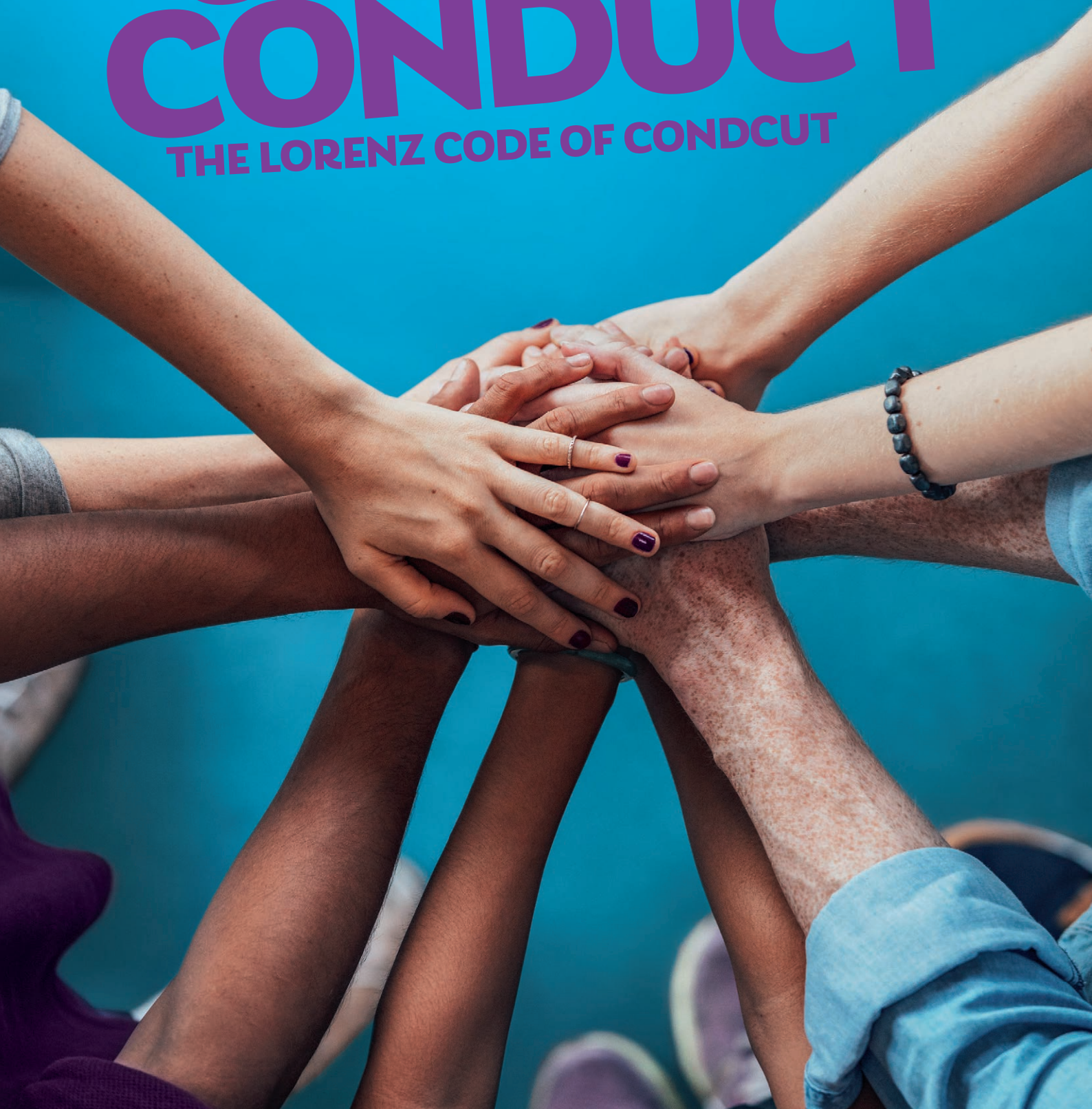


Lorenz

CODE OF CONDUCT

THE LORENZ CODE OF CONDCUT



lorenz WE ARE A FAMILY BUSINESS

DEAR COLLEAGUES,

It all began very small in 1889—with our family and the idea of using dough, potatoes, and nuts to make shelf-stable foods that would bring people joy. Since the very beginning, we have been thinking long-term and taking responsibility for the world of tomorrow. Today, we are an independent family business with experience that has grown over four generations in Germany and at our many international locations.

Wherever we work, we are united by shared values. We treat each other with respect; take responsibility for one another and for our actions; never stop learning; and contribute honestly, courageously, and with passion to shaping our future together.

For us, this sense of community means a clear commitment to democracy, freedom, tolerance, equality, and the rule of law. These principles and our corporate values form the basis of our actions worldwide. They guide us in how we treat each other as well as in our responsibility toward consumers, business partners, society, and the environment – today and for generations to come.

Our Code of Conduct puts these values into clear standards and principles of behavior. It applies to the entire Lorenz Group internationally. The principles of the Code of Conduct are binding for all employees. That makes it the heart of our compliance process, guiding us in our daily work and in all decisions we make. Where local laws or political circumstances go against our core values, we use what possibilities we have to advocate for following democratic principles and preserving internationally recognized human rights.

Value-based, ethical, legally and economically sound behavior is the foundation for our future. Please get to know our Code of Conduct, understand its contents, and live it in your daily work. Because every single one of us contributes to making life a little more beautiful in the future.

Yours,



Moritz Bahlsen



OUR WHY

**WE CARE
FOR EACH
INDIVIDUAL
SO THAT THEY
FEEL A SENSE
OF BELONGING
AND WELL-
BEING.**

OUR VALUES

**Treat others like you
want to be treated.**

Act like it's yours.

**Develop yourself
and others.**

Work together.

Share openly.

Work with passion.

