

# Supplier Code of Conduct



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## Preamble

As a responsible business, NovaTaste aims to fulfill the highest social and environmental standards across all our companies. As a responsible and sustainable company, we expect the same commitment from all our suppliers and that our suppliers strive to implement the same or at least comparable standards in the whole supply chain.

This Supplier Code of Conduct provides a foundational framework that reflects our commitment to integrity, sustainability and social responsibility and applies to all vendors, suppliers, contractors, consultants, agents and other providers of goods and services ("Suppliers") to the NovaTaste group of companies.

We believe that our success is linked to the values and practices of our suppliers. By complying to this Code, suppliers will contribute to a positive impact on society and the environment, ensuring that we collectively maintain a sustainable future for all of us and especially for our children. We believe that responsible business practices lead to stronger relationships, improved reputation, and long-term success. Together, we can build a supply chain that prioritizes ethical behavior, respects human dignity, and protects our planet.

We work collaboratively with our suppliers to uphold these standards and drive positive change in our industry. The principles expressed in this Supplier Code of Conduct comprise an important component of supplier selection and evaluation. Moreover, we expect our suppliers to replicate these standards further down their own supply chain to the root of the products to support and protect sustainability and good governance at the basis of our products in their first step in the supply chain, farmers in many cases.

This Supplier Code of Conduct is therefore made available to our suppliers with the goal of strengthening our mutual understanding of how these principles should be practiced in day-to-day business, but if a supplier is in breach of these principles or cannot agree on an improvement plan or does not implement it, we reserve the right to redetermine our commercial relationship, terminating any agreement or placed order without any notice and any remedy.

**„As a sustainable company, we expect our suppliers to take responsibility for food, resources and people.“**

Erik Wiberg-Lyng, CEO

# Business Ethics

Suppliers must comply with all applicable laws and regulations in the countries where they operate, including but not limited to labor laws, environmental regulations and trade laws.



## Integrity

Doing business with integrity and ethically means that we consider the impact of our activities and interactions with business partners on our reputation and finances. We strive to go beyond mere compliance with laws and regulations to do the right thing in every situation. NovaTaste only works with reputable business partners who act in compliance with all laws and regulations and have the same ethical principles as NovaTaste. To meet our Ethical principles, Suppliers shall act observing the following aspects:

### Business Integrity

Suppliers shall not offer or accept bribes or other unlawful incentives (e.g., 'facilitation payments') to or from their business partners or government officials. Suppliers shall not offer to NovaTaste employees any kind of gifts or personal benefit unless the gift is of insignificant value (e.g. supplier branded promotional items), Hospitality or Expenses may only be offered if there is a legitimate business purpose, and the costs are within reasonable limits (e.g. reasonable business lunch, entry fees to a trade fair, ...).

### Conflict of Interest

Suppliers shall disclose to NovaTaste any situation that could constitute a conflict of interest, such as any of our employees having professional, private and/or significant financial advantages or interests in any of the supplier's businesses or the direct business of the Supplier with NovaTaste or a specific transaction.

### Identification of Concerns

Suppliers shall encourage and provide means for their employees to report concerns, complaints or potentially unlawful activities in the workplace without threat of reprisal, intimidation or harassment. Any report should be treated in a confidential manner. Suppliers shall investigate such reports and take corrective action if needed. Suppliers shall notify NovaTaste of any actions that may affect their relationship with NovaTaste or potentially harm NovaTaste's reputation in any manner. Each Supplier shall implement a solution that allows concerns to be reported easily and in a language that the employees speak. Reports should also be possible in anonymous form.

If at any time a supplier or one of its employees believes that a NovaTaste employee has acted contrary to these principles, the supplier or its employee is encouraged to report concerns to our either our legal department ([legal@novataste.com](mailto:legal@novataste.com)), our compliance department ([compliance@novataste.com](mailto:compliance@novataste.com)) or on our Whistleblowing Platform to be found on our website: [www.novataste.com/SpeakUp](http://www.novataste.com/SpeakUp)

Any report made to one of these options will be handled strictly confidentially and reports on the SpeakUp Platform can also be made anonymously.

## Trade & Fair Competition

### Money laundering and terrorist financing

NovaTaste has zero tolerance to all forms of money laundering, terrorist financing and any other illegal financing. We expect the same from our business partners and that they comply with all applicable laws and regulations including but not limited to export control embargoes and sanctions against countries, companies and/or individuals especially the EU sanctions regime, the US sanctions regime (in particular the OFAC), the UK Bribery Act and the US Foreign Corrupt Practices Act. The supplier declares and warrants that neither its company nor its managers, shareholders or employees is on any applicable sanctions list, especially the EU sanctions regulations, or the US (OFAC, Office of Foreign Assets Control).

