



Supplier Code of Business Conduct

Introduction

At Interfood, we are committed to upholding the highest standards of quality, ethics, and sustainability in every aspect of our operations. We want to conduct business the right way, we call this “doing business responsibly”. As a trusted partner in the dairy industry, we recognize that our success depends not only on the excellence of our products, but also the integrity of our practices and relationships.

This Supplier Code of Conduct outlines the principles and expectations that govern our collaboration with suppliers and business partners. It reflects our dedication to ethical business practices, compliance with applicable laws, and respect for human rights, animal welfare, environmental stewardship, climate action, and biodiversity. This Code is applicable to and must be respected by all our Suppliers and contains the minimum standards applicable to Interfood suppliers and business partners.

We believe that strong partnerships are built on shared values. By adhering to this Code, our suppliers and business partners help us ensure the consistent delivery of safe, high-quality products while contributing to a sustainable and responsible global supply chain. Together, we can foster a culture of transparency, mutual respect, and continuous improvement.

We appreciate your commitment to aligning with these standards and working with us to uphold the trust of our customers and communities worldwide.

¹ Interfood is committed to complying with the OECD guidelines and the ETI Base Code. The supplier shall read these guidelines and shall ensure compliance with it. This Code is aligned with the International Declaration of Human Rights, the ILO Declaration on Fundamental Principles, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UNGP's), ISO environmental and health guidelines, anti-bribery and competition laws, United Nations Sustainable Development Goals, and the Ten Principles of the UN Global Compact.

General

Every Interfood supplier is committed to be a responsible partner in society, acting with integrity towards its shareholders, customers, employees, suppliers and business partners, competitors, governments and other who can be affected by its activities.

Supplier duly observes the applicable rules of the law of the countries in which it operated and endeavors to adapt to local situations in order to take the most appropriate approach to possible problems within the bounds of applicable law and responsible conduct.

Suppliers are obligated to ensure that their own suppliers, subcontractors, and other partners also comply with this Code. They must take reasonable steps to identify and address risks in their supply chain.

Scope

The Interfood Supplier Code of Conduct applies to all suppliers and business partners of Interfood (in the remainder of this document referred to as 'suppliers'). Business Partners are for example subcontractors, vendors, suppliers, consultants, commercial representatives, agents and others with whom we work to serve our customers.

Ethical Business Practices

Compliance with laws and regulations

Suppliers must comply with all applicable local, national, and international laws and regulations, including those related to food safety, trade, export controls, and sustainability reporting requirements, such as CSRD where applicable. Suppliers must comply with all applicable national and international sanctions and export control laws, including EU and OFAC regulations. Suppliers may not do business with sanctioned entities or individuals and must have procedures in place to ensure compliance.

Anti-corruption and bribery

Suppliers must operate with integrity, avoiding all forms of corruption including but not limited to bribery, fraud, money laundering, extortion or embezzlement. Facilitating payments are prohibited, regardless of the amount.

Payments to third parties

No payments to providers of goods or services will be channeled through third parties; all payments made to a third party should be intended for the third party itself. Any commission payment to a third party should be justified by clear and demonstrable services rendered by that party to the Supplier. The remuneration of third parties may not exceed the normal and reasonable rates for the legitimate service rendered by the third party. A third party shall

be appointed by virtue of a contract in writing, which shall always incorporate a reference to this Interfood Supplier Code of Business Conduct.

Gifts

Personal favors and gifts should not be requested or given in circumstances that may compromise the integrity of business decisions or create the appearance of an impropriety. The acceptance or offer of gifts and favors is only allowed if in accordance with applicable laws and the above-mentioned directives on bribery and payments to third parties.

Conflict of interest

Supplier's employees are not allowed to have any direct or indirect financial interest in a supplier or competing company with the exception of a financial interest in a publicly traded company.

Fair market competition

Supplier supports the principle of free market competition. The principle of free market competition means that Supplier seeks to compete, and not collude, with its competitors. Any contact between Supplier's employees and competitors arising from the normal course of business should be fully compliant with antitrust law.

Data privacy

Suppliers must safeguard all confidential and personal data in line with applicable data protection regulations, e.g. GDPR]. Suppliers must take appropriate measures to protect this information from unauthorized access, disclosure, alteration, or destruction, in accordance with applicable data protection laws and regulations. This includes implementing secure data storage practices, restricting access to authorized personnel only, and ensuring that personal information is used solely for the purposes for which it was collected. Suppliers are required to notify our company promptly in the event of a data breach or any unauthorized access to confidential information.

