



**ANDROS®**

# Code of Conduct

**ANDROS German Group**



# Dear colleagues,

**We have a shared mission: to harvest – in the best sense of the word – fresh high-quality food, delivering natural treats, wellbeing and stewardship.**

As a family-run business in the food sector, it is very important to us that we operate successfully and act responsibly – for the good of our employees, the environment and society. Our aim is to provide our consumers with products that are delicious and safe. We achieve this by continuously developing our brands and driving innovation with passion and commitment.

## **Our identity – What we stand for**

Our success is based on a set of values that guide our everyday actions:

- **Employees** – We provide workplace safety and support the development of each individual.
- **Consumers** – We ensure that everyone who enjoys our products is satisfied.
- **Customers** – We serve our customers effectively and with an attractive range of products.
- **Ecology** – We treat our environment sustainably and take on social responsibility.
- **Profitability** – We improve our added value continuously and sustainably.

These principles are the key to our long-term success and handling our resources responsibly.

## **Our leadership values – What connects us**

Our values are not just buzzwords – they shape how we interact on a daily basis, the decisions we take, and our corporate culture:

- **Entrepreneurship** – We think proactively, take on responsibility and drive innovation.
- **Appreciation** – We treat each other with respect, openness and fairness.
- **Community** – We stand up for each other and work together as a strong team.
- **Joy** – We love what we do and tackle our tasks with enthusiasm.

These values are the basis for our everyday actions. They give us direction, motivate us to act together and establish a clear understanding of how to interact with one another. They are the foundation for our shared mission and our strong belief.

## **Our Code of Conduct – A shared guide**

Our Code of Conduct is binding and applies to the entire company group. This includes all associated individual companies: ANDROS Deutschland GmbH, ANDROS Ingredients GmbH, Obst- und Gemüseverarbeitung "Spreewaldkonserve" Golßen

GmbH and ODW Frischprodukte GmbH as well as ODW Lebensmittel GmbH. It helps us to bring our values to life and take the right decisions, even in challenging situations. It shows us what we can expect from each other and how we should act as a company.

Every one of us contributes to bringing our values to life and proving that they are not just words on a piece of paper. While our executives lead by example, every one of us is required to support these principles. If there are any questions or concerns, we encourage every employee to approach their manager or the relevant contact at any time.

Let us work together in making our company successful as well as sustainable, responsible and value-driven. By bringing our beliefs to life, we can build trust in the long term – with our employees, our business partners, our customers and our consumers.

Thank you for your commitment – let's embark on this journey together!

The Executive Board  
ANDROS German Group

**\* To improve readability, this Code of Conduct uses predominantly male pronouns. The decision was made to simplify this document linguistically and make it easier to read. Where applicable, the wording applies to all genders (m/f/nb). The chosen wording does not imply any type of judgement but represents an inclusive attitude towards all employees.**

# Our Declaration of Compliance

## Why does compliance matter to us?

Complying with rules and regulations should be a given – but this proves to be getting increasingly difficult in an increasingly complex business world. To ensure that we act responsibly, legally compliant and with integrity, we have developed our Compliance Programme. It helps us to adhere to key regulations and uphold corporate values, and it guarantees that we act fairly and transparently in all business areas.

## What does compliance mean to us?

To us, compliance means more than just adhering to laws. It is about taking ethical and responsible decisions, protecting our business and preserving the trust of our customers, consumers, business partners and co-workers. Our Code of Conduct serves as our guideline; it provides direction, summarizes our key principles and helps us to find the right way through challenging situations.

## What does it mean for all of us?

The Code of Conduct applies to all employees, irrespective of their function. It shows us how to act fairly and responsibly in our day-to-day business, and it gives clear advice on how to deal with business partners. If there are any uncertainties, our managers or relevant contacts are available at any time to answer questions.

With laws and business requirements constantly evolving, we regularly check and update our Code of Conduct. It cannot anticipate or cover every possible scenario but it provides reliable guidance for our everyday actions – ensuring that we remain a trusted and ethical company.





# 1 Social Responsibility & Working Standards

## **Interacting – with mutual respect, fairness and appreciation**

We are convinced that we can reach our full potential only if we work in a respectful and appreciative environment. We have committed ourselves to protect, respect and promote human rights and working standards.