**DOING.
BETTER.
TOGETHER.**

CONTENTS

WE KEEP OUR WORD – ALL AROUND THE WORLD 6

OUR PRINCIPLES 7

LIVING RESPONSIBILITY – TAKING A STAND 8

1. RESPECTING HUMAN RIGHTS AND NATIONAL LAWS 8

2. PROTECTING DIVERSITY AND EQUAL OPPORTUNITIES 8

3. ZERO TOLERANCE FOR CHILD, FORCED, OR COMPULSORY LABOR 9

4. RESPECTING FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING 9

5. OFFERING FAIR WAGES AND WORKING HOURS 10

6. DEALING FAIRLY WITH MISTAKES VERSUS RULE-BREAKING 10

7. LIVING OUR VALUES 11

8. COMMUNICATING CLEARLY AND RESPONSIBLY 12

SAFE AND APPRECIATIVE WORKPLACE 13

9. UPHOLDING HEALTH AND SAFETY AT WORK 13

10. PROTECTING CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY 13

11. HANDLING PERSONAL DATA RESPONSIBLY 14

12. KEEPING IT SYSTEMS SECURE 15

13. USING ARTIFICIAL INTELLIGENCE RESPONSIBLY 15

SOCIAL AND ECOLOGICAL COMMITMENT 16

14. GIVING BACK TO SOCIETY 16

15. TAKING RESPONSIBILITY FOR THE ENVIRONMENT AND SUSTAINABLE DEVELOPMENT 16

16. CONSERVING RESOURCES 17

17. MAKING AN ACTIVE CONTRIBUTION TO CLIMATE PROTECTION 17

18. PRESERVING BIODIVERSITY 18

19. RESPECTING THE RIGHTS OF LOCAL COMMUNITIES 18

RELIABLE AND ETHICAL BUSINESS PARTNERSHIP 19

20. MAKING SAFE, HIGH-QUALITY PRODUCTS 19

21. USING COMPANY ASSETS RESPONSIBLY 19

22. NO CORRUPTION, NO BRIBERY 20

23. REVIEWING ALL BUSINESS GIFTS CAREFULLY 20

24. HANDLING CONFLICTS OF INTEREST TRANSPARENTLY 20

25. PROMOTING FAIR COMPETITION 21

26. DOING DUE DILIGENCE IN BUSINESS RELATIONSHIPS 22

27. PREVENTING MONEY LAUNDERING AND TERRORISM FINANCING 22

28. COMPLYING WITH TAX AND CUSTOMS REGULATIONS 23

29. ACCOUNTING AND REPORTING ACCURATELY 24

30. DEALING TRANSPARENTLY WITH PUBLIC OFFICIALS AND ELECTED REPRESENTATIVES 24

LIVING OUR VALUES TOGETHER: SUPPORT AND GUIDANCE 25



Lorenz WE KEEP OUR WORD – ALL AROUND THE WORLD



Our Code of Conduct applies to the entire Lorenz Group*. The Code is a collective commitment to ethically, legally, and economically sound behavior. The principles described here are built on our corporate values and form the binding framework of our decisions and actions – both within and outside our company.

The principles of our Code of Conduct are binding for all companies and employees, managers, and executive bodies of the Lorenz Group. They serve as the foundation for all other specialized guidelines and policies within the Lorenz Group and guide our daily work as well as our business decisions.

We also expect our suppliers, service providers, and all business partners acting on our behalf to follow similar values and principles of conduct. This expectation is detailed in our Code of Conduct for Business Partners and is the foundation for working together in a spirit of responsibility and trust.

OUR RESPONSIBILITY

Each and every one of us is responsible for living our principles and complying with the Code of Conduct. Our Code cannot cover all the situations that might come up in our everyday work, and we cannot address the laws of all the different countries in which we operate. But our principles give us clear guidance. Our behavior shows character, creates a safe and respectful working environment, and actively contributes to the sustainable development of both the company and society. We act with integrity and comply with applicable laws, guidelines, and ethical principles. That is why all employees should know, understand, and apply our Code of Conduct.

To encourage this goal, we conduct regular training sessions and have created points of contact. In particular, our management and our executives act as role models by embodying our values and appropriate behavior, while consistently making sure that all

employees comply with our Code of Conduct. Additionally, our business units have a range of detailed guidelines and regulations covering specific subjects.

SERIOUS CONSEQUENCES

Violating the Code of Conduct or applicable laws can have serious implications for both individual employees and our company. That may include:

- Labor law proceedings
- Claims for damages
- Fines or imprisonment
- Permanent harm to our reputation or our brands

We take reports of violations very seriously, investigate them carefully, and take proper action.

Page 25 offers more information on contact persons and following our principles.

* The "Lorenz Group" includes Leithart Holding GmbH and all entities in which Leithart Holding GmbH holds a direct or indirect majority interest.

Lorenz OUR PRINCIPLES



1. LIVING RESPONSIBILITY – TAKING A STAND



2. SAFE & APPRECIATIVE WORKPLACE



3. SOCIAL & ECOLOGICAL COMMITMENT



4. RELIABLE & ETHICAL BUSINESS PARTNERSHIP



Lorenz LIVING RESPONSIBILITY – TAKING A STAND



1. RESPECTING HUMAN RIGHTS AND NATIONAL LAWS

The Lorenz Group respects international human rights as laid down in UN conventions and the core conventions of the International Labour Organization (ILO). We have codified this responsibility in our Human Rights Policy. Our actions are aligned with the Universal Declaration of Human Rights (UN), the European Convention on Human Rights (ECHR), and the Charter of Fundamental Rights of the European Union, as well as the UN Guiding Principles on Business and Human Rights. These documents are important guides for our entrepreneurial actions.

As a matter of course, we comply with the laws and regulations of all countries where we operate, and with minimum industry standards. If these conflict with international human rights standards, we always follow the principles of the UN Charter of Human Rights. Making a profit must never be used as an excuse for failing to comply with laws, avoiding responsibility, or taking inappropriate risks.

MY CONTRIBUTION

As an employee, I too can help make sure human rights are followed. I recognize human rights as fundamental guideline and make sure that they are respected around me.

If there are any signs of human rights violations in my work environment, I make sure that they are prevented or remedied immediately. I also have to report human rights violations under any circumstances via our whistleblowing portal, Tell us! It may even be helpful for me to inform a manager or get in touch with our dedicated contact persons (page 25).

Example

You have received a note suggesting that one of our suppliers is not paying their employees the salary they are entitled to (or pays them

below minimum wage) and is violating the law on working hours by tolerating an eighty-hour work week.

Report the case via Tell us! and/or let a manager know there are signs of possible human rights violations. We take those signs very seriously, will examine them thoroughly, and will take any necessary steps.



2. PROTECTING DIVERSITY AND EQUAL OPPORTUNITIES

People are at the center of everything we do. We want to create a workplace atmosphere where everyone feels they belong and where everyone is respected and valued as a person. That is why we promote equal opportunities, diversity, and freedom from prejudice. We believe in respectful and cooperative interaction, practice tolerance, and are committed to an inclusive workplace. We have zero tolerance for discrimination – at any place and any time.

We work together regardless of gender and gender identity, sexual orientation, age, origin, nationality, religion, caste, skin color, health, disability, membership in employee organizations including trade unions, family obligations, marital status, or any other comparable circumstance. (This list is not exhaustive, and its order does not indicate priorities.) This applies to our employees as well as in dealings with others.

ILO Equal Remuneration Convention, 1951 (No. 100), ILO Discrimination (Employment and Occupation) Convention, 1958 (No. 111)

MY CONTRIBUTION

Diversity and equal opportunities make us stronger! I actively make sure that all people around me are treated with respect and fairness, and I encourage others to do the same.



If I see someone being treated unfairly or put at a disadvantage – whether through discrimination, harassment, or bullying – I speak up. If I cannot resolve the situation on my own, I get in touch with our dedicated contact persons (page 25). Together, we ensure an open and respectful atmosphere.

Example

People in your place of work are making derogatory comments about others based on their nationality, physical abilities, gender, sexual orientation, or skin color. Bring up this discriminatory behavior directly, or get in touch with a manager or our dedicated contact persons (page 25).



3. ZERO TOLERANCE FOR CHILD, FORCED, OR COMPULSORY LABOR

We do not tolerate illegal forms of work by children under the age of 15 (or 14, where permitted by national law in accordance with ILO Convention 138). Adolescent workers under the age of 18 must never work nights or under dangerous conditions.

In addition, we do not allow any form of forced or compulsory labor as well as unlawful disciplinary measures. We make sure that all our employees work in conditions that they freely agree to beforehand, are documented, and are presented in ways they understand. Verbal abuse or corporal punishment, sexual harassment, or any psychological or physical coercion are strictly forbidden. If legal measures against one of our employees become necessary for a serious violation, like a breach of this Code of Conduct or a company policy, we always carry these out in accordance with national and international laws and internationally recognized human rights.

