



NovaTaste

Business Ethics

Policy

Description: Business Ethics Policy applicable to all NovaTaste entities

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Prepared: HR Leads Group **Reviewed:** Legal Counsel **Approved:** Chief Human Resources Officer

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1 Policy identification

Title: Business Ethics policy

Version: 1.0

Effective date: 01 May 2026

Review date: 01 May 2026

Policy owner: Group Human Resources

Approver: Chief Human Resources Officer

2 Scope of application

2.1 Organizational scope

NovaTaste is committed to conducting business with the highest standards of integrity, transparency, and ethical conduct. To support this commitment, NovaTaste has developed this Business Ethics Policy, which complements and expands NovaTaste's existing Code of Conduct and establishes clear expectations for ethical behavior across the organization. This policy applies to all employees, management, and board members of NovaTaste, including all subsidiaries and controlled entities.

The policy also complements the existing Supplier Code of Conduct and establishes clear ethical expectations for suppliers, contractors, agents, business partners, and other third parties engaged with the Group. By extending these standards throughout the value chain, NovaTaste ensures consistent application of ethical principles and business conduct expectations across all organizational relationships and operations.

2.2 Content scope

This policy covers topics related to:

- Corruption
- Money Laundering
- Bribery and fraud
- Anticompetitive practices and conflict of interest
- Responsible information management

3 Commitments

3.1 Corruption

Corruption represents a serious breach of business ethics and integrity, encompassing the abuse of entrusted power or position for private gain. Corruption encompasses various forms of wrongdoing including bribery (offering or accepting improper payments or advantages), embezzlement and theft, fraud and extortion, abuse of discretion and conflicts of interest, favoritism, nepotism and clientelism, and abuse of privileged information.

NovaTaste commits to zero tolerance towards corruption and bribery in any form and has implemented robust anti-corruption controls and training programs to prevent unethical practices. In general, employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of the Company. All potential or actual conflicts of interest must be disclosed to your manager or the appropriate compliance function.

To ensure accountability and demonstrate commitment to preventing corruption, NovaTaste has established the following target:

- Achieve 100% completion rate of mandatory ethics and anti-corruption training for all employees during each training cycle in 2027

3.2 Money laundering

Money laundering is the process through which the proceeds of crime are processed and converted into assets that appear to have a legitimate origin. In many jurisdictions it is an offence to process, acquire, use or possess the proceeds of crime where you know or suspect you are dealing with criminal proceeds. It is also an offence to knowingly get involved in arrangements which help someone else acquire the proceeds of crime.

NovaTaste commits to zero tolerance towards money laundering in any form and has implemented robust anti-money-laundering controls to ensure the company does not knowingly facilitate the processing of criminal proceeds.

Money laundering typically occurs in three stages: placement, where illegal profits are introduced into the financial system; layering, where funds are moved through a series of conversions to distance them from their source; and integration, where funds re-enter the legitimate economy.

NovaTaste requires vigilance from all employees to identify suspicious activities. Suspicion requires a degree of satisfaction extending beyond speculation, and this is a low threshold to satisfy. Factors that may trigger concerns include difficulty in determining the source of funds, overly complex or opaque legal structures, transactions that appear to have no purpose or lack commercial rationale, secretive or deceptive counterparties, receipt of unexpected payments from third parties, and offers of payment in cash. Everyone has a responsibility to be alive to suspicious activities and must be vigilant to ensure that they do not facilitate money laundering either by customers, suppliers or third parties.

3.2.1 Due diligence

NovaTaste applies customer and supplier due diligence (CDD) on all new customers and suppliers using a risk-based approach. CDD includes identifying and verifying the identity of customers and suppliers on the basis of documents, data or information from a reliable and independent source, identifying beneficial owners and taking adequate measures to verify their identity, establishing the purpose and nature of the business relationship, and identifying and verifying individuals acting on behalf of potential customers or suppliers. Ongoing monitoring of the relationship is conducted to detect unusual or suspicious transactions. CDD must be completed prior to establishing a new customer or supplier relationship, and work must not commence before CDD has been completed unless express authority has been granted by the CFO. Where due diligence cannot be applied to any customer or supplier, no relationship may be established with that party unless otherwise explicitly stated by the CFO.

3.2.2 Source of wealth and source of funds

When NovaTaste receives money from a customer or supplier, enquiries must be carried out to ensure understanding of the source of funds for any significant transaction. NovaTaste must be satisfied that the transaction is being funded via a legitimate source and that the transaction is consistent with the customer or supplier and their usual business activities.

