



Business Partner Code of Conduct

Together for better

 **interfood**

Introduction

At Interfood, we want to conduct successful business, the right way. We call it “doing business responsibly”¹. Interfood aims to achieve excellent performance through developing mutually rewarding relationships with Business Partners. We expect Business Partners to deliver excellent service, consistently achieve our quality standards, manage business risks, mitigate costs, innovate to increase value and work in accordance with similar integrity standards. As a global company we recognize that achieving these standards presents unique challenges in different parts of the world. Business Partners are for example subcontractors, vendors, suppliers, consultants, commercial representatives, agents and others with whom we work to serve our customers.

Doing business responsibly means, amongst other things, that we all take responsibility to conduct business with high integrity. Therefore we intend to adopt and implement these, or comparable, standards and ask you and your business partners, to do the same. Interfood has recently introduced a new Code of Business Conduct. We can only achieve the goals described in that Code and realize our vision with the support of all our Business Partners.

This Business Partner Code describes what we expect from you now and in the years to come. This Code supplements other, already existing, agreements with you, our Business Partner (like our Supplier Code of Conduct).

¹ Interfood is committed to complying with the OECD guidelines and the ETI Base Code. The Supplier shall read the OECD guidelines and the ETI Base Code and shall ensure the compliance of it. This Code is aligned with the International Bill of Human Rights, The ILO Declaration on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights (UNGPs) and the Ten Principles of the UN Global Compact.



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1. You conduct your business with integrity

You act as a responsible citizen in society at all times and towards all stakeholders who may be affected by your actions.

Anti-corruption

You have a policies including a written prohibition of any and all forms of corruption, bribery, extortion and embezzlement and you have adequate procedures in place to prevent all forms of corruption in all your actions, inactions and/or commercial dealings. You do not use gifts, entertainment, expense reimbursements, commission payments, inflated payments or similar 'benefits' to influence business decisions and they are always modest and appropriate.

Gifts, hospitality and entertainment with us

Employees are discouraged to give or request personal gifts, favours or invite employees to, for example but not limited to, sports events or dinners that are disproportionate in relation to the business relationship and that may compromise the integrity of either company. Any interaction between the employees and or companies with the aim of influencing decisions on [future or existing] business is prohibited.

Official company to company gift exchanges are acceptable but must be transparent and properly recorded.

Conflicts of interest

You will declare in writing to us any conflict of interest in any business dealings with Interfood of which you or your employees are aware or become aware of. This will allow Interfood the opportunity to take appropriate action. Any ownership or beneficial interest in your business by a government official, representative of a political party or an Interfood employee is declared to Interfood in writing by you prior to any business relationship with Interfood being entered into as well as during our contractual relationship. You will avoid the [ab]use of any personal relationship with an Interfood employee to influence their judgment.

Competition and competitor information

If you obtain information about Interfood's competitors, you obtain it in a legitimate manner and will only use it for legitimate purposes in compliance with all applicable contracts, relevant competition law and other laws and regulations. You honour the principle of free market competition and avoid any illegal collusion or anti-competitive behaviour. Unless you have a legal right to do so, you do not attempt to, or reveal any confidential information of a third party to Interfood.

Safeguarding our information and property

You respect and safeguard Interfood's confidential information, know-how and intellectual property. All information provided by Interfood may only be used and shared for its intended and designated purpose. This includes any personal information about individuals, such as for example but not limited to Interfood's customers and employees. This information shall not be disclosed and is handled with full respect for and in accordance with applicable privacy laws and regulations.

Financial records, money laundering and insider trading

All business and commercial dealings are transparently performed and accurately recorded by you in your books and records. You have no actual or attempted participation in any money laundering activities.

Compliance with laws

You comply with all laws and regulations in the countries in which you operate. You also comply with applicable international laws and regulations including those relating to international trade [such as sanctions, export controls and reporting obligations].

Reporting concerns and non-retaliation

Your employees are provided with appropriate means by which they can raise their concerns about any of these requirements and all employees who speak out about an issue are protected from retaliation by you.