ILO Forced Labour Convention, 1930 (No. 29), ILO Abolition of Forced Labour Convention, 1957 (No. 105), ILO Minimum Age Convention, 1973 (No. 138), ILO Worst Forms of Child Labour Convention, 1999 (No. 182)

MY CONTRIBUTION

As an employee, I can actively contribute to living these values. I make sure youth labor protection laws are complied with and keep an eye out for any form of forced labor. If I notice something that is not right, I speak up and ensure that potential misconduct is prevented or remedied immediately. If necessary, I talk to a manager or get in touch with our dedicated contact persons (page 25).

Example

You are part of a site visit or a supplier audit and notice employees who look young. If the suspicion of child or adolescent labor is confirmed, remedial steps have to be taken immediately. If uncertainties remain, you have to make sure that further review takes place. In any case, tell the Human Rights Officer and the Director of Purchasing.



4. RESPECTING FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

We respect the right of our employees to form organizations of their choice, to join them, and to take part in collective bargaining. Where this right is restricted by laws, our employees are free to choose their own representatives and to organize. Employee representatives are protected against any discrimination, and we make sure that they can exercise their rights in a free and fair environment.

ILO Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), ILO Right to Organise and Collective Bargaining Convention, 1949 (No. 98)

MY CONTRIBUTION

I uphold the principles of freedom of association and the right to collective bargaining. If I notice violations, I speak up or report them so that we can ensure fair treatment together.

Example

Colleagues report that their supervisors have made derogatory comments about their involvement in the works council and have even discouraged them. I encourage them to bring up this incident or to get in touch with our dedicated contact persons (page 25).





5. OFFERING FAIR WAGES AND WORKING HOURS

Our employees receive appropriate pay which is based on at least the local statutory minimum wage and the respective labor market. Wages at our company are always contractually agreed and are paid on time, regularly, and in full. Before new employees start a job at our company, they are given transparent written information about their working conditions and salary.

We want our working hours to be compatible with a fulfilling life. We make sure that employees can find a good balance between work, family, and private life. Along the way, all working time agreements comply with local legislation and also with the ILO core labor standards. Our employees are entitled to paid time off, at the very least in accordance with the respective national regulations. We also make sure that employees take the agreed vacation time.

MY CONTRIBUTION

I follow working and rest times in accordance with local regulations and the ILO core labor standards. If I have a management or leadership role, I make sure that everyone in my area of responsibility gets paid at least the statutory minimum wage – including at our partners such as temporary employment agencies or service providers.

Example

You are responsible for awarding a contract to an outside service provider, for example for cleaning work. You learn that the service provider you commissioned is paying their cleaners less than the statutory minimum wage. Talk to the service provider directly and demand proof (such as payroll statements) that they comply with the statutory minimum wage. Document the conversation. Also, check the existing contract with the service provider to see if it contains a clause regarding compliance with the minimum wage. If it does not, such an agreement has to be added under any circumstances. If the service provider does not prove they pay employees the minimum wage or refuses to adjust their wages, talk to your supervisor and/or get in touch with our dedicated contact persons (page 25).



6. DEALING FAIRLY WITH MISTAKES VERSUS RULE-BREAKING

ADDRESS MISTAKES OPENLY: LEARN AND IMPROVE TOGETHER

Mistakes happen, and they are opportunities to learn and improve. The important thing is that we deal with them openly. We address problems honestly, seek advice, and look for solutions together. Everyone who contributes to this culture of failure can

rely on protection and support in dealing with mistakes. For us, critical feedback is an invitation to grow together, learn from each other, and bring out the best in ourselves and our work together.

TAKE RULE-BREAKING VIOLATIONS SERIOUSLY: SHOW RESPONSIBILITY

We follow external and internal regulations as a matter of course. Looking away is never an option: if we see misconduct or violations, we act. We react quickly and appropriately, clearing up the situation and preventing it for the future.

Our managers have a special responsibility here. They model a culture of dealing with mistakes openly, and they help their teams comply with our principles and guidelines, while taking strong steps to find and address rule breaking violations.

MY CONTRIBUTION

Addressing Mistakes Directly: When I notice a mistake – mine or someone else's – I speak up frankly and respectfully. Together we look for solutions and learn from the mistake.

Reporting Serious Violations: If I have a justified suspicion of serious or deliberate violations, I act immediately: I report the incident to a manager or to our dedicated contact persons (page 25). Where necessary, I support systematic investigation and documentation. I can also report serious violations via the whistleblowing portal Tell us! Our superiors in management roles are obligated to report such violations via Tell us!

Examples of Serious Violations: A violation is considered serious if it has the potential to cause significant harm to a person, our company, our employees, or society. Some examples are:

- Violations of applicable laws such as competition law, foreign trade law, data protection regulations, labor law, food safety law
- Economic crimes such as fraud, breach of trust, theft, embezzlement, corruption
- Human rights violations, sexual harassment, or unequal treatment (violations of anti-discrimination laws)
- Violations of laws and regulations meant to protect life and limb or occupational health, or of laws protecting employee rights or their representative bodies
- Violations of our internal regulations, such as our AI guidelines.

Example

Addressing Mistakes Honestly: After an important submission deadline for a project proposal, you notice that your team has made a mistake – and that the mistake would affect the decision-making process. Do not hesitate: immediately tell your manager and the recipients of the flawed project proposal. Together you can find a solution to correct the documents. Afterward, discuss with your team how you can learn from the mistake and prevent it in the future.

Reporting Violations: An employee intentionally files private expenses as travel expenses. You notice and tell a manager or our dedicated contact persons. The violation is documented and checked, and we then follow through on any necessary steps.



7. LIVING OUR VALUES

We believe firmly in our values and act on them. Our values guide us every day. They orient us, build trust, and connect us across all our different departments. No matter where we work, whether in a factory, in field sales, or an office, we take responsibility: for ourselves, for our teams, and for our company. We contribute our skills, treat each other with fairness and respect, and ground our decisions in integrity and our values.

For us, leadership is more than a duty – it is an attitude. Good leadership unites people who want to make a difference together. That is why the leadership we embody is based on an agile mindset, on trust, personal responsibility, willingness to learn, and cooperation on an equal footing. We make space for personal growth, encourage people to try new ways of doing things, and promote cooperation across departments.

Thoughtfulness and integrity are especially important wherever responsibility, influence, or personal closeness come into play. We never take advantage of our roles or authority, least of all if there are professional hierarchies or dependencies. We always make decisions based on our values, principles, and rules, with a view to the common good and for the benefit of all involved.

MY CONTRIBUTION

I act on our values and take responsibility for my actions. I treat others with respect, listen actively, and promote open and appreciative communication. I make sure that decisions around me are made transparently, fairly, and in line with our values. I help colleagues play to their strengths, and I create a workplace that fosters personal responsibility and willingness to learn. If I find that our actions do not align with our values, I speak up constructively and am part of a solution.

Example

In a team meeting, I notice that a colleague is barely getting a word in. To make sure that everyone is included and feels they belong, I actively invite her to share her thoughts. Her idea provides a valuable impulse for our project, and together we develop it further. This is how we show respect, work together, and use everybody's strengths.