3.2.3 Ongoing monitoring

Due diligence is an ongoing obligation throughout the course of the business relationship. Ongoing monitoring requires scrutiny of transactions to ensure they are consistent with knowledge of the customer or supplier, their business and risk profile. Employees must stay alert to any changes in the ownership structure and any high-risk factors or suspicious activity that may come to their attention. Documents, data or information used for the purpose of applying due diligence measures must be kept up to date.

3.2.4 Third party payments

Payments from any third party not related to the customer or supplier for that transaction must not be accepted unless prior approval has been obtained from the CFO.

Employees are legally required to immediately report if they find out, come to know, or suspect that a person (whether a customer, supplier or third party) might be engaged in money laundering or terrorist financing. Failure to make such report is a criminal offence and may result in a fine, termination of contract, or a prison sentence. Such findings must be reported immediately through appropriate reporting channels, or if concerns arise about the origins of funds, the CFO must be notified without delay.

To ensure accountability and demonstrate commitment to preventing money laundering, NovaTaste has established the following commitment:

- Maintain zero substantiated money laundering incidents reported annually by all entities in 2027

3.3 Bribery and fraud

Bribery is offering, promising, giving or accepting any financial or other advantage, to induce the recipient or any other person to act improperly in the performance of their functions, or to reward them for acting improperly, or where the recipient would act improperly by accepting the advantage. An advantage includes money, gifts, loans, fees, hospitality, services, discounts, the award of a contract or anything else of value. A person acts improperly where they act illegally, unethically, or contrary to an expectation of good faith or impartiality, or where they abuse a position of trust. The improper acts may be in relation to any business or professional activities, public functions, acts in the course of employment, or other activities by or on behalf of any organization of any kind. It is a criminal offence to offer, promise, give, request, or accept a bribe. Individuals found guilty can be punished for imprisonment and/or a fine depending on the situation and serious disciplinary measures will be taken.

NovaTaste commits to zero tolerance towards bribery; this includes granting, accepting or pledging payments in exchange for a personal or business-related favor.

3.3.1 Facilitation Payments

Facilitation payments are typically small, unofficial payments made to secure or expedite routine or necessary action (for example, by a government official).

NovaTaste does not make, and will not accept, facilitation payments of any kind. Employees must avoid any activity that might lead to a facilitation payment being made or accepted by NovaTaste or on its behalf, or that might suggest that such payment will be made or accepted.

3.3.2 Kickbacks

Kickbacks are typically payments made in return for a business favor or advantage. NovaTaste does not make, and will not accept, kickbacks of any kind. Employees must avoid any activity that might lead to a kickback being made or accepted by the company or on its behalf.

3.3.3 Public Officials

Dealings with public officials carry a higher risk of corruption, or the perception of corruption. "Public Officials" include anyone treated as a public official under applicable local laws, in particular: politicians and candidates for a political office, any elected or appointed officer or employee as well as any person acting in an official capacity of a government or government department/agency, or of a company owned or partially owned by a government; any elected or appointed officers or employees of public international organizations. Family members of any person listed above should also be regarded as "public officials" if interactions with them are intended to confer anything of value on, or improperly influence, a public official.

Offers or acceptance of gifts to or from government officials or representatives, or politicians or political parties, must not be made without the prior approval of the Compliance Officer.

3.3.4 Gifts, Hospitality and Expenses

This policy allows reasonable and appropriate hospitality or entertainment given to or received from third parties, for the purposes of establishing or maintaining good business relationships, improving or maintaining the company's image or reputation, or marketing or presenting the company's products

and/or services effectively. The threshold for each employee is EUR 50,00 (or equivalent in local currency) for each individual gift, hospitality or entertainment. Any potential breach of this limit requires prior written approval from an executive committee member.

The giving and accepting of gifts are allowed if the gift is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favors or benefits; is given in the company's name, not in an individual's name; does not include cash or a cash equivalent (such as gift certificates, gift cards or vouchers); is appropriate in the circumstances, taking account of the reason for the gift, its timing and value; is given openly, not secretly; and complies with any applicable local law.

Promotional gifts of low value such as branded stationery to or from existing customers, suppliers and business partners will usually be acceptable. Reimbursing a third party's reasonable expenses or accepting an offer to reimburse the company's expenses (for example, the costs of attending a business meeting) would not usually amount to bribery. However, a payment in excess of genuine and reasonable business expenses (such as the cost of an extended hotel stay) exceeding the amount stated in the paragraph above is not acceptable.