### **Child labour**

Protecting children is our top priority. Child labour and any type of exploitation of minors along our value chain is strictly prohibited and will not be tolerated.

Our commitment is based on international standards, specifically on the ILO Conventions No. 138 (Minimum Age Convention) and No. 182 (Worst Forms of Child Labour Convention). Should we or any of our business partners, despite all precautionary measures, come across child labour, we will take immediate action to protect the affected child, making their wellbeing, safety and development our priority.

### **Forced labour – free will and fairness**

We object to any kind of forced, compulsory or involuntary labour. This includes debt bondage, serfdom, slavery, slavery-like practices and human trafficking. Work must always be offered voluntarily. Physical punishment or mistreatment, mental or

physical abuse, verbal harassment or assault are unacceptable in our company.

## **Working conditions and employment**

At the beginning of an employment, we provide our employees with clear and comprehensive information about their working conditions, including rights and duties, working hours, pay and payment arrangements. In addition, we ensure that every employee has the right to terminate their employment contract in compliance with applicable notice periods.

### **Working hours – fair and conforming to law**

We comply with applicable law and trade agreements regarding working hours, including regulations about overtime, breaks and holidays. The number of regular weekly working hours may not exceed the legally permissible maximum. We ensure that six consecutive workdays are followed by a day off work.

Overtime has to remain the exception and is based on legal or contractual regulations or trade agreements.

## **Pay – Fair and transparent**

We pay our employees salaries and social benefits, meeting at least the legally required minimum and complying with applicable trade agreements. In addition, we compensate for overtime and extra performance in line with legal regulations or trade agreements. Unlawful salary deductions, specifically as disciplinary measure, are not prohibited.

## **Occupational health and safety provisions – our shared interest**

The health and safety of our employees is our top priority. We provide a safe and healthy work environment and do everything possible to prevent accidents, injuries and work-related illnesses.

We comply with national and international occupational health and safety standards and carry out risk assessments on a regular basis to identify and minimize risk at an early stage. To this end, we implement appropriate protective and preventive measures, including providing personal protective gear. Regular training courses help our employees to work safely and avoid risk.

In addition to physical safety, we also care about the mental wellbeing of our employees. We guarantee appropriate working conditions, sufficient rest periods and mutually respectful interaction.

Our employees have access to clean sanitary facilities and drinking water. Accommodation we provide is safe, clean and equipped to meet the essential needs of employees.

Working under the influence of alcohol or other intoxicating substances is not permitted. We expect everyone to handle alcohol, medication or other intoxicating substances in a responsible manner and to be aware of the potential risks to themselves and others.

## **Mutual respect and protection against harassment**

Treating one another with mutual respect and appreciation is fundamental to our corporate culture. We advocate for an open, fair and inclusive work environment, making everyone feel safe and respected. We will not tolerate any behaviour that creates an intimidating or hostile work atmosphere.

Bullying, harassment or any form of intimidation or abuse, whether it be verbally, physically or mentally, has no place in our organisation and will not be tolerated. This also includes sexual harassment, meaning any unwanted behaviour of a sexual nature which a person perceives as harassment. Insults, humiliation, defamation or wilful discrimination will not be tolerated in our company.

Managers and employees are jointly responsible for creating a work environment which is defined by mutual respect, equality and appreciation.

## **Equal opportunities and diversity**

We advocate for equal opportunities, diversity and a non-discriminatory workplace. We do not tolerate any form of discrimination, whether it is based on ethnicity, nationality, social background, gender, religion, world-

view, age, disability, sexual orientation or other legally protected attributes.

Our diversity is our strength. We actively promote inclusion and create a work environment which makes everyone feel valued and offers them opportunities to grow. Decisions on hiring, pay, promotion and development are solely based on skills, performance and objective criteria. Irrelevant individual characteristics will play no part in this.

### **Freedom of association and right to collective bargaining**

We respect and honour the rights of employees to freedom of association, freedom of assembly and the formation of and membership in unions and other employee representations, in accordance with applicable national law.

We also recognize the right to collective bargaining, where legally permitted, and

maintain an open and constructive dialogue with employee representatives. In countries where collective bargaining or the collective representation of interests is restricted by law, we are committed to finding appropriate solutions to protect the interests of our employees.