8. COMMUNICATING CLEARLY AND RESPONSIBLY

Trust is earned. For us, it is built on honest, transparent, respectful, and reliable communication. We keep our word and do not make empty promises that might risk the trust of our consumers, employees, or business partners.

It is important to us to provide accurate information and send messages that are clear, understandable, and legally compliant. This includes making sure that we never use misleading statements or dishonest methods in advertising, marketing, or packaging. We want our communication to give consumers reliable guidance – whether about quality, ingredients, nutritional values, or sustainability. We only make promises about these topics if we can show we keep them.

That is why we coordinate planned communication and marketing activities with the responsible department ahead of time.

Responsibility: We take our responsibility to our consumers very seriously. That supporting them make more mindful dietary choices. That is why for many years we have been a member of the EU Pledge, a voluntary initiative of leading food and beverage companies. We commit to not advertising in ways that specifically target children under the age of 14. In any public communication, we make sure not to give any false impressions, in order to help parents teach their children how to eat a balanced diet.

MY CONTRIBUTION

I always communicate honestly, clearly, and respectfully. When I pass on information, I make sure that it is true, easy to understand, and makes sense. I avoid speculation and do not make statements about subjects unless they have been decided, implemented, or are at least a work in progress.

I forward public relations or media inquiries to our Communications team for well-founded and consistent answers. In social networks and at public events, I make clear when I am expressing my own views, and I follow our guidelines for corporate communication.

I make sure that our communication is responsible and that our advertising does not specifically target children. If I am unsure whether a measure complies with our requirements, I get in touch with Corporate Communications or our dedicated contact persons (page 25).

Example

On the internet, you come across a comment in which an outside person makes false claims about our production methods.

Even though you may want to correct the misinformation right away, contact the Communications team. They will check the facts of the situation and respond with a well-founded, appropriate answer.



Lorenz SAFE & APPRECIATIVE WORKPLACE



9. UPHOLDING HEALTH AND SAFETY AT WORK

In addition to our social responsibility, we at Lorenz also have a corporate responsibility to protect our employees. That is why we make protecting occupational health and safety a part of all our operational processes, creating a safe workplace. All employees do their part by complying with our safety regulations. If we discover deficiencies, such as potential hazards or accident risks, we point them out and fix them. We hold occupational safety training sessions for our employees based on their respective workstations.

We give special protection to adolescent workers, pregnant women, and other especially vulnerable employees.

ILO Occupational Safety and Health Convention, 1981 (No. 155), ILO Promotional Framework for Occupational Safety and Health Convention, 2006 (No. 187)

MY CONTRIBUTION

I follow the regulations and instructions on occupational safety and health protection. I never put my own health and safety, nor that of my team or others, at risk. I actively speak up about unsafe situations and accept help when I need it.

Where it is my responsibility, I take all necessary and legally required measures to make sure the workplace is safe. I point out unsafe actions or conditions, take part in training and instruction, and put my knowledge into practice.

Example

While the production machine is being filled, a large amount of cooking oil leaks from a broken pipe. Instead of continuing the work, I immediately stop the process, block off the area, and tell the responsible specialist. Together, we make sure that the spilled liquid is properly absorbed and disposed of and that the pipe is repaired. My thoughtful action prevents danger to colleagues and damage to the facility.



10. PROTECTING CONFIDENTIAL INFORMATION AND INTELLECTUAL PROPERTY

Each of us is responsible for making sure that confidential information, our intellectual property, and Lorenz know-how stay protected. Company information that is not approved for publication is confidential and must not be passed on to unauthorized persons – including friends and family. Likewise, it is forbidden to use confidential business information for one's own advantage, for the advantage of others, or to the detriment of Lorenz. This applies even when a person is no longer employed by the company.

We respect the rights of others. That means we never illegally get hold of, use, or spread others' trade secrets or intellectual property.

MY CONTRIBUTION

I handle all company information responsibly and protect it from unauthorized access. I am particularly careful when dealing with confidential information such as technical know-how, recipes, manufacturing processes, products in development, business strategies, and trade and business secrets. To share information within the company, I always use the secure channels provided by the company and use only company devices, software, and communication tools. If a document is no longer needed and I am not required to store it, I dispose of it securely in the designated containers rather than throwing it in the regular trash.

Example

You are helping develop innovative technology or a new product and are supposed to present your results at a different company location. On the way there, you want to review the presentation again on the train or plane. Make sure that no one sees any confidential





information, as this could have serious consequences for our company. Make sure that travelers around you cannot see your screen or follow conversations. To do this, use privacy filters for your laptop, do not use public hotspots or Wi-Fi connections, and do not discuss confidential information in public spaces.



11. HANDLING PERSONAL DATA RESPONSIBLY

We take the protection of personal data very seriously. That is why we treat the personal data of our employees – including former colleagues and job applicants – just as carefully as the data of consumers, business partners, affiliates, and anyone else who is in contact with us or tries to reach us. Whenever we collect or use personal data, we follow strict requirements and protect the rights of the persons concerned. That way we ensure that we comply with every person's right to data protection.

MY CONTRIBUTION

I handle personal data with care. From the moment it is first collected until it is destroyed or deleted, I use personal data for only the permissible purposes and in compliance with our data protection guidelines. I am responsible for the security of personal data in my work and surroundings. In cases of doubt, I get in touch with the responsible data protection coordinator (see our Intranet post on CONNECT or page 25).

Example

You want to use an existing contact list with personal data of sweepstakes entrants for a new promotional campaign. However, the data can be used only for the original purpose for which it was collected (in this case, conducting the sweepstakes and notifying the winners). You aren't even allowed to just internally transfer this data for your new promotional campaign. So you have to make sure that the data collection and use comply with the data protection requirements and applicable laws. On principle, personal data can only be processed for the purpose for which it was collected. Check with the responsible data protection coordinators ahead of time whether consent is required, how data subjects should be informed, and whether a transfer to other departments is allowed.



12. KEEPING IT SYSTEMS SECURE

On email, smartphone, or in the cloud – IT security starts with each of us. We protect our end devices, networks, access points, and services, along with the information stored there, by acting with care, following the applicable rules, and sticking to our IT security policy at all times.

Regular IT security training helps us to remain vigilant in everyday work: from choosing strong passwords to looking out for phishing and using our work equipment safely. Each of us contributes to identifying and avoiding risks. In addition, our company employs professional technical and organizational security measures and works closely with its IT service providers to defend against potential cyberattacks. That way we as a company stay reliable, trustworthy, and secure – for ourselves, our partners, and our customers.

MY CONTRIBUTION

I get to know the applicable IT security requirements for our systems and follow them consistently. By keeping my eyes open, reporting suspicious activities, and regularly updating my knowledge of IT security, I can actively contribute to IT security. I am responsible for all work equipment and information entrusted to me. At all times and places, I make sure that only authorized persons have access. If I have questions about IT security or suspicious behavior of the IT systems, I get in touch with the IT Service Desk or IT Security Officers as quickly as possible.

Example

On a business trip, you have no reception with the SIM card provided by Lorenz, but you still want to send a confidential document to a colleague. There is free but unencrypted Wi-Fi at a café nearby. You know that even popular, free services often pose a security risk, so you do not use the café's Wi-Fi. The café's insufficient security measures can mean vulnerabilities for hackers and thus a danger for our company data.