Labor and human rights

Human Rights Due Diligence

Suppliers are expected to conduct ongoing HRDD to identify, prevent, mitigate and remedy adverse impacts across their operations and supply chains, in line with the UNGPs and OECD Guidelines.

No forced and child labor

Supplier shall comply with the ILO convention no 105 prohibiting all forms of forced or compulsory labor and supplier shall adhere to minimum age requirements for employment to protect children from work that could hinder their education, health or development. Under no circumstances will supplier employ children under the age of 15 and precautions must be taken to protect the health, safety and development of young workers (ILO convention 138 and 182).

Employment relationship

All workers shall have a legally recognized employment relationship. Suppliers must provide written contracts where required and ensure transparency regarding employment terms and conditions (ILO convention 122).

Freedom of association

Supplier respects the rights of employees with regard to freedom of association and collective bargaining (ILO conventions 87 and 98). You do not intimidate or harass employees in the exercise of their right to join or refrain from joining any (labour) organization.

Non-discrimination

Supplier offers equal pay for equal work performed at equal levels at similar locations (ILO convention 100). No form of harassment or discrimination in respect of employment and occupation will be tolerated, such as based on race, colour, sex, gender identity, sexual orientation, language, religion, political opinion, disability, parental status, national or social origin, property, birth or other status. (ILO convention 111).

Working conditions and social dialogue.

Supplier is responsible for a safe and healthy working environment (ILO convention 155). Good working conditions and a genuine social dialogue contribute to generate a positive and sustainable working environment.

- Wages: suppliers shall comply with applicable wage laws and abide by local minimum wages rules (ILO convention 131). When there are no local minimum wage rules available, suppliers should propose compensations and wages considering that they should meet employees' essential and basic needs.
- Working time: working time does not exceed the maximum set by local law and should not be more than 60 hours, including overtime, except in emergency or exceptional circumstances to meet short-term business demand (ILO convention 1). Employees will be allowed at least one day off per seven-day period. Overtime work shall be voluntary, unless agreed in a collective labor agreement or union contract, or, in emergency or exceptional circumstances, to meet short-term business demand.
- Workplace environment: Suppliers shall comply with applicable laws, concerning the quality of the workplace environment, and all applicable mandatory benefits provided by local and industry laws or regulations.
- Social dialogue: Suppliers shall ensure adequate labor management and regular consultation practices with employees and their representatives, and communicate any significant operational change that could substantially affect them. In particular and where applicable, they provide appropriate conditions for collective bargaining regulating relations between employers and workers.
- Suppliers shall have an effective and confidential grievance mechanism accessible to all employees and other stakeholders.

Where suppliers cause or contribute to adverse human rights impacts, they must provide or cooperate in remediation.

Health and safety

Safe working environment

Suppliers shall make sure to provide healthy and safe working conditions to their employees, in compliance with all applicable laws and regulations.

- Emergency preparedness and health and hygiene

Suppliers must provide a safe, healthy, and sanitary working environment in compliance with applicable laws. This includes identifying and mitigating hazards; supplying appropriate personal protective equipment at no cost; maintaining clean, well-ventilated, and structurally sound facilities; and offering regular safety training. Suppliers shall have documented emergency plans, clearly marked exits, accessible safety equipment, and conduct regular drills. Adequate sanitation, potable water, hygienic food preparation (where applicable), waste management, first aid, and measures to prevent communicable diseases must be in place at all times.

Environmental sustainability

Environmental Due Diligence

Suppliers are expected to identify environmental risks and to their best effort prevent, mitigate and account for identified impacts linked to their operations, products, and supply chains. This includes climate change, animal welfare, biodiversity loss, deforestation, pollution, waste, and resource use. Where suppliers cause or contribute to significant environmental harm, they are expected to provide or cooperate in remediation. Where reasonably required by Interfood, Suppliers shall provide evidence to demonstrate compliance with expectations stated in this Code.

Environmental management

Suppliers must conduct their business operations in a manner that minimizes environmental impact. All applicable national regulations regarding pollution, water use and protection, hazardous substances and other environmental topics must be complied with. Suppliers are responsible for managing, measuring and minimizing the negative environmental impacts of their facilities and supply chain.

Climate change

Suppliers must work towards measuring and reducing greenhouse gas emissions related to Supplier's their facilities and supply chain, adopting renewable energy practices, and aligning operations with the goals of the Paris agreement.

