to its sensitivity, restrict access on a need-to-know basis, encrypt data in transit and at rest where appropriate, and continuously monitor for threats.

We operate an Information Security Management System aligned with ISO/IEC 27001. We deploy mandatory information-security training for every employee at induction and annually thereafter; we run targeted phishing-simulation campaigns; we maintain an incident-response plan (IRP) tested at least annually; we conduct information-security due diligence on third parties handling our data; we monitor for breaches; and we operate a 24/7 Security Operations Centre. We perform information-security risk assessments at least annually and audit our control procedures through Internal Audit and external assessors.

9.2 Data privacy and personal-data protection

We respect the right to privacy. We process personal data lawfully, fairly, and transparently. We collect only data we genuinely need, we keep it accurate and up to date, we retain it only for as long as necessary, and we protect it appropriately.

Our privacy program complies with the EU GDPR and is aligned with ISO/IEC 27701. We maintain Records of Processing Activities (RoPA), conduct Data Protection Impact Assessments (DPIA) before launching high-risk processing, and ensure cross-border transfers of personal data rely on appropriate safeguards (Standard Contractual Clauses, adequacy decisions, Binding Corporate Rules). We honour every data-subject right (access, rectification, erasure, restriction, portability, objection, automated-decision-making) within the legally required timeframe. We obtain valid consent where consent is the lawful basis, and we are transparent about every other lawful basis we rely on.

9.3 Records management and intellectual property

We maintain accurate records of our activities, retain them in line with a documented records-retention schedule, and dispose of them securely. We respect the intellectual property of others, and we protect our own through appropriate registrations, contractual provisions, and security controls.

Every employee receives training on records management. Confidential information is handled, shared, and stored according to clearly defined classification rules. We do not use software, designs, content, or trademarks without proper licence.

9.4 Reporting and metrics

We disclose annually a comprehensive set of business-ethics and information-security metrics. Information-security incidents above defined thresholds are notified to the relevant supervisory authorities within applicable timeframes (typically 72 hours under GDPR).

Qualitative objectives	Quantitative targets (KPIs)
• Treat data and information as a duty of care to those who entrusted them to us. • Maintain a security culture that survives any single point of failure or human error. • Use credible third-party certifications to demonstrate maturity.	• Zero confirmed material data breaches, every year. • ISO/IEC 27001 certification on 100% of sites handling sensitive data by 2027. • 100% of employees trained on information security and data privacy annually. • ≥ 90% phishing-simulation pass rate by 2027. • 100% of third parties handling personal or confidential data covered by an information-security due diligence. • GDPR data-subject requests answered within statutory timeframes ≥ 99%.

10. Responsible Supply Chain & Sustainable Procurement

Our suppliers and sub-contractors are extensions of our brand, our values, and our risk profile. We believe responsible procurement is one of the most powerful levers we have to drive positive impact at scale, in line with our commitments under the Corporate Sustainability Due Diligence Directive (CS3D), the OECD Guidelines, and the UN Guiding Principles on Business and Human Rights.

10.1 Supplier Code of Conduct

Every supplier must comply with our Supplier Code of Conduct, which mirrors the standards of this Code: respect for human rights, prohibition of forced and child labor, freedom of association, fair wages and working hours, occupational health and safety, environmental responsibility, anti-corruption, fair competition, data protection, and confidential whistleblowing channels.

Signing the Supplier Code of Conduct, or evidencing equivalent commitments through the supplier's own code, is a contractual prerequisite for doing business with us. We integrate social and environmental clauses into supplier contracts, including the right to audit and the right to terminate for material breach. We perform risk assessments of adverse sustainability impacts in our supply base, conduct supplier sustainability assessments (e.g., EcoVadis, SAQ), perform on-site audits where risk warrants, build supplier capabilities, and run incentive programs based on environmental and social performance. We integrate sustainable-procurement objectives into buyer performance reviews. We provide worker-voice surveys and grievance mechanisms accessible to suppliers' workers in their own language.

10.2 Supplier diversity and inclusive sourcing

We seek to grow and diversify our supplier base by actively engaging with women-owned, minority-owned, LGBTQ+-owned, veteran-owned, disability-owned, and small-and-medium-sized enterprises, as well as social-economy actors. We do not tolerate discrimination or harassment in the workforce of our suppliers.

Our supplier-diversity program applies globally and includes targeted outreach, capability-building support, and dedicated tracking. We monitor supplier-level workforce-discrimination risks through our supplier sustainability assessments and follow up on identified findings.

10.3 Conflict minerals (3TG)

We support the responsible sourcing of tin, tungsten, tantalum, and gold (3TG) — and other minerals from conflict-affected and high-risk areas — and we prohibit the financing of armed groups or human-rights abuses through our supply chains. Our policy aligns with Section 1502 of the U.S. Dodd-Frank Act, the EU Conflict Minerals Regulation, and the OECD Due Diligence Guidance for Responsible Mineral Supply Chains.