So you only use the cloud services approved by Lorenz and, if necessary, talk to the IT department before using any other cloud services for processing business data. That way you make sure that confidential information stays protected and prevent unnecessary vulnerabilities.



13. USING ARTIFICIAL INTELLIGENCE RESPONSIBLY

Artificial intelligence (AI) has become an integral part of our everyday work and an important driver of innovation and new ways of working. It is more than just a tool – it influences how we build knowledge, design processes, make decisions, and much more. But AI has no ethical principles or values. That is why it is our responsibility to use AI thoughtfully and intentionally. Human judgment is and will always be indispensable for deciding what is ethical, good, and right.

We are committed to using AI responsibly, in line with our values, and for the good of the people we work with. This means ethical, secure, and legally compliant use in accordance with applicable laws such as the EU AI Regulation and the GDPR, as well as our internal standards (AI Guideline).

When using AI, the most important priority is to protect information: That is why we use only the AI systems and solutions approved by Corporate IT. In addition, we always follow the requirements of our AI Guideline. Whenever you use AI, you also have to comply with our other internal guidelines. That includes, in particular, safety and data protection instructions and requirements, as well as corresponding works agreements.

As a general rule: If in doubt, ask. If you have questions or concerns, talk to the responsible contact persons (IT, data protection, or legal departments) at any time.

MY CONTRIBUTION

Using AI responsibly is everyone's responsibility. I know the Lorenz AI Guideline and know how I am allowed to use AI systems in my area of work and what data they access. When I use AI, I handle confidential information and personal data carefully and critically check AI results before I keep using them. Through internal training, I keep up to date on how to use AI safely and responsibly, and I learn how I can use the potential of AI thoughtfully and intentionally. If I am unsure or notice risks, I actively bring them up with our dedicated contact persons (page 25) or with the IT, data protection, or legal departments.

Example

You want to use an AI tool to help revise a text. Before you upload it, you check: Is the AI tool approved by Lorenz IT? Does the text contain confidential information or personal data that deserves special protection? What requirements from the AI Guideline and other internal standards do you have to follow in this context?

Lorenz SOCIAL & ECOLOGICAL COMMITMENT



14. GIVING BACK TO SOCIETY

As a family business, it's only natural for us to give something back. We are involved in social, civic, and cultural projects that strengthen community, build opportunities, and support sustainability goals. Our donation and sponsorship projects are transparent, easy to understand, and in line with our values and applicable laws.

We make a clear distinction between donation and sponsorship:

- A donation is always a voluntary contribution without any expectation of getting something in return. It serves a charitable purpose. A public thank you that does not advertise is all that can be given in return.
- Sponsorship is a partnership where there is a contractual exchange. That includes, for example, the placement of a logo or the mention in communication materials

For both donation and sponsorship measures, we document all measures in ways that are trackable and ensure that the recipient, purpose, and use of the funds are transparent and can be verified.

Because we want our activities to serve the common good, we never make financial contributions to political parties, party-affiliated organizations, or individuals.

MY CONTRIBUTION

I understand and know the differences between donations and sponsorship.

Specifically, for donations, this means: I make sure that nothing in return for the donation is expected or provided that goes beyond acknowledgment alone. At the same time, I make sure that the purpose, recipient, and payment of the donation are

documented to guarantee traceability (for example through donation receipts).

For sponsorship, this means: I make sure that any considerations are contractually agreed on in writing, documented, and communicated transparently.

If I am unsure or confused, I always seek advice from our dedicated contact persons (page 25) to protect the integrity of Lorenz and make sure we comply with all legal and tax requirements.

Example

A local association asks Lorenz to support a social project. You like the idea—but before you promise a donation, you check: Does the project match our values, and is the organization recognized as charitable by the authorities? Is there clear information on how the money will be used?

You talk to the responsible office in the company (page 25) to coordinate the next steps. That way you can make sure that our commitment is transparent, responsible, and charitable.



15. TAKING RESPONSIBILITY FOR THE ENVIRONMENT AND SUSTAINABLE DEVELOPMENT

We want to successfully hand down our company to future generations. The most important basis for that is a healthy and undisturbed natural world. That is why we commit to developing our company sustainably and are always working to reduce our negative environmental impact; for example by reducing emissions, conserving resources, or preventing waste. Every one of us can contribute to preserving and protecting our environment.



17. MAKING AN ACTIVE CONTRIBUTION TO CLIMATE PROTECTION

We are aware of our responsibility for the environment and want to actively contribute to climate protection. That means we are committed to significantly reducing our greenhouse gas emissions along the entire value chain. Our commitment focuses on our production sites and logistics, but also our upstream value chain, such as our raw materials.

We have set ourselves ambitious, science-based climate targets to further this commitment. We want to do our part to help reach the goals agreed at the UN Climate Conference in Paris and the 1.5°C target set by the Intergovernmental Panel on Climate Change (IPCC).

MY CONTRIBUTION

I can make a difference and actively contribute to climate protection. That can mean purposely reducing energy consumption at the workplace, having meetings online instead of traveling for business, or contributing ideas for how we can keep reducing our environmental footprint in general.

Example

During a production standstill, you notice that the conveyor belts are still running even though no product is being transported. That wastes energy. You report the problem to your manager or the responsible department as soon as possible to avoid unnecessary costs and reduce electricity consumption.

Our responsibility includes everything we do: our brands and products, our locations, all activities, and even the upstream and downstream value chain. We regularly explore how to make our processes more environmentally friendly. We also rely on technologies that are advanced, efficient, and conserve resources. In all this, we look at our products' whole life cycle, starting with the cultivation of the raw materials, through development and manufacturing, all the way to the disposal of packaging. When we develop products, we make sure that natural resources are used responsibly and that environmental impact is reduced step by step. We regularly review our manufacturing processes to implement improvements and find more sustainable solutions. Along the way, we comply with all environmental protection laws and regulations as a matter of course.

MY CONTRIBUTION

Sustainability starts with me. In my everyday work, I actively think about environmental protection and use resources such as energy or water thoughtfully and sparingly. I make sure to keep the negative effects of my activity on the environment as low as possible. In the process, I follow the applicable environmental regulations and internal guidelines for my workplace.

Example

You notice that a tank in a facility is broken and a large amount of raw materials is leaking into the ground. Nobody else seems to have noticed the leak, and you worry that all the material will leak out.

Immediately tell someone in charge and draw attention to the problem. Do not rely on someone else to report the leak.



16. CONSERVING RESOURCES

We need a wide range of resources and raw materials to make our products. That gives us a special responsibility for using them sustainably and efficiently. We expect all employees to handle raw materials, water, energy, operating materials, and land with care and to avoid unnecessary waste. We also take responsibility along the value chain. Careful and efficient use of resources not only protects the environment but also benefits society – that is, all of us, as well as the company.

MY CONTRIBUTION

I follow the operational guidelines and handle resources and company assets responsibly. By acting thoughtfully, I contribute to avoiding waste and protecting our environment.

Example

The production process regularly produces cutting waste, for example from foil packaging. You notice that better machine settings could help avoid some of this waste. You bring this up with your manager or the responsible department and work toward a solution that uses the material more efficiently.