3.3.5 Working with Third Parties

NovaTaste must be certain that it only deals with third parties who are reputable and apply the same standards of business conduct as the company does and that it engages them on remuneration terms that are reasonable in relation to the services they are performing.

Employees must ensure that they do not authorize or facilitate a third party to make a bribe or other improper payments on the company's behalf or for its benefit or knowingly permit any such payment to be made. Any fee or compensation paid to a third party must be appropriate and justifiable remuneration for legitimate services provided. NovaTaste does not do business with any third party who is known, or reasonably suspected, of being paying bribes. Appropriate approval from management must be obtained before entering into an agreement with a third party who is a public official or politically exposed person.

As indicated above, appropriate and proportionate risk-based due diligence must be undertaken on any third party before engaging them. All agents, intermediaries and other third parties must be contractually obliged to comply with applicable anti-corruption laws and to have policies and procedures in place which comply with applicable laws, and the company must have a right of termination in the event of a breach. All agreements with agents and intermediaries must be in writing, and any arrangements with and any business conducted by third parties must be kept under regular review.

3.3.6 Charitable Donations

NovaTaste will not make charitable or community contributions in order to gain an improper business advantage. NovaTaste may make appropriate donations to charitable or community causes, provided that the donation is made to reputable and registered charitable organizations engaged in genuine charitable activities and is not intended to influence a particular business decision by the recipient, or otherwise to gain a commercial advantage.

No donation must be offered or made without the prior approval of the appropriate compliance function. To avoid the risk of any perception that NovaTaste might seek to influence the political process by improper or corrupt means, it does not make any contributions to political parties.

3.3.7 Record-Keeping

The company must keep financial records and have appropriate internal controls in place which will evidence the business reason for making payments to third parties. All hospitality or gifts given or received must be declared and kept in a written record, which will be subject to managerial review. All expenses claims relating to hospitality, gifts or payments to third parties must be submitted in accordance with the company's expenses policy and must record the reason for expenditure. All accounts, invoices, and other records relating to dealings with third parties including suppliers and

customers must be prepared with strict accuracy and completeness. Accounts must not be kept "off-book" to facilitate or conceal improper payments.

To ensure accountability and demonstrate commitment to preventing bribery, NovaTaste has established the following target:

- Achieve 100% completion rate of mandatory ethics and anti-bribery training for all employees during each training cycle in 2027

3.4 Anticompetitive practices and conflict of interest

NovaTaste is committed to fair competition and competes with competitors solely based on the quality and advantages of its products. Entrepreneurial actions should at no time prevent, restrict or distort competition. NovaTaste complies with all applicable antitrust and competition laws and prohibits agreements with competitors on sales conditions, prices, discounts or offers, abuse of a dominant market position, boycott of suppliers, or division or allocation of sales territories, customers or product segments. For NovaTaste, fair competition also means that information about competitors is obtained in a legal and ethical manner, for example by examining official and publicly available documents. Employees must avoid any activity that might lead to, or suggest, a breach of fair competition principles and antitrust laws.

In general, employees must avoid situations where personal interests conflict, or appear to conflict, with the interests of the company. A conflict of interest arises when personal interests and relationships impair NovaTaste's actions in the best interests of the company in any way. Examples of conflicts of interest include personal or financial relationships with a competitor, supplier or customer; business relationships with a family member or a company in which a family member has a financial interest; activities unrelated to NovaTaste during working hours or using NovaTaste resources; and consulting activities for a competitor, supplier or customer of NovaTaste. All potential or actual conflicts of interest must be disclosed immediately to management or the appropriate compliance function for clarification. Most conflicts can be resolved simply by disclosing them.

3.5 Responsible information management

NovaTaste is committed to protecting confidential information, intellectual property, and personal data in accordance with applicable laws and regulations. Responsible information management is essential to safeguarding NovaTaste's competitive advantage, maintaining stakeholder trust, and ensuring compliance with data protection requirements.

Intellectual property developed during employment at NovaTaste, including inventions, ideas and optimizations, formulas, processes and patents, copyrights, trade secrets, and know-how, is the property of NovaTaste. Personal data of employees, suppliers, customers and other business partners must be treated confidentially and in accordance with applicable data protection laws. Personal data may only be accessed, used, disclosed or forwarded to the extent necessary for the performance of duties and in compliance with applicable laws and regulations.