### **Respecting local communities and indigenous peoples**

We act responsibly and treat local communities and indigenous peoples with respect in the regions where we operate. We respect their rights, their traditions and their customs as well as the environment and biodiversity. We do not tolerate land grab and the disregard for property rights.





# 2 Environment & Sustainability

Being a part of the food industry, we are aware of our responsibility to protect the environment and resources. We are committed to balancing economic goals with ecological responsibility – with the clear aim of preserving natural resources for present and future generations.

This is why we are actively seeking to minimize the environmental impact of our business operations throughout the entire value chain – from procurement and production to marketing our products. We achieve this by:

- Meeting and exceeding legal standards of environmental protection to reduce continuously our environmental impact
- Using raw materials, water and energy effectively to save resources and avoid waste
- Promoting sustainable cultivation methods and responsible supply chains, adhering to environmental and social standards
- Reducing emissions and taking climate-friendly actions to reduce our ecological footprint

Sustainability is a key element of our corporate strategy and defines our everyday actions. We promote dialogue between non-governmental organisations (NGOs), business partners and suppliers to set standards for environmentally conscious business practices. At the same time, we encourage our workforce to act in an environmentally and resource-friendly manner,

whether it be by using energy efficiently, imparting knowledge consistently or using sustainable methods of transport.

With continual improvements and by using advanced technologies, we are contributing actively to a sustainable and responsible future – for our company, our employees and society.

## **Preserving and promoting biodiversity**

For us, preserving biodiversity is an integral part of sustainable agriculture. We are actively committed to protecting ecosystems, avoiding monocultures and promoting natural habitats for plants and animals. We help foster biodiversity and protect nature long-term with targeted measures such as nature conservation projects on our meadows and collaborations with our business partners in the field of transformative agriculture.

## **Animal welfare and sustainable agriculture**

We are committed to not using any raw materials deriving from protected species or illegal practices, and to ensuring that animal welfare is guaranteed throughout our supply chain.

Our work is based on the principles of the Farm Animal Welfare Council (FAWC), stipulated by the World Organisation for Animal Health (WOAH, formerly OIE).

In our fruit and vegetable production, we do not tolerate the use of wild animals for cultivation or harvesting. Our agricultural partners are committed to using sustainable methods, taking into account the protection of the environment and wildlife.

### **Protecting forests and biodiversity**

We are committed to not using any raw materials deriving from illegal logging, and to ensuring that our operations do not contribute to deforestation or the reduction in biodiversity. Preserving natural ecosystems is a key element in our sustainable actions.

Therefore, we follow these principles:

- Protecting forests, moors and precious ecosystems with a high value in nature conservation
- Reducing CO<sub>2</sub> emissions by using land responsibly
- Banning slash-and-burn agriculture to prepare land

- No interfering in protected areas, and no use of endangered species, defined by the IUCN Red List of Endangered Species or CITES Convention of International Trade with Endangered Species

Prior to developing new arable land or expanding existing activities, we will conduct thorough checks on biodiversity and deforestation risks, and ensure that all necessary environmental permits are obtained.

### **Environmental protection and waste management**

Our goal is to minimize the risk of pollution at our production sites and to the environment. Handling hazardous materials, substances and chemicals responsibly is essential to us. We diligently record and document such materials and ensure that they are safely handled, stored, reused, disposed of or recycled in accordance with applicable regulations. As a minimum, our emissions comply with legal standards of environmental protection.

To reduce our environmental impact, we have taken the following measures:

- Reducing the generation of waste by regularly evaluating the impact of our production
- Maximizing recycling and reusage within existing local waste disposal systems
- Prohibiting waste disposal in nature – proper waste disposal within the applicable legal framework is mandatory
- Assessing and optimizing our waste disposal and recycling channels to minimize the impact on our environment and biodiversity
- Reducing greenhouse gas emissions





## **Water consumption and wastewater treatment**

We strive to reduce our water consumption effectively and to ensure the environmentally sound treatment of wastewater in line with local regulations by means of resource-saving measures designed to minimize the impact on the environment.

## **Energy efficiency and reduction of emissions**

We identify and analyse direct and indirect sources of energy consumption. Where technically feasible and economically viable, we strive to use renewable or low-carbon energy resources in order to reduce our CO<sub>2</sub> emissions and minimize the environmental impact. In addition, we continuously review measures to increase energy efficiency and implement them, if possible. The goal is to reduce energy consumption in the long run and use resources responsibly.