18. PRESERVING BIODIVERSITY

We want to contribute to preserving biological diversity and promote soil health. That is why we aim to protect valuable habitats and prevent deforestation, since forest loss threatens biodiversity and can lead to high greenhouse gas emissions. Together with our agricultural partners, we support sustainable farming practices that promote soil health and biodiversity. That includes actively helping farmers shift to regenerative agricultural methods meant to improve soil fertility and foster species diversity.

MY CONTRIBUTION

I play an important part in protecting biodiversity by ensuring that the raw materials and suppliers I choose use farming practices that do not cause deforestation or forest conversion and, ideally, support soil health and biodiversity. All this is based on our Responsible Sourcing Commitment. That is how I can help preserve valuable habitats and prevent biodiversity loss.

Example

You are responsible for buying paper and cardboard packaging. A new supplier offers low-cost materials but cannot provide FSC® certification, evidence of where the wood came from, or proof that they prevent deforestation. You decline the offer and make sure that only suppliers with the required certifications and documentation take part in the tender. You always ask for these documents and check them before entering into any contract.



19. RESPECTING THE RIGHTS OF LOCAL COMMUNITIES

We respect and uphold the rights of local communities – especially their right to access and use land, water, and forests. These resources often form the basis of their livelihoods and hold significant cultural value. Unlawful displacement or unauthorized extraction of resources is clearly against our values and is strictly prohibited.

MY CONTRIBUTION

I consider locals' rights early on – especially when making decisions about buying land, site selection, or choice of business partners. I make sure to identify possible risks and take them into account in risk analyses. If necessary, I call for suitable protective measures, for example, by involving affected groups early on, conducting a risk and impact assessment, and ensuring that usage and access rights are respected and maintained in the long term.

Example

The company is expanding a site and considering buying land. Before any decision is made, I check whether the local communities' rights to land, water, or forests may be affected. I carefully document the results and make sure that the affected groups are involved and that their interests are taken into account.



Lorenz RELIABLE & ETHICAL BUSINESS PARTNERSHIP



20. MAKING SAFE, HIGH-QUALITY PRODUCTS

Our international brands and products represent safety and quality – that is the standard we at Lorenz hold ourselves to. With quality, diligence, and reliability, we want our products not just to taste good but also to inspire. Our top priority is that the products we make and market are always safe and comply with all legal and customer requirements.

That responsibility lies with each of us at Lorenz – regardless of our role or department.

To make sure that our consumers and business partners can rely on us, we focus firmly on food safety, quality, legality, and the authenticity of our products and services. That starts with the careful selection of our raw materials and packaging and continues through manufacturing and logistics. Our processes are also designed to prevent potential sources of error right from the start. Together with our suppliers and service providers, we are always working to make our products more nutritious and keep developing our production processes accordingly. At the same time, we are committed to always improving our food safety and quality systems and processes – while never compromising our sustainability principles.

MY CONTRIBUTION

I am responsible for food safety and quality. That means I consistently follow all applicable requirements, standards, and processes in product development and manufacturing. Even under time pressure or when trying to cut costs, I always stick to product specifications. I follow our defined processes and actively help improve them and close any possible gaps. If I have any questions or concerns about product safety or quality, I talk to my manager or the Quality Management team immediately and directly.

Example

A consumer comes to us with a complaint because they are dissatisfied with the quality of a product. Report the case to our Consumer Service team immediately. Your quick answer makes all the difference: it helps us find the cause directly, resolve the complaint, and guarantee the quality of our products and the satisfaction of our consumers.



21. USING COMPANY ASSETS RESPONSIBLY

From products, raw and auxiliary materials, machinery, and work equipment to IT systems, financial resources, intellectual property, and trade secrets, our company assets (both physical and intangible) are valuable. That is why we handle them responsibly, conserving resources and using them with care.

We use company assets for business purposes only: private use is permitted only where this is expressly stated in internal guidelines or regulations. What's more, we have detailed guidelines covering the proper use of assets depending on the department.

MY CONTRIBUTION

I handle any company property – from work equipment to vehicles and devices – with care. I do the same for intangible assets such as intellectual property. If there is any damage, loss, theft, or misuse, I tell my manager immediately.

Example

You work in production. During your shift, you notice that a machine is making unusual noises. Instead of keeping production running, you immediately let the technical department know.

and stop the process if necessary. That way you help prevent major damage to company assets and make sure our facilities continue to operate reliably in the long term.



22. NO CORRUPTION, NO BRIBERY

Corruption destroys trust, harms society, and undermines economic fairness. That is why corruption is a crime everywhere and incompatible with our values at Lorenz. We reject any form of corruption in our company. That includes bribery, “lubrication fees,” kickbacks, improper benefits, and the misuse of donations and memberships. Our employees are never allowed to offer, promise, or grant personal advantages to others – such as public officials or employees of private companies – to influence their decisions in inappropriate ways. Conversely, no one at Lorenz can accept, request, or be promised personal advantages if doing so could even make it look like business decisions are no longer impartial. Any such incident – including any attempt – has to be reported immediately.

MY CONTRIBUTION

I never allow myself to be swayed by personal benefits – and I never offer such benefits to others to influence decisions. My actions are always honest, fair, and impartial. Before I give or accept gifts or extend or accept invitations, I get to know the applicable Lorenz policies or talk to Compliance. If something seems suspicious to me – for example, an unusual gift, an invitation, or an offer – I speak up or report it to our dedicated contact persons (page 25). That protects both me and our company.

Example

You visit a supplier to check a part for our production machinery.

During your visit, there are signs that the parts have significant problems. The supplier's representative offers you money to ignore the problems and to persuade you to accept the faulty parts.

Do not accept the payment under any circumstances. Tell your manager or Compliance immediately. We do not tolerate even the attempt at bribery. That is how you show that decisions at Lorenz are not for sale.



23. REVIEWING ALL BUSINESS GIFTS CAREFULLY

Our brands, products, and services seal the deal – not gifts or invitations. Business courtesies at Lorenz are only permitted if they are appropriate in scope and value.

We refuse to accept high-value gifts, disproportionate invitations, or financial benefits, to make sure our employees and the company are always on the right side of the law. In rare cases, low-value gifts or reasonable hospitality may be acceptable – provided nothing is expected in return and the courtesy does not even appear to sway a business decision.

For a sense of appropriate value, the relevant tax-exempt amount for non-cash benefits per case and year can be used as a guideline. We are particularly careful about gifts or invitations involving public officials or their relatives. Gifts or invitations like this are forbidden in most countries, so we generally do not allow them. If you have questions or are unsure, get in touch with Compliance.

Our internal policies clearly define what types of courtesies are acceptable and what review steps have to be taken before granting or accepting anything – such as gifts, invitations, or business meals.

MY CONTRIBUTION

I handle gifts and invitations responsibly and with care. Before I accept or offer anything, I make sure that it is allowed in our internal policies. I make clear that nothing is expected in return, and I never let my business decisions be swayed. When in doubt, I talk to Compliance.

Example

A business partner with whom you are negotiating a contract gives you an invitation to an exclusive sports event with catering. You are unsure whether accepting the invitation is appropriate or could send the wrong message.

Before accepting, you check the invitation against internal policies and discuss the case with Compliance. That way, your actions comply with our rules and create transparency.