### Legal trade control

As an internationally operating group, NovaTaste supplies Know-how and products across many international borders all over the world. NovaTaste is committed to fully comply with all applicable laws where we do business, and we expect the same from our business partners.

### Fair competition

NovaTaste is committed to fair competition and competes solely based on the quality and advantages of its products. Entrepreneurial actions should at no time prevent, restrict or distort competition. No antitrust laws may be violated, and no agreements in breach of fair competition will be made between competitors in our supply base.



# Reflecting on our NovaTaste Code of Conduct

We strive to create a working atmosphere in which employees enjoy coming to work. Diversity and inclusion are part of our value system at NovaTaste - they create an open and cooperative corporate culture that thrives on tolerance, creates mutual trust and promotes the development of every employee. Our actions always comply with the highest standards of ethics, honesty and integrity, as well as all applicable laws and regulations at our locations.

## Inclusion, diversity and equal opportunities

Suppliers shall make sure to create and maintain a diverse workplace, where all employees shall be committed to an inclusive and unbiased working environment.

We expect a respectful treatment of all employees without regard to race, color, faith, religion, national origin, ancestry, age, marital status, sexual orientation or physical and/or mental limitations.

## Human rights and fair working conditions

Suppliers must comply with the International Labor Organization (ILO) core labor standards where child labour, forced labor and human trafficking is strictly prohibited. We ask all Suppliers to familiarize themselves especially with the current versions of the

- **Standards-related work of the International Labour Organization (Centenary edition 2019)**
- **Declaration on Gender Equality**
- **ILO Declaration on Social Justice for a Fair Globalization (2008), as amended in 2022**
- **ILO Declaration on Fundamental Principles and Rights at Work (1998), as amended in 2022**

Please find the link to these as part of the references at the end of this document.

## Our suppliers shall comply with the applicable labor law regulations and guidelines, in particular regarding to:

### Child Labor

We do not tolerate child labor in our supply chain. Suppliers must avoid any sort of child labor in their business operations consistent with the International Labour Organization's (ILO) core labor standards and the United Nations Global Compact principles. If local minimum age law stipulates a higher age for work or mandatory schooling, the higher age applies.

### Forced Labor and Slavery

We will not tolerate slavery or compulsory labor in our supply chain. Bonded or involuntary prison labor also is not accepted. Practices such as withholding personal property, passports, wages, training certificates, work or any other document for inappropriate reasons are not acceptable.

## We do not tolerate child labor in our supply chain

### Working Hours, Overtime, Wages and Benefits, Employment Contract

Working time for suppliers' employees shall not exceed the maximum set by the applicable national law and by ILO standards.

Overtime is recommended to be limited to 12 hours per week.

Compensation shall be paid regularly, in a timely manner and in full according to applicable laws and must comply with applicable national wage laws. Compensation and benefits should aim at providing an adequate standard of living for employees and their families. Unless otherwise provided by local laws, deductions from basic wages as a

disciplinary measure shall not be permitted (this does not exclude the entitlement of damages on a contractual or legal basis).

All employees shall be entitled to a written employment contract written in a language they understand.

### Working Conditions & Occupational Safety

Suppliers shall adequately protect their employees against chemical, biological and physical hazards. Physically demanding tasks and conditions in the workplace as well as risks associated with infrastructures used must be adequately managed to protect their employees. Suppliers shall provide appropriate controls, safe work procedures, adequate maintenance and necessary technical protective measures to mitigate health and safety risks in the workplace and to prevent accidents and occupational illnesses. In addition, suppliers shall provide employees with appropriate personal protective equipment. A safe and healthy working environment shall include as a minimum the provision of potable drinking water, adequate lighting, temperature, ventilation and sanitation.

Suppliers shall have safety programs in place for managing and maintaining all their production processes in accordance with the applicable safety standards. Programs shall be appropriate to facility and process risks. Suppliers shall appropriately communicate, disclose and manage hazards inherent in their processes and products to ensure that affected or potentially affected third parties are protected. Likewise, major incidents shall be analyzed and communicated in a timely fashion.

Suppliers must comply with product safety regulations, label products properly and communicate product-handling requirements. They shall provide to relevant parties the applicable documentation containing all necessary safety-relevant information for all hazardous substances in case of a legitimate need. This includes product information, safety data sheets, notification or registration confirmations, uses and exposure scenarios.