We deploy a five-step OECD-aligned due-diligence approach: (i) establish strong company management systems; (ii) identify and assess risk in the supply chain through detailed conflict-minerals risk analysis (per product or purchasing category); (iii) design and implement a strategy to respond to identified risks, including engagement with selected suppliers required to fill the Conflict Minerals Reporting Template (CMRT) or other conflict-minerals questionnaires; (iv) carry out an investigation or traceability of upstream actors such as smelters, traders, and mines through credible third-party programs (e.g., RMI's Responsible Minerals Assurance Process); (v) report annually on supply-chain due diligence. We maintain a procedure to disengage with non-responding suppliers, a confidential grievance mechanism, and formal partnerships with NGOs (such as the Enough Project, Pact, or Global Witness) to advance practices.

10.4 Palm oil and other deforestation-risk commodities

Where palm oil and palm-based derivatives, soy, beef, cocoa, coffee, paper, rubber, or other deforestation-risk commodities are used in our products, we commit to source them from sustainable, deforestation-free, and legally-compliant origins. We expect our suppliers to apply social and environmental practices consistent with this Code, including respect for indigenous peoples, free prior and informed consent (FPIC), and smallholder inclusion.

For palm oil, we commit to 100% RSPO-certified (Roundtable on Sustainable Palm Oil) sourcing — preferentially "Segregated" or "Identity Preserved". We integrate the EU Deforestation Regulation (EUDR) traceability and risk-assessment requirements for the in-scope commodities. We require supplier-level traceability to mill or first point of collection, and we deploy satellite monitoring on identified hotspots.

10.5 Carbon and the supply chain

Scope 3 emissions generally represent the largest share of our climate footprint. We commit to engage suppliers in credible decarbonisation pathways and to integrate carbon performance into procurement decisions.

We engage suppliers in climate action through dedicated programs that include carbon-data collection, supplier scoring on GHG performance, target-setting (SBTi adoption), capability building, and partnership on joint reduction initiatives. We progressively select suppliers based on GHG-emissions intensity or GHG-reduction efforts, and we partner with strategic suppliers to help them achieve emissions reductions. We work with our category managers to integrate scope-3 considerations into make-vs-buy decisions, specifications, and tendering.

10.6 REACH and supplier chemical compliance

We require our suppliers to comply with REACH and equivalent chemical-management regulation in their geographies, including registration, communication of safety information, and substitution of substances of very high concern.

We perform formal assessments of supplier progress on REACH compliance and we use these assessments as input to supplier qualification and renewal.

10.7 Reporting and KPIs

Sustainable-procurement metrics are reported annually in our Sustainability Report and quarterly to the Executive Committee. Buyer performance reviews include sustainable-procurement objectives.

Qualitative objectives	Quantitative targets (KPIs)
• Treat suppliers as long-term partners in our sustainability journey. • Mainstream sustainability into every step of the procurement lifecycle (specification, sourcing, contracting, performance management). • Use audits and corrective-action plans rather than termination as the default response.	• ≥ 90% of strategic suppliers having signed the Supplier Code of Conduct by 2027. • 100% of buyers trained on sustainable procurement within their first six months. • ≥ 80% of high-risk suppliers covered by an ESG assessment (e.g., EcoVadis) by 2027. • 100% of palm oil sourced as RSPO-certified by 2027 (Segregated or Identity Preserved preferred). • 100% of in-scope smelters audited under RMAP or equivalent for 3TG by 2027.

	• 100% of EUDR-in-scope volumes traced and assessed for deforestation risk by the regulatory deadline. • ≥ 70% of strategic suppliers committed to SBTi-aligned targets by 2030.

11. Whistleblowing & Reporting Mechanisms

Our Code only works if the people who see something can say something. Speaking up is an act of integrity, and it is protected. We commit to a culture where every stakeholder — employees, contractors, suppliers, customers, communities — can raise concerns confidentially, without fear of retaliation, and where every concern is handled fairly and decisively.

11.1 What to report

Anyone who has a reasonable belief that this Code, our supporting policies, or any applicable law has been, is being, or is about to be violated must raise their concern. This includes — but is not limited to — corruption, fraud, financial misconduct, anti-competitive practices, conflicts of interest, accounting irregularities, environmental violations, health-and-safety violations, harassment, discrimination, retaliation, modern slavery, child labor, breaches of data protection or information security, sanctions violations, and breaches of human rights.