24. HANDLING CONFLICTS OF INTEREST TRANSPARENTLY

Our corporate culture is grounded in integrity. That is why we always make business decisions in the interests of the company, not for personal gain. We never seek a personal advantage or our own independent business opportunities.

We avoid any business relationship that could even look like a conflict of interest. If an actual or possible conflict of interest comes up anyway, we disclose it to Compliance immediately, so it can be reviewed and cleared up transparently.

A conflict of interest can happen when personal or private interests (like financial gain) influence, or might influence, work-related decisions. That applies not only to us as employees, but

also to people close to us; for example, through personal relationships, corporate holdings, second jobs, memberships, or financial connections.

Business relationships with third parties, such as business partners, can also play a role. What matters is that we recognize potential conflicts, address them honestly, and make sure they are properly resolved.

MY CONTRIBUTION

I am always watchful and avoid potential conflicts of interest concerning my own position within the company or that of people close to me. If a conflict of interest – or even the suspicion of one—does come up, I report it immediately and transparently to Compliance so it can be handled appropriately.

Example

Your manager asks you to check the offers of several creative agencies and make a shortlist. While working on it, you notice that one of the best proposals comes from an agency owned by a very close friend. In this situation, it is essential to be open and honest: Tell Compliance and your manager about your personal connection to the agency. Step back from the decision-making process to avoid any appearance of a conflict of interest. That way you make sure the final choice is fair.



25. PROMOTING FAIR COMPETITION

Our company's success is built on free and fair competition. At Lorenz, we comply with all applicable antitrust and competition laws – at the local, national, and international level.

One of our iron-clad rules: we never cut deals with competitors, never engage in price-fixing, never divvy up markets or customer groups, never boycott specific business partners or suppliers, and never artificially limit production or sales.

Antitrust rules protect fair competition, benefitting all market participants. Violations can have serious consequences: harming our reputation and leading to substantial fines, penalties, or damage claims.

In particular, all of the following are forbidden:

- Deals or acting in concert with competitors, suppliers, or customers in ways that limit or distort competition
- Exchanging sensitive market information such as prices, price components, discounts, margins, or sales volumes
- Abusing our market position

We at Lorenz always act fairly, lawfully, and in ways that pro-

mote open market competition. We are happy to compete with other companies – but always in line with the law and our ethical principles.

MY CONTRIBUTION

In my day-to-day work, I comply with all applicable competition and antitrust rules. I avoid any form of unfair deals or collusion – whether in face-to-face meetings, over the phone, or by email. I never share sensitive information about prices, customers, markets, or terms and conditions with competitors. Likewise, in any interaction with competitors, I make sure that I do not receive sensitive information that could give away current or future business behavior. In conversations or any other contact with competitors, I avoid topics that could be relevant to competition between us.

If I am unsure what information or behavior is allowed, I ask either my manager or our designated contact persons (page 25).

Example

At a conference or while taking part in an industry association, you start talking with a colleague who works for a competitor. She starts to tell you about sensitive topics such as upcoming price increases and asks about our plans.

You end the conversation politely but firmly and unmistakably. State clearly that you cannot and will not talk about those topics for competitive reasons. Then leave the group or the room to physically distance yourself from the situation. Where applicable, have your objection recorded in the minutes before you leave, or immediately after the conversation write a brief memo for your records: what topics were talked about, with whom, when, and where. Forward this memo to your manager and Compliance as soon as possible. That way you protect yourself and the company from any suspicion of unlawful collusion, which is forbidden even in industry associations.



26. DOING DUE DILIGENCE IN BUSINESS RELATIONSHIPS

We only work with business partners who share our values and standards. Therefore, we choose our suppliers, service providers, and other business partners based on clear, objective criteria and fair competition.

Our cooperation is always in line with applicable laws and with our internal policies and principles. Before entering into new business relationships, we vet the integrity of potential partners thoroughly. We follow established processes and communicate with the appropriate contact persons when starting partnerships.

We involve relevant departments early on in the review process – for example, Purchasing to verify supplier documentation and Finance/Customs to check credit ratings or sanctions lists. That way, we make sure that every partnership rests on a sound technical, legal, and ethical foundation.

MY CONTRIBUTION

It is important to me that we only work with partners who act with integrity. That is why I make sure that new business partners undergo our thorough vetting processes ahead of time and that all necessary internal stakeholders are involved. I never pick any business partner over another without having a legitimate reason; instead I make sure competition is fair.

Before making purchasing decisions, I learn about the market and possible alternative providers. I follow our Purchasing Guidelines and involve our Purchasing department early on. I make sure that we pay for only those services we actually receive, and that costs are fair and appropriate.

Example

You want to contract a new supplier for raw materials. Before the contract is signed, you conduct a comprehensive review. That includes, for example, financial checks (credit rating) or having the supplier sign our Code of Conduct for Business Partners. This due diligence ensures that the new supplier not only offers competitive pricing but also meets the ethical and legal standards of our own Code of Conduct.



27. PREVENTING MONEY LAUNDERING AND TERRORISM FINANCING

At Lorenz, we never tolerate money laundering or any form of terrorism financing. We therefore only work with reputable business partners who have been vetted against ethical and legal standards.

Money laundering means introducing money or assets from criminal activities into the legitimate economy in order to hide

their true origin. Financing terrorism means that money goes toward enabling or supporting terrorist activities.

Even unintentionally taking part in those actions can lead to serious financial and legal consequences for the company. That is why we carefully vet our business partners and distributors.

We match payments directly against the services rendered and make sure that all cash flows are properly documented and transparent—no rerouting or back channels. That protects our company and helps keep everyone safe.

MY CONTRIBUTION

I make sure that payments and business relationships are lawful, traceable, and properly documented. Before we enter into a new business relationship, I find out who we are dealing with, make sure the business partner is who they say they are, and check their data against applicable sanctions lists. Within my area of responsibility, I follow all applicable requirements for documenting transactions and contracts. If I notice unusual payments – for example, large cash payments over € 10,000 or a different process than we usually follow – I point them out openly. Such matters have to be checked and approved by the Finance department. If I am unsure, I ask my manager or Finance for help well ahead of time.

Example

A distributor has overpaid and asks us to send the refund to a foreign account or pay in cash instead of transferring it back to the original account.

Such a request needs an explanation. Do not simply agree to the proposal. Ask the distributor why the refund cannot be made in the same way as the original payment. Ask for help from the appropriate contact person in Finance.



28. COMPLYING WITH TAX AND CUSTOMS REGULATIONS

In over eighty countries around the world, we have customers who enjoy our brands and products. As an internationally active company, we realize our societal responsibility includes fulfilling our foreign trade, tax, and customs obligations, and we are committed to following national and international laws and agreements. We make sure all our business transactions are properly declared. We pay all required taxes and customs duties on time and in full.

In every country where we operate and trade, we always obey export control regulations and national import rules. That includes complying with sanctions lists and embargoes. We only work with partners who also follow these principles.

Because laws and regulations change frequently, we always keep our knowledge up to date—including about taxation, export control, and customs. If I am unsure, I get in touch with the relevant department.

MY CONTRIBUTION

I make sure that all taxes and customs duties are reported, declared, and paid accurately, fully, and on time to the appropriate authorities, and that our internal processes make that happen. I also get to know our company requirements. I use them to independently check and comply with the applicable regulations in my daily work.

