

CODE OF CONDUCT

Version 1/2018



Dear Colleagues,

We are convinced that holistic, sustainable thinking and acting is an integral part of our entrepreneurial responsibility and the prerequisite of value creating growth. Therefore, part of our longterm group stratgey is to continuously improve our standards in the areas of ethics, labour, health and safety and environment together with our business partners.

In respect to botanicals, roots stand for durability and longevity. As a leading group of companies for products and services related to botanicals we see our roots in our values. They derive from a traditional, familiar environment and we, as a meanwhile worldwide operating family business in its fourth generation, still gain our strength from them.

"People make the difference" – This is an important part of our philosophy at the nature network[®]. Our way of working among each other and with business partners is based on mutual trust and we seek to be respectful, fair and reliable. We treat nature and its resources responsibly and give back to society throughout our value chain.

Each of the affiliated companies of the nature network[®] has adopted and supports this Code of Conduct. It consolidates applicable statutory and operational rules and regulations which we expect us all to comply with. Furthermore it helps us implement our principles and sets the basic guideline for our behaviour towards colleagues, business partners and the public.

We recognize that reaching these standards is a continuous process and that it requires steady improvement. At the same time intentional violations may result in disciplinary action up to legal proceedings. Even the negligent infringement may damage our business or be harmful to our appearance in the public. In case of any doubts as to a proper behavior, the superior, management or the compliance manager should be contacted to protect both personal reputation and the company's integrity.

Thank you for contributing an important part to the success of our company! We very much appreciate the great collaboration of our team!

Adolf Wedel Managing Partner

A. Wedel-Klein

Anne Wedel-Klein Corporate Sustainability

MB-Holding GmbH & Co. KG representing all affiliates of its business divisions Martin Bauer Group, Finzelberg, PhytoLab and Europlant Group



Our Code of Conduct is based on the following principles:

- International Bill of Human Rights
- UN Convention on the Rights of the Child
- OECD Guidelines for Multinational Enterprises
- International Labour Organization (ILO) Conventions

Ethics

- **Compliance with Laws** We comply with applicable laws and regulations and act in line with fair competition. We also respect the recognized standards of the different cultures in the countries in which we do business.
- Business Integrity We do not practice or tolerate in any form whatsoever- bribery, corruption, extortion or embezzlement and do not offer or accept, grant or demand any form of improper benefit, gift, hospitality, payment or other unlawful incentives in connection with our business activities. Each of our employees is required to avoid the appearance of a conflict between his or her personal interests and professional responsibility.
- Social Responsibility We act responsible to society. Without expecting any business profit in return we therefore contribute to and promote in various manners projects in the areas of education, sports and culture in a transparent way and on a voluntary basis.
- Dealing with our Company's Assets We protect, safeguard and ensure the appropriate and efficient use of our company's assets and resources, which include facilities

and machinery, property and inventory, IT-infrastructure and other equipment, as well as software, confidential and proprietary information, recipes and formulas as well as data relating to employees and business partners. We collect, store, process and share such data in strict compliance with the applicable laws on data protection.

- Audits A considerable part of our operations is subject to audits by government authorities that regulate our business. In addition, with some customers we have agreed individually to a right of inspection of our facilities and records. While carefully protecting confidential customer data, we courteously and truthfully cooperate with governmental inspections and customer audits.
- Identification of Concerns In the event of good faith concerns as to the proper adherence to the Code of Conduct or potentially unlawful activities an employee or third party may contact his superior, management or the compliance manager to report such concerns. Such event will be treated highly confidential and the reporting employee will not have to worry about any form of retaliation against him.



Labour

- Fair treatment and Inclusion We treat one another equally, fairly and respectfully and welcome the diversity and uniqueness of each employee and business partner. We do not practice or tolerate any discriminatory behavior, abuse or harassment vis-à-vis or in relation to an employee regardless of race, skin color, national or social origin, gender, age, physical characteristics, disability, political or philosophical conviction, union membership, religion, family status, pregnancy, sexual orientation or any unlawful criterion under applicable law.
- Ban on Child Labour We do not use or tolerate illegal child labour involving children under the age of fifteen.
- Working Hours, Wages and Benefits We comply with applicable labour laws, pay attention that our employees' work does not exceed the permitted maximum working hours and provide our employees with fair compensation and benefits.
- Freedom of Association We foster an open and constructive engagement with our employees and workers' representatives and respect their rights to join labour unions and workers' councils, to act as workers' representatives and to engage in collective bargaining.

Health, Safety and Quality

 Safe Work Environment - We comply with the applicable health and safety regulations and protect our employees from any kind of hazards. We maintain and keep updated all permits, licenses and registrations as well as knowhow and specific expertise required for the proper performance of our operational business. We encourage our employees to report all incidents that pose a health or safety risk and to look about the health and safety of their colleagues. To boost our employees' awareness we conduct training courses and review on a regular basis that the work conditions remain highly safe and healthy and risks are being rectified. We assess potential emergency situations at the workplace and perform the necessary safety drills.

Product Safety and Quality - It is our common understanding that the quality and safety of our products are a condition for our success. Our customers' quality requirements are of major importance to us. Therefore we ensure regulatory and safety standards as well as the high expectations in repect to our products with highest reliability. High-quality product may only be produced thoroughly and sustainably in high-quality production processes in accordance with the applicable safety standards. Therefore, we constantly improve those processes and set technological standards.

Environment

Responsibility for our Environment - We derive our
products from and build our success on the treasures of nature. To meet our own and our customers expectations we set special value on environmental protection in growing, harvesting and storing of raw materials as well as production, transportation, and distribution of our products. We therefore use energy, water, and raw materials economically and efficiently. We control and minimize waste, harmful air emissions and wastewater discharges.

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