Accurate and complete records are particularly important for NovaTaste's financial reporting and disclosures. This includes everything created or stored at NovaTaste, from invoices to contracts, time sheets and pay slips to safety and environmental reports. Employees are responsible for storing documents correctly and completely. Internal retention periods for corporate documents do not apply if documents have been requested to be retained for actual or foreseeable litigation or investigation. Destruction of important documents or documents subject to legal retention requirements may result in liability for both the employee and NovaTaste.

NovaTaste systems, including computers, mobile devices, servers, telephones, email and Internet access, are made available to employees for business purposes. Employees are expected to protect NovaTaste systems from unauthorized access and to keep passwords secret. Resources should be used in an appropriate manner, and inappropriate activities including illegal or unethical activities, communicating threats, racist or pornographic content, or unauthorized viewing and/or copying of trade secrets are strictly prohibited.

4 Allocation of responsibility

4.1 Governance structure

NovaTaste has established a clear governance framework for the Business Ethics Policy that defines roles and responsibilities across multiple organizational levels. The Board of Directors provides strategic oversight of ethics and compliance priorities, ensuring alignment with organizational values and long-term business objectives. Executive Management is responsible for translating ethical standards into operational implementation and ensuring that ethics and compliance initiatives are aligned with business strategies across all functions and regions. The Legal Department owns the design, implementation, monitoring, and reporting of the policy, serving as the central coordinating function for policy development and organizational compliance. Managers at all levels are accountable for fostering an environment in which employees can ask questions and express concerns without fear of negative consequences, and for ensuring that their teams understand and comply with ethics and compliance requirements.

4.2 Management approach

NovaTaste integrates ethics and compliance due diligence into its policies, procedures, and operational practices to ensure systematic identification, assessment, and mitigation of ethics and compliance risks. NovaTaste's management approach encompasses regular risk assessments to identify potential vulnerabilities within its operations and business relationships, comprehensive employee training and awareness programs to build understanding of ethics and compliance standards, and active engagement with business partners to promote equivalent standards throughout the value chain. This integrated approach ensures that ethics and compliance considerations are embedded in decision-making processes and operational activities across all levels of the organization.

4.3 Responsibility

NovaTaste recognizes that effective implementation of the Business Ethics Policy requires commitment and accountability from all organizational members. All employees must ensure that they read, understand, and comply with this policy. The prevention, detection and reporting of bribery and other forms of corruption are the responsibility of all those working for NovaTaste or under its control. Employees are required to avoid any activity that might lead to, or suggest, a breach of this policy.

5 Policy review, communication and reporting channels

5.1 Review frequency and responsibility

This policy is reviewed every five years or when significant regulatory, organizational, or operational changes occur. The review is conducted to ensure alignment with evolving legal requirements, regulatory standards, and best practices in ethics and compliance management. The Ethics Committee provides sign-off on the policy review to ensure organizational alignment and commitment to ethics and compliance standards.

5.2 Communication and accessibility

To ensure widespread understanding and consistent implementation of the Ethics Policy across the organization, NovaTaste commits to a comprehensive communication and accessibility strategy. The policy is communicated to all employees through established internal communication channels and is made accessible to all NovaTaste employees. The policy is also communicated to suppliers, contractors and business partners and other stakeholders to ensure that ethical standards and business conduct expectations are consistently applied throughout the value chain.

5.3 Incident response and reporting channels

NovaTaste is committed to fostering a culture of transparency and accountability where concerns can be raised safely and without fear of retaliation. Employees who become aware, believe or suspect that

a conflict with this policy has occurred or may occur in the future can report any breach or suspected conflict through multiple channels: directly to their manager, to the Legal Department, or through NovaTaste's Whistleblowing Tool "[Speak Up](#)".

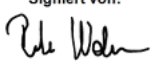
All reports will be treated confidentially and investigated fairly in accordance with company procedures. NovaTaste protects complainants, witnesses, and people involved in good faith from any form of retaliation or adverse treatment. Individuals who report misconduct or a problem in good faith need not fear negative consequences, and NovaTaste takes all reports of possible violations or misconduct seriously and will investigate all allegations.

6 Approval and signature

Title of approver: Chief Human Resources Officer

Date: 01 May 2026

Signature:

Signiert von:

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Rita Weber-Pollozhani