# 3 Business Leadership, Ethics & Compliance

## Anti-corruption and business integrity

Corruption undermines fair competition and impacts companies as well as society. Therefore, we do not tolerate bribery, corruption, granting of advantages or any other form of corruption in our business activities.

Offering or accepting gifts, invitations or other handouts that may influence business decisions, or appear to exert undue influence, is prohibited. Only gifts with a low value and customary in a business context are permitted, provided they are ethically justifiable and do not break any law or internal regulations.

We stand for transparent business relationships, based on integrity, and we actively oppose corruption and white-collar crime.

## Sponsorships and donations

Sponsorships help to promote our visibility and image through collaborative partnerships. Unlike donations, sponsorships are based on a service in return, such as marketing or communication measures.

All sponsorship activities are handled transparently and stipulated by contract. The services must be proportionate to the support and cannot be used in lieu of donations or to bypass internal requirements. We do not donate to political organisations, parties or individual politicians.

## Dealing with officials

Dealing with officials requires utmost prudence and restraint. Officials include civil servants, employees of government agencies, public institutions, state-owned companies and international organisations as well as members of parliament, elected officials and representatives of political parties.

Granting advantages and bribing officials are criminal offences and can be committed even with seemingly harmless gifts or favours. Therefore, any behaviour which may give the impression of attempting to exert undue influence on decisions or official acts must be avoided. Business relationships with officials must be transparent, lawful and of integrity at all times.

## Avoiding conflicts of interest

Business decisions must always be taken independently and in the best interest of the company. Conflicts of interest arise if private, financial or other personal interests influence or may influence business decisions.

Therefore, the following applies:

- Private and business interests must be kept separately
- Do not enter into a business relationship with business partners or competitors if this may lead to a conflict of interest
- Personal advantages deriving from business relationships are prohibited

- Potential conflicts of interest must be disclosed at an early stage and discussed with management

The slightest appearance of a conflict of interest can harm the company. Therefore, all employees are urged to disclose any potential conflict and act responsibly.

## **Fair competition and cartel law**

Free and fair competition is the foundation of our market economy. It promotes innovation and efficiency and provides consumers with a bigger choice. This is why we always act in line with applicable competition and cartel law, and we reject any form of anti-competitive agreements and unfair business practices.

Anti-competitive practices are prohibited, specifically:

- Collusive pricing, market or customer allocation with competitors, suppliers or retailers
- Improper exchange of information or other activities that may influence competition unlawfully
- Agreements distorting competition or restricting markets which subsequently inhibit innovation and fair trade

Our business decisions are based on performance, quality and a fair market mechanism. We respect the legal framework and ensure that we do not unlawfully hinder or favour other market players.

Any uncertainties or questions regarding competitive or cartel law should be raised with the Compliance Department at an early stage.

## **Export control, economic sanction and money laundry**

We comply with applicable trade law, including export controls, import and customs regulations as well as economic sanctions, and we meet all legal requirements to prevent money laundry.

In case of uncertainty, every employee is obliged to get in touch with the Compliance Department at an early stage to avoid violations and ensure legally compliant international business transactions.

## **Data protection and handling data responsibly**

Protecting personal data is essential to us, whether it concerns employees, customers or business partners. We handle this data responsibly and use, store or process it solely for clearly defined, legitimate and legally permissible purposes.

We are committed to transparency and make sure that everyone knows how and why data is processed. At the same time, we protect personal information with technical and organisational measures to ensure that they are safe from unauthorised access, loss or misuse.

Every one of us in the company is responsible for data protection. Anyone who handles personal data must comply with applicable law and internal regulations.

## Accounting and financial reporting

All business and financial transactions are recorded in full, truthfully and according to applicable accounting standards.

We ensure the precise recording and storage of relevant supporting documents through secure and efficient systems. We also comply with all relevant tax, customs and legal regulations. We do not tolerate incorrect or manipulative information.

## Protecting trade and business secrets

Handling trade and business secrets as well as confidential information responsibly and with care is essential. Internal data as well as information from business partners and customers may not be shared or used for own or third-party purposes.

To ensure the security of sensitive data, we take appropriate technical and organisational measures. Confidential information can be accessed by authorised persons only.

