

## Code of Conduct

This Code of Conduct applies to all sites and departments of Fortin Mühlenwerke GmbH & Co.KG. At the same time, we also require all companies involved in our supply chain to comply with the principles defined in this Code. The global goals of the UN, the ILO standards and the OECD guidelines serve as the basis for the objectives listed here.

***For reasons of better readability, the language forms male, female and diverse (m/f/d) are not used simultaneously. All personal terms apply equally to all genders.***

Fortin Mühlenwerke GmbH & Co.KG supports and respects the protection of international human rights and the environment within its own range of influence; we ensure that we are not complicit in human rights violations and environmental degradation by ....

... taking measures to prevent accidents and **ensure safety at work,**

... **implementing measures to preserve and promote health,**

... conducting annual occupational safety training

... paying reasonable and fair wages and salaries

... not tolerating any forms of forced labour

... promoting freedom of speech and of assembly

... complying with and defending laws, regulations and the duties of governmental bodies

... not tolerating corruption, extortion or bribery

... treating all employees equally (regardless of **gender**, religion, skin colour, political views, sexual orientation, any disability or other personal characteristics),

... prohibiting any kind of discrimination

... having established and actively implementing ethical principles, promotion and maintenance of the health of human resources and safety at all levels in the management manual as company policy; this includes integrity, probity and respect for human dignity, include integrity, righteousness and respect for human dignity,

... not tolerating child labour (at the same time internships and apprenticeships are encouraged)

... protecting and supporting consumer rights

**The principles of the Code have the highest priority at Fortin Mühlenwerke, which is why the managing directors themselves are the human rights officers.**

We encourage and require environmental protection and energy conservation measures from all our employees, suppliers and companies working for us through ...

... annual training and projects on the subject of sustainability,

... the separation, sorting and reutilisation of any kind of recyclable materials,

... the implementation of the most effective energy flows,

... the use of technical means of communication,

... the consolidation of deliveries and as many shipments as possible by boat,

**... continuous contact with our suppliers (with occasional on-site visits).**

The principles laid down in this Code and Management Manual apply directly to our company as a whole.

We also expect our business partners to apply these principles to their business activities. Non-compliance may mean termination of the business relationship.

Every employee, regardless of his or her position in the company, must abide by these rules, both in-house and off-site.

**If the rules are violated, every employee or business partner, regardless of their hierarchical level, has the right and obligation to address their colleague directly, even if they are their superior.**

Accordingly, every employee and business partner has the right to an open and transparent response.

In addition to the above-mentioned internal principles, Fortin Mühlenwerke is committed to social responsibility. The company fulfils this obligation by supporting cultural institutions, social and charitable organizations and institutions.

## Procedure in the event of violations of our Code of Conduct

### **Violations of human rights, health and safety at work**

If a violation of the above principles is encountered, it must be reported directly to the immediate superior; if this superior is (also) under suspicion, the employee/witness concerned must turn to the next higher hierarchical level or directly to the management.

The burden of proof must be carried and any such case is treated confidentially and may not be made public.

Violations can be reported anonymously in a letter box (located at the 1st floor entrance to the foot bridge) or, for external business partners, via the email address [compliance@fortin.de](mailto:compliance@fortin.de).

In serious cases, the violation will have direct consequences in the sense that the employee will be confronted in a personal exchange, made aware of his/her misconduct, possibly given a formal reprimand or even suspended until further notice.

Every violation will be prosecuted under disciplinary and/or criminal law.

### **Violations of the environment and energy policy**

In case of violations / deviations from the requirements of the environmental and energy policies as well as conflicts of interest between employees, a personal discussion is sought in which the importance and reasons for the measures are explained once again and made comprehensible in order to emphasise the necessity **of these and to ensure the** cooperation of all employees.

In the event of repeated violations, the management reserves the right to issue a formal reprimand to the employee and, if necessary, to take further consequences/measures to prevent a recurrence of such a situation.

These procedures are also subject to the burden of proof and will be treated confidentially.

Conspicuous or affected stakeholders will be informed of their misconduct / the report and all transactions will be frozen until further notice.

Anonymous reports will be verified by immediate investigation and countermeasures - as named above - will be taken.

The management of the company hereby undertakes to **NEUTRALLY** and **RESOLUTELY** investigate any indication of a violation and to clarify the facts, even if these are against the management itself.

The management shall promote transparency, integrity and responsible leadership inside the company in an appropriate manner.

This commitment expresses our **endeavour** to contribute to the promotion of fair and sustainable standards in the areas of **health and safety**, social status, environmental responsibility and consumer relations, both inside the company and throughout the supply chain.

The undersigned are convinced that the utmost product and service quality must go hand in hand with the highest operational and workforce quality, and that consumers have a fundamental right to both.

*Düsseldorf, June 4<sup>th</sup> 2024*



R. Lamers - Managing Partner



U. Schumacher - Managing Partner