Animal welfare

Suppliers must demonstrate best efforts to ensure that animals in their supply chains are treated in accordance with internationally recognized animal welfare standards. They should

support the internationally recognized Five Freedoms for animal welfare and ensure they are observed and preserved for all animals in their value chains.

Biodiversity and deforestation

Suppliers must demonstrate best efforts to avoid deforestation and degradation of ecosystems, and protect biodiversity in sourcing and operations. Suppliers must comply with the EU Deforestation Regulation (EUDR) and be able to demonstrate that potential risks of non-compliance are actively being identified and mitigated.

Resource efficiency

Suppliers are expected to use resources such as energy, water and raw materials efficiently and responsibly. Suppliers must also continuously seek opportunities to reduce their environmental footprint by adopting innovative practices and sharing best practices within the supply chain.

Waste and pollution

Suppliers are expected to actively prevent and minimize pollution to air, water, and soil, ensuring that their operations do not cause harm to the environment or surrounding communities. All chemicals, hazardous substances, and waste materials must be properly identified, stored, handled, transported, and disposed of in compliance with applicable laws and industry best practices. Suppliers are expected to implement processes that reduce waste at the source, promote the reuse and recycling of materials, and adopt circular approaches wherever possible. Open burning, illegal dumping, or uncontrolled discharges of waste are strictly prohibited. Continuous efforts should be made to improve waste management systems, with a focus on reducing environmental impact across the lifecycle of products and services.

Compliance and monitoring

Management system

Suppliers are expected to designate a responsible person or department and maintain effective management systems to ensure compliance with this Code of Conduct, applicable laws, and contractual obligations. These systems should include clear policies and procedures that are documented, regularly updated, and applied consistently across operations. Suppliers must also provide appropriate training to employees and managers so that they understand their responsibilities, including awareness of grievance mechanisms and reporting channels.

Accurate and transparent record-keeping is essential. Suppliers should maintain documentation that demonstrates compliance—such as working hours, wages, safety performance, and environmental data—and make these records available for review upon request. Responsibility for compliance must rest with senior management, supported by monitoring processes and corrective action procedures to address any issues identified.

Suppliers are further expected to show commitment to continuous improvement by setting goals, tracking progress, and engaging stakeholders to address risks and opportunities.

In the event of non-compliance with any of the expectations stated in this Code, Suppliers shall promptly inform Interfood and cooperate in investigation, remediation and corrective action.

Audits and inspection

Interfood expects suppliers to take all necessary steps to inform its employees, agents and subcontractors of the principles set forth in the Interfood Supplier Code of Conduct and to take appropriate action to ensure understanding of and compliance with its principles. Interfood encourages suppliers to maintain necessary documentation to demonstrate compliance with the principles stipulated in this supplier code of business. Interfood has the right to audit a supplier's compliance with these principles. Where reasonably required by Interfood, supplier shall provide evidence to demonstrate compliance with expectations stated in this Code.

If areas of non-compliance are observed, the supplier will be asked to take corrective action. Interfood reserves the right to suspend or terminate the business relationship with a supplier on the basis of material breach of the principles laid down in this Supplier code of Business Conduct. Interfood shall not be liable for any costs or damages Supplier may incur consequential to such suspension or termination.

Reporting mechanisms

All suppliers and their suppliers must comply with the Interfood Supplier Code of Conduct. The supplier will inform Interfood immediately if it learns of any actual or suspected violation of the Interfood Supplier Code of Conduct to Interfood. This includes violations by any employee, agent or subcontractor.

Suppliers may report any violation of the Code of Conduct or the law through the Interfood platform. For link refer to: [SpeakUp](#)

Or use the QR code below:



All reports will be treated with strict confidentiality, and suppliers and their employees may choose to remain anonymous. Interfood strictly prohibits any form of retaliation against individuals who, in good faith, raise concerns or report suspected violations of this Code or applicable law. Interfood will provide feedback on the progress and any outcomes of an investigation within a reasonable timeframe, in accordance with internal procedures.

Suppliers are encouraged to implement their own grievance mechanisms for employees and stakeholders.

Closing

Interfood appreciates your commitment to aligning with these standards and working with us to uphold the trust of our customers and stakeholders worldwide.

By signing or accepting this Supplier Code of Business Conduct, the supplier declares to be bound by the obligations described herein and to work with Interfood diligently to make progress towards achieving the standards described herein. This may be further elaborated in an annual plan of action and attached as an Annex to this Code.

Date: _____

Signature: _____

Name (please use block letters): _____

Title: _____

Company: _____

E-mail: _____

Phone: _____

Company address: _____