2. You conduct your business with due regard to your employees

Workers' health and safety are protected at work

You provide a healthy and safe workplace to prevent accidents and injury arising out of, or as a result of, your operations.

Remuneration and working hours

You pay minimum wages or above and respect employees' rights to overtime, and legally mandated benefits. Working hours are not to exceed the maximum set by law and you pay equally for equal work.

All workers are treated equally and with respect

All your employees are treated equally, with respect and dignity. No worker is subject to any physical, sexual, psychological, verbal harassment, abuse or other form of intimidation or abuse of authority. You prevent discrimination based on race, ethnicity, religion, age, gender, marital status, sexual orientation, union membership, political or other opinions, health, disability or pregnancy. You, as our Business Partner recognize the unique legal, social, and cultural situations that migrant workers face and shall ensure that such workers are treated with dignity, respect and in accordance with the same standards as apply to other workers.

Work is conducted on a voluntary basis

Forced labour is not acceptable in your organization. Mental and physical coercion, slavery and human trafficking are prohibited by you.

All workers are of an appropriate age

Under no circumstances will you employ workers under the minimum age for work or mandatory schooling as specified by applicable local laws and regulations.

All workers are free to exercise their right to form and/or join trade unions or to refrain from doing so and to bargain collectively

You recognize and respect the rights of employees with regard to freedom of association and collective bargaining. You do not intimidate or harass employees in the exercise of their right to join or refrain from joining any [labour] organization.

Employees have access to fair procedures and remedies

You provide your employees with transparent, fair and confidential procedures that result in swift, unbiased and fair resolutions of difficulties which may arise as part of their working relationship. This includes procedures which enable them to report any possible violation of this Business Partner Code to Interfood as well as any possible violation of your own internal code of conduct [if any].

3. Your conduct you business with due regard to the environment

Business is conducted in a manner which embraces sustainability and reduces environmental impact. Operations, sourcing, manufacture, distribution of products and the supply of services are conducted by you with the aim to also contribute to protect and preserve the environment, to reduce waste and energy consumption. You also help Interfood to provide its customers an insight into the environmental impact of proposed technologies and their alternatives.

4. You communicate these obligations adequately

You communicate these standards to your employees and own business partners in writing and ensure that they are followed.

How we work with our business partners

As a global company, we recognize that we have a wide and diverse range of Business Partners, and that achieving the standards described in this Business Partner Code presents unique challenges in different parts of the world, so we. With this in mind we have developed a comprehensive but flexible 3 stage process for identifying, assessing and managing progress towards these standards.

Stage 1 - Screening

We may conduct an initial screening of our current Business Partner base by considering risk, opportunity for change, and magnitude of impact, segmenting by supply category. Screening will focus on: environmental impact, practices, ethics and regulatory compliance by the Business Partner and his current programs in this area.

Stage 2 - Qualification

Business Partners may be requested to provide data and comments on those areas of concern for that specific category area, as raised in Stage 1.

Stage 3 – Audit

Business Partners whom we identify to represent the highest potential risk allow us to audit them to ensure that the minimum expectations contained within this document are being applied to their business operations and supply chains, and that risks are being mitigated.

All Business Partners and members of the supply chain must provide information to us about a product or service's social, environmental and ethical credentials. If we consider that any information provided warrants further investigation, the preferred course of action will be to commission either our own auditors or an independent auditor to examine the information provided, at the expense of the supplier or supply chain member. We reserve the right to undertake unannounced audits where we feel it is necessary.

Failure by Business Partner to adhere to this Code may lead to necessitate the execution of improvement plans or termination of the relationship. In case insufficient progress is made on an improvement plan in a timely manner, termination of the Business Partner relationship may still result without liability to Interfood.

Communication of suspected violations

Business Partner is responsible for prompt reporting to Interfood of any actual or suspected failure to comply with this Code. The same applies in case of any illegal or criminal activity that may be suspected or identified, as these could possibly impact Interfood business and/or reputation. Reports can be made via email to compliance@interfood.com.

By signing or accepting this Business Partner Code, the Business Partner 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: _____

Email: _____

Phone: _____

Company adress: _____