11.2 How to report — SpeakUp channels

We provide multiple, redundant, independent channels so that every reporter can choose the one they trust:

- Direct line management — for issues that can be resolved quickly and informally.
- Local Compliance Officer or HR Business Partner — for issues requiring formal investigation.
- Group Compliance department — confidential email and phone line, available in every operating language.
- Independent third-party SpeakUp platform — operated by an external provider, available 24/7 by web and phone in every operating language, allowing anonymous reporting where local law permits.
- Reporting to a public authority — every reporter retains the right to escalate to an appropriate external authority in accordance with applicable laws (e.g., the EU Whistleblowing Directive, national labor inspectorates, financial regulators).

11.3 Confidentiality, anonymity, and data protection

We treat every report with the highest level of confidentiality. The identity of the reporter is shared on a strict need-to-know basis and only with their explicit consent — except where disclosure is legally required, in which case we inform the reporter beforehand. Anonymous reports are accepted where local law allows. Personal data collected as part of a SpeakUp investigation is processed in line with our privacy commitments.

11.4 Investigation process

Every report is acknowledged within seven (7) days. A trained, independent investigator is assigned. The investigation follows a documented protocol covering scope, timeline, evidence collection, interviews, fact-finding, conclusions, remediation, and feedback to the reporter (within three months from acknowledgement, unless the complexity of the case justifies an extension, of which the reporter is informed). The investigation respects the rights of the person concerned, including the presumption of innocence and the right to be heard.

11.5 Non-retaliation

Any form of retaliation — direct or indirect, formal or informal, including but not limited to demotion, dismissal, transfer, loss of responsibilities, hostility, ostracism, or any negative impact on remuneration or career — against a person who in good faith reports a concern, refuses to engage in misconduct, or participates in an investigation, is strictly prohibited. Retaliation is itself a violation of this Code and is sanctioned. We extend protection to people connected to the reporter (colleagues, family members) where they could be retaliated against. False accusations made in bad faith are also prohibited and may give rise to disciplinary or legal action.

11.6 Outcomes and reporting

Substantiated cases lead to remedial action proportionate to the severity of the violation, which may include training, coaching, financial recovery, contractual termination, disciplinary measures up to and including dismissal, and referral to law enforcement. We disclose annually the number of reports received, the share substantiated, the average time to closure, and the share of reporters expressing satisfaction with the process.

Qualitative objectives	Quantitative targets (KPIs)
• Make speaking up the default cultural reflex when something feels wrong. • Keep SpeakUp channels independent, confidential, multilingual, and available 24/7. • Investigate every report in an impartial, evidence-based, and timely manner.	• 100% of reports acknowledged within 7 days and closed within 90 days (extensions documented). • Zero confirmed cases of retaliation against reporters. • ≥ 80% reporter-satisfaction score on the handling of their case. • Annual external audit of the SpeakUp process by Internal Audit.

12. Roles & Responsibilities

The integrity of this Code depends on clear ownership at every level. The following matrix sets out, at a high level, who is accountable, responsible, consulted, and informed for each major dimension of the Code.

12.1 Governance bodies

- **Board of Directors.** Approves the Code, oversees its effective implementation, and reviews material breaches and trends at least annually.
- **Audit & Risk Committee.** Oversees ethics, compliance, and ESG-risk management on behalf of the Board. Reviews the SpeakUp report quarterly and the consolidated Code dashboard at least annually.
- **Sustainability Committee of the Board (or equivalent).** Oversees climate, environmental, and social commitments and progress against this Code's quantitative targets.
- **Executive Committee.** Collectively accountable for the day-to-day effectiveness of the Code; reviews the Code dashboard quarterly; approves any material exception.

12.2 Functional ownership

- **Chief Sustainability & Compliance Officer (CSCO).** Operationally accountable for the Code as a whole. Coordinates the Compliance Committee, owns the Code dashboard, and has direct reporting access to the Board.
- **General Counsel.** Owns anti-corruption, antitrust, trade-compliance, AML, and litigation aspects. Co-chairs the Compliance Committee with the CSCO.
- **Chief Human Resources Officer (CHRO).** Owns the human-rights, labor, diversity-equity-inclusion, harassment-prevention, and employee well-being commitments.
- **Chief Information Security Officer (CISO) and Data Protection Officer (DPO).** Own information security, data privacy, and incident response.
- **Chief Procurement Officer (CPO).** Owns sustainable procurement, the Supplier Code of Conduct, and supply-chain due-diligence.
- **Head of HSE / Operations.** Owns environment, health, safety, and operational compliance at site level.
- **Head of Internal Audit.** Independently audits the Code's controls, reports to the Audit & Risk Committee, and validates the design and effectiveness of the SpeakUp process.

12.3 People-leader responsibilities

Every people manager has a heightened responsibility: role-modelling the Code, ensuring their team completes mandatory training, addressing questions and concerns promptly, escalating issues to Compliance when in doubt, never retaliating against anyone who raises a concern, and integrating ethics into team rituals (objective-setting, performance reviews, talent reviews).