## Handling corporate assets

Everyone is responsible for handling corporate assets with care and using them solely for operational purposes. This applies to operating resources, machinery, IT systems, data, brand appearance as well as customer and business relationships. We do not tolerate theft, wilful damage, waste or unauthorised private use.

To prevent damage or loss, everyone is required to protect company resources and use them cost-effectively. The private use of corporate assets is only allowed if specifically permitted or based on internal regulations.

## Protecting the reputation of the company

The reputation of the company is shaped by the behaviour of all employees. Every one of us is responsible for protecting and strengthening the reputation of our company. Careless or inappropriate comments, especially in public and on social media, can harm the company.

It is important to not disclose any confidential information and to protect the interests of the company, when it comes to public statements such as interviews, speeches or publications. Statements about company-relevant topics can only be made by explicitly authorised persons.

The respectful and responsible conduct extends to the digital sphere. Internal information or confidential data must not be shared. Legal requirements such as privacy laws and copyrights must be observed. A sensible and prudent approach to public statements will protect the reputation of the company as well as personal reputation.

## Quality and product safety

The safety and quality of our products have top priority. We ensure that our goods comply with applicable legal requirements and meet the highest quality standards.

To minimize any potential risk, we apply systematic risk assessments throughout the entire process chain and take preventive measures to avoid health issues or incorrect labelling. We will instantly follow up and investigate any sign of quality defects or safety risks and take appropriate actions to correct them.

## IT security

Stable and secure IT operations are essential for protecting our systems and data.

Therefore, hardware and software are installed, maintained and managed solely by our IT Department or authorised service providers.

Access rights and user guidelines for our IT systems are safety-relevant, and all employees must strictly adhere to them. Handling IT resources responsibly contributes to protecting our data and safeguarding the integrity of the systems.

## Implementing and complying with the Code of Conduct

The Ethics Code gives direction to everyone on how to interact responsibly and with integrity. Everyone contributes to complying and implementing the principles set out in this code day-to-day. Managers, especially, lead by example by actively bringing our corporate values to life and supporting their teams.

If there are any uncertainties or questions regarding the Ethics Code, managers and the Compliance Department are available for an open discussion at any time. Together we will ensure that our actions are in line with our values as well as internal and legal regulations. Any violation will be transparently reviewed and, if necessary, appropriate action will be taken.

Complying with the Ethics Code is a responsibility we all share and which strengthens our company and builds trust among all involved parties.

## Reporting violations and concerns – Speak Up

Every employee has the right and the duty to report potential violations of legal rules, internal regulations or ethical principles. It is a key concern of ours to create a work environment in which everyone feels safe and able to raise concerns or questions or share observations. This right should not be taken for granted – we all need to contribute to promoting an open and trust-based corporate culture where leads are taken seriously and handled responsibly.

Everyone in the company is expressly encouraged to raise concerns or report violations – either to their manager, the Compliance Department, HR or Speak Up, our confidential and, upon request anonymous, whistleblower system.

Any information will be reviewed carefully and treated confidentially. There is no reason to fear negative consequences for reporting concerns in good faith, regardless of whether the suspicion is later confirmed. In fact, whistleblowers make an important contribution to the integrity and future viability of the company.

Any violation will be investigated promptly and, if necessary, appropriate action will be taken.

Speak Up stands for an open corporate culture, with transparency, responsibility and mutual respect at its core. Those who have the courage to notice and speak up strengthen our values and our community.



# Imprint

## Contact

Compliance Manager

E-mail: [compliance@andros.de](mailto:compliance@andros.de)

## Publisher

ANDROS Deutschland GmbH

Bahnhofstraße 31

64747 Breuberg / Germany

Phone: +49 (0)151 59995 268

E-mail: [info@andros.de](mailto:info@andros.de)

[www.andros.de](http://www.andros.de)

## Design

organic Marken-Kommunikation GmbH

Frankfurt am Main / Germany

[www.organic-communication.de](http://www.organic-communication.de)

Image source: title: dusanpetkovic, istock-photos.com | 05: NicoElNino, iStockphotos.com | 06: Spreewald | 09: howtogoto, iStockphoto.com | 10: My Odenwald | 12: My Odenwald | 13: Demid, istockphotos.com | 14: My Odenwald | 39: Andros





**ANDROS Deutschland GmbH**  
**Bahnhofstraße 31**  
**64747 Breuberg / Germany**