### Freedom of Association

in accordance with local laws, suppliers must respect the rights of their employees to associate freely, form and join labor unions, seek representation, join works councils, and engage in collective bargaining. Suppliers shall not disadvantage employees who act as workers' representatives.

# Sustainability & ESG

## working at and with NovaTaste

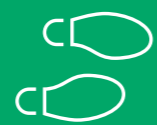
### The NovaTaste Sustainability Commitment

Sustainability is an essential part of what we do at NovaTaste. This principle begins with responsible raw material sourcing and extends through our environmentally friendly production facilities to carefully developed products and solutions that incorporate key sustainability features and innovation. We comply with all applicable laws regarding environmental protection and the handling of harmful or hazardous substances and take environmental and sustainability aspects into account in our activities and strive to minimize the adverse impact of our business activities on the environment and our local communities.

**We are committed to reduce pollution of soil and support Biodiversity throughout our supply chain and encourage our suppliers to commit themselves to the same in the supply chain down to the farmers/producers of their product.**

We strive to reduce the impact of our business on the environment as far as possible by collecting the data of our footprint in energy consumption, emissions, waste and freshwater usage and setting goals to reduce the emissions and/or consumption as far as possible and we expect from our suppliers to commit themselves to review their emissions and set goals to reduce their impact as well.

Our Environmental, Social and Governmental (ESG) strategy is anchored in the following topics:



ecological footprint



sustainable innovation



responsible sourcing



people and communities

Our projects and initiatives span our operations and value chain, with an ambition and focus on compliance, optimization & decarbonization and value creation through embedding sustainability projects in our business.

### NovaTaste: Environment and ESG Reporting

Our environmental efforts are based on calculating our carbon footprint across our entire corporate activities, scopes 1, 2 & 3, as per the GHG protocol: <https://ghgprotocol.org/companies-and-organizations>

We will comply with and report our environmental, social and governance baseline and annual performance as per the Corporate Sustainable Reporting Directive (CSRD), based on the double materiality analyses and stakeholder (external and internal) engagement and prioritization. Examples of sustainability initiatives in our global production sites include:

- ISO 14001 – many of our sites have installed this environmental management system
- SEDEX membership – all sites comply by SEDEX standards
- Scope 1 & 2 CO<sub>2</sub> reductions – optimized process controls, washing and logistics; waste reduction

### Implications to our Suppliers

Suppliers shall promote environmentally friendly practices and minimize the impact of their activities on the environment and society, including:

- Compliance with all environmental regulations in the countries where they operate
- Implementing a sustainability strategy & program with measurable projects
- Measuring baseline and yearly improvements in environmental impact as per the GHG protocol for decarbonization
- Pursuing responsible sourcing and transparency along supply chains
- Minimizing waste and emissions and promoting resource efficiency, including energy & water usage
- Using sustainable resources and renewable energy, whenever possible

### Legal milestones, ESG compliance globally 2025–2026

Requirements, cross-function for policies, process & documentation

- |  |  |  |
|--|--|--|
| <ul style="list-style-type: none"> <li>• EUDR (deforestation-free raw materials)</li> <li>• Customer Requests for ESG, standards &amp; data</li> <li>• Packaging – EPR, Circularity, Tax NEW</li> <li>• Code of Conduct, Suppliers – questionnaire, ESG projects &amp; data, audit &gt; T&amp;C</li> </ul> | <ul style="list-style-type: none"> <li>• ERM – Risks, climate related &amp; S+G risks, CSDDD</li> <li>• Responsible Sourcing TBC CoC, Human Rights Policy</li> <li>• Green Claims, Greenwashing (Mktg, Sales)</li> <li>• Circularity - Packaging &amp; Waste Regulation</li> </ul> | <ul style="list-style-type: none"> <li>• Nature restoration laws (forestry, farming)</li> <li>• CSRD (ESG Reporting)</li> <li>• EU Taxonomy, Article 8 aligned</li> <li>• Assurance -Audit ESG Data</li> <li>• CSDDD (SC due diligence)</li> </ul> |
|--|--|--|



**We look to our suppliers to set concrete targets and implement projects across the following areas aligned to responsible sourcing:**

**Climate:** Measure and reduce the product’s environmental footprint with a focus on carbon, agrochemical use, water, and biodiversity.

**Social:** Create positive impact on farmers & workers with a focus on prevention of child labour and supporting a living income

**Due Diligence:** Aim to accelerate transparency and continuous improvement in both environmental and social topics.

As an example, please see: <https://sustainablespicesinitiative.org/programs/#environmental>

# Protection of NovaTaste Assets and Interests

## Confidential Information & Intellectual Property / Brands

- **Suppliers shall safeguard** and make only appropriate use of confidential information and ensure that all employees' and business partners' privacy and intellectual property rights are protected.
- **Suppliers shall not use** NovaTaste's name or Brands or those of our affiliates or our products in publicity or advertising without our prior written consent.