I attend training sessions to keep my knowledge of tax, customs, and export control up to date, and I apply my knowledge thoroughly.

If I notice signs that foreign trade, tax, or customs regulations are being violated, I speak up openly. If I cannot resolve the problem myself, I get in touch with the appropriate contacts in Finance or our designated contact persons (page 25).

Example

You work in accounting or create purchase orders. Therefore, you are responsible for correctly recording all business transactions in accordance with legal/tax regulations and our company guidelines. That means making a clear distinction between operating expenses (OpEx – e.g. routine maintenance costs) and capital expenditures (CapEx – investments).

Building or buying new or used tangible assets (e.g. machinery or buildings) is usually an investment. Please note that an expansion or a significant improvement that goes beyond the original condition of existing assets also has to be capitalized as an investment (meaning entered in the company's balance sheet). If you are unsure whether a project counts as an operating expense (OpEx) or as an investment (CapEx), please talk to the fixed asset accounting department before proceeding. Wrongly recording an investment as an expense violates legal/tax requirements and is not allowed.

Always code and post business transactions in accordance with legal requirements and applicable accounting standards in accordance with legal requirements and applicable accounting standards (Local GAAP). Because our tax returns and tax assessments are based on our bookkeeping system, all business transactions must be recorded in the bookkeeping system according to statutory regulations. Errors in accounting not only distort our balance sheets but also lead to incorrect tax filings and serious consequences for the company and the responsible employees.



29. ACCOUNTING AND REPORTING ACCURATELY

We always comply with all legal requirements for proper bookkeeping and financial reporting. Completeness and accuracy are our top priorities, because irregularities can have serious consequences for our company and for individuals.

Our careful and complete documentation is the foundation of proper bookkeeping and reliable reporting. Every employee is responsible for recording business transactions accurately and completely.

Any time we give information to others, such as authorities, banks, oversight bodies, or the public, that information – whether in speech or in writing – has to be correct, clear, and timely, and has to contain the relevant facts.

MY CONTRIBUTION

I understand that the accuracy and integrity of our financial records are essential for our company's success and credibility. That is why I commit to fulfilling all my responsibilities diligently and correctly. I organize processes to make sure all business transactions can be recorded accurately and on time in our bookkeeping system. If I have questions, I get in touch with the Finance department.

Example

You work in Logistics and are responsible for receiving goods. While unloading a delivery, you notice that the delivery note lists fifty pallets, but you count only forty-eight, two of which are damaged. Instead of recording the delivery as complete, you mark the delivery note with the exact number and the damage, update the data in our system (for example, SAP), and then call the supplier to find out why goods were missing and damaged.

By doing so, you make sure that Accounting automatically gets the correct data for checking the invoice, that Logistics can resolve the discrepancies and damage with the supplier, and that we are protected against financial and legal problems.



30. DEALING TRANSPARENTLY WITH PUBLIC OFFICIALS AND ELECTED REPRESENTATIVES

Transparency is our top priority when we interact with public officials or elected representatives from government and public administration*. We do business with integrity and comply strictly with all applicable laws and anti-corruption regulations, both nationally and internationally.

All of the following are strictly forbidden:

- Bribery of any kind
- Illegal payments such as “lubrication fees” or kickbacks (meaning payments made so routine governmental actions are completed faster)
- Giving unlawful benefits to public officials or their relatives.

We are especially careful about gifts or invitations to public officials or their relatives. Those are illegal in almost all countries, so we do not allow them. If you have any questions or are unsure, get in touch with Compliance.

There are special rules for interacting with the authorities. Inquiries from the government or other authorities must be documented and forwarded immediately to the responsible department (for example, Quality Management, Plant Management, Finance, or the Legal Department).

In addition, if any of our activities requires an official permit, we do not proceed until we have the permit. If a permit for an activity expires or is withdrawn, we stop that activity immediately until lawful approval is restored.

MY CONTRIBUTION

I understand that dealings with public officials and elected representatives have a higher risk of corruption, and I get to know any special rules that apply. If I get a question or need a permit from the authorities, I involve the responsible department early on (for example, Quality Management, Plant Management, Finance, or Legal). If I am unsure, I get in touch with Compliance or the Management Team. I make sure that we do not take action until we have all necessary permits.

Example

Along with other guests, a university professor is invited to give a specialist lecture at an all-day event. You think about what issues you need to keep in mind. Among other things, your department wants to invite all guests to lunch. Because particularly strict rules apply to benefits given to elected representatives or public officials – including appointed professors at state universities – you talk to Compliance ahead of time.

*Public officials and elected representatives include, for example, civil servants; employees of a ministry, regulatory authority, or municipal administrations; members of parliament or local councils—that is, anyone who performs state functions or holds political responsibility. Employees of state-owned businesses or public educational institutions (like schools or universities) may also be in this category.

LORENZ LIVING OUR VALUES TOGETHER: SUPPORT & GUIDANCE



Our Code of Conduct is more than just a set of rules. It is our shared compass for building trust and acting responsibly within the Lorenz Group. It guides and protects us in our everyday work. That is why it is important that we all know, understand, and apply it.

Each of us is responsible for complying with the Code of Conduct in our day-to-day activities. That is how we can prevent misconduct and protect not just our company, but also us as employees from possible legal consequences.

We believe: we're all human, and everybody makes mistakes. The most important part is that we talk about them honestly, learn from them, and grow together. We want to keep up a culture of trust, where we support and learn from one another rather than policing each other.

To make that work, we offer help to all our employees. This chapter will tell you who you can turn to, what we expect from one another, and how we work together to make sure our principles are put into practice every day.

DECISION-MAKING SUPPORT IN CASE OF UNCERTAINTIES

Sometimes the right course of action is not obvious. That is when the following questions can help you make a good decision:

- Does my decision comply with the law, our corporate values, and internal policies?
- Can I justify this decision honestly in front of colleagues and managers?
- Would it be fine if this decision were made the same way throughout the entire company?
- Would I stand by this decision if it became public?
- Would I agree with this decision if I were personally affected?

If you are unsure about any of these questions or have doubts, talk to a colleague you trust, your team, your manager, or one of the designated contact persons. Together, we can figure out the right approach.

If you answered “no” to one or more of these questions, get in touch with one of our contact persons immediately. Remember: anyone can make a mistake. They are opportunities to learn and improve. What matters is how we deal with them.

Regardless of whether you are still unsure, the following contact persons can help. Your concern will always be treated confidentially.

However, if we have evidence of serious or intentional misconduct or violations, all of us are obligated to report it through Tell us! – to protect ourselves and the company. More information about the obligation to report serious violations can be found below.

LOCAL CONTACT PERSONS

Many questions or concerns can be resolved by talking directly to people on site – for example, to the people involved or to workplace acquaintances.

If you are looking for advice, have questions about the Code of Conduct, or want to bring up minor violations or suggestions for improvement, you can get in touch with:

- Your manager or local leadership
- On-site experts, for example in People & Culture, Quality Management, or Finance
- Occupational safety officers for your area
- Local employee representatives, such as workers councils (where applicable)

These contact persons will help you find constructive solutions and make sure that questions or minor issues are addressed quickly and confidentially.

COMPANY-WIDE CONTACTS

If you prefer not to bring up your concern locally or cannot find the right support there, you can get in touch with our company-wide contacts at any time. We carefully check up on any