12.4 Every employee's responsibilities

- Read, understand, and comply with this Code and supporting policies.
- Complete all assigned training and certify annual compliance.
- Raise concerns through any of the SpeakUp channels when something does not feel right.
- Cooperate fully and honestly with any investigation.
- Treat colleagues, customers, suppliers, and communities with respect and integrity.

12.5 Sanctions for non-compliance

Non-compliance with this Code may result in disciplinary measures up to and including termination of employment, in accordance with applicable law and contractual provisions. Where non-compliance involves a third party, it may result in suspension, corrective-action plans, or termination of the relationship. Where non-compliance constitutes a criminal offence, we will cooperate fully with the relevant authorities. Disciplinary measures are applied fairly, consistently, and proportionately to the severity of the breach and the circumstances of the case.

13. Communication & Training

13.1 Communication strategy

We communicate the Code in a way that is accessible, frequent, and contextual. The Code is published in every operating language on our intranet and on our public website. The launch of any new version is announced by the CEO, cascaded through line management, and reinforced through internal communication campaigns. Quarterly "Ethics Moments" — short discussions led by managers — keep the Code alive in everyday team meetings.

13.2 Mandatory training program

Every employee follows a structured training pathway, regardless of role:

- At induction — mandatory Code of Ethics e-learning (typically 60–90 minutes) covering all sections, with a knowledge-check assessment.
- Annually — refresher training, updated to reflect new risks, regulatory changes, or lessons learned from internal investigations.
- By risk profile — additional in-depth training for at-risk roles: anti-corruption for sales, finance, M&A, and procurement; antitrust for commercial roles; data privacy and information security for all data handlers; sustainable procurement for buyers; H&S for operations; and harassment-prevention for all people managers.
- By function — periodic deep-dives for the Board, the Executive Committee, and senior management (typically once every two years).

13.3 Knowledge management and signposting

An online "Ethics & Compliance Centre" centralises this Code, supporting policies, e-learnings, frequently-asked questions, decision flowcharts, the SpeakUp portal, and contacts for the Compliance department. Every policy referenced in this Code links back to its source document. New employees receive a printable handbook summarising the key rules.

13.4 Annual certification

Every employee certifies in writing, on an annual basis, that they have read this Code, completed the assigned training, declared any potential conflict of interest, and committed to abide by the Code. Certification is a condition of continued employment and a standing item of performance reviews.

Qualitative objectives	Quantitative targets (KPIs)

• Make Code training engaging, contextual, and grounded in real dilemmas. • Reach 100% of employees, contractors, and people managers — without exception.	• 100% of employees completing Code e-learning and annual certification. • 100% of new hires completing Code training within 30 days of start. • ≥ 90% post-training knowledge-check pass rate on first attempt. • Mandatory refresher every 12 months for all employees and at-risk roles.

14. Versioning & Approval

14.1 Document control

This Code is the authoritative reference. It supersedes any prior version of the Code of Ethics, the Code of Conduct, or equivalent documents previously in force. Where supporting policies exist (Anti-Bribery Policy, Data Protection Policy, Supplier Code of Conduct, etc.), they elaborate on this Code but cannot derogate from it.

14.2 Review cycle

The Code is reviewed at least annually by the Chief Sustainability & Compliance Officer in consultation with the Compliance Committee, and approved by the Board of Directors on recommendation of the Audit & Risk Committee. Material updates may also be triggered by changes in regulation, business model, or risk profile, and by recommendations arising from internal investigations or external audits. Each version is dated, and prior versions are archived.

14.3 Version history

Version	Date	Summary of changes	Approved by
1.0	[DD Month YYYY]	Initial publication of the consolidated Code of Ethics, integrating environmental, social, ethics, and procurement commitments under the Policy — Action — Reporting framework.	Board of Directors
[ ]	[ ]	[ ]	[ ]

14.4 Approval and signatures

This Code of Ethics has been adopted by the Board of Directors of [COMPANY NAME] on [DD Month YYYY] on recommendation of the Audit & Risk Committee. It enters into force on [Effective date].

Chair of the Board of Directors	**Chief Executive Officer**
Name: ____________________________	Name: ____________________________
Title: ____________________________	Title: ____________________________

Date: ____________________________ Signature: ________________________	Date: ____________________________ Signature: ________________________
Chief Sustainability & Compliance Officer Name: ____________________________ Title: ____________________________ Date: ____________________________ Signature: ________________________	**Chair of the Audit & Risk Committee** Name: ____________________________ Title: ____________________________ Date: ____________________________ Signature: ________________________

14.5 Contact

Questions about this Code, its application, or any of the supporting policies should be directed to the Group Compliance department: ethics@[COMPANY-DOMAIN] — or via the SpeakUp portal at speakup.[COMPANY-DOMAIN]. Reports may also be made to a local Compliance Officer or HR Business Partner.