## Data Privacy & Data Protection

Supplier information systems that contain NovaTaste's confidential information or data shall be appropriately managed and protected against unauthorized access, use, disclosure, modification or destruction. Confidential Information of NovaTaste shall only be shared with third parties if it is absolutely necessary for the business relation or project and only if the recipient of the Information is bound to absolute secrecy with a legally binding document. Suppliers shall collect personal information only for legitimate business purposes in the amount which is absolutely necessary for the business relation or project

with NovaTaste, use it in a legal, transparent and secure manner, share it only with those who need access, protect it in accordance with appropriate security policies, retain it only for as long as necessary, and obligate third parties with access to personal information to protect it. The Supplier confirms to comply with all applicable national and international data privacy laws, especially the European General Data Protection Regulation (GDPR).

## Product compliance and applicable regulations

NovaTaste acts in all areas in accordance with the laws and regulations applicable to the respective location, in particular with regard to the food law regulations applicable to the respective location for the control of food labeling, production and all statements that we make about our products. We expect the same from all our business partners.

## Business Continuity

NovaTaste encourages Suppliers to implement appropriate business continuity plans for operations supporting NovaTaste's business.

## Security of Delivery measures

Suppliers shall have good security practices across their supply chains. Suppliers shall assure the integrity of each shipment to NovaTaste from its origin through to its destination and shall implement appropriate measures to prevent food fraud.

## Closing

By partnering with NovaTaste, our suppliers commit to adhering to our standards. We are certain that alignment with these principles also contributes to a better partnership and a better future.

NovaTaste reserves the right to amend or modify this Code at any time and respectfully commits to engaging with Suppliers to discuss the impact of these amendments or modifications.

## Signatures

As a NovaTaste supplier you are responsible for establishing processes to monitor and record regulatory compliance. Should your adherence to our Supplier Code of Conduct be questioned, you will be expected to provide evidence of conformity to this Supplier Code of Conduct and in failure to resolve the problem, NovaTaste has the right to terminate the business relationship and any existing contracts.

### You do also understand and agree to comply with the following:

- Anti-corruption laws and regulations of countries in which Supplier is registered to do business and all countries within which Supplier conducts business.
- Trade restrictions including but not limited to sanctions and embargoes of the United States of America, the European Union and the United Nations that may be applicable to and restrict the export, re-export or importation of applicable goods and services.

### Please select one of the following statements:

**We have received the NovaTaste Supplier Code of Conduct and**

- affirm that we commit to comply with the Supplier Code of Conduct and the principles stated within.**
- confirm that we comply by virtue of the implementation of and adherence to our own Code of Conduct, which includes standards that are consistent with NovaTaste's Supplier Code of Conduct and the principles stated within.** (Please attach an electronic copy to this response form.)
- have concerns about our ability to comply with the Supplier Code of Conduct.** (Please identify which areas you have concerns with and provide detail about those concerns.)
- understand that we do not comply with the requirements of the a.m. Supplier Code of Conduct and have no plans to do so in the next 36 months.**

**„We believe that our success is linked to the values and practices of our suppliers. By complying to this Code, suppliers will contribute to a positive impact on society and the environment, ensuring that we collectively maintain a sustainable future.“**

Christoph Schamberger,  
Chief Procurement Officer

**Name of Supplier or Corporation (representing all companies doing business with the NovaTaste Group):**

**Name of Representative:**

**Legally Binding Signature/Stamp:**

**Title:**

**Date:**

# References

- // Circular Economy <https://www.ellenmacarthurfoundation.org/>
- // Convention on Biological Diversity <https://www.cbd.int/>
- // International Labour Standards (ILO) Declaration of Fundamental Principles and Rights at Work <http://www.ilo.org/public/english/standards/norm/whatare/fundam/index.htm.ilo.org>
- // OECD Guidelines for Multinational Enterprises <http://www.oecd.org>
- // United Nations Global Compact <http://www.unglobalcompact.org>
- // United Nations Guiding Principles on Business and Human Rights [https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR\\_EN.pdf](https://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf)
- // Universal Declaration on Human Rights <http://www.un.org/Overview/rights.html>
- // SSI – Sustainable Spices Initiative <https://sustainablespicesinitiative.org/programs/#environmental>
- // NovaTaste Internal Code of Conduct <https://www.novataste.com/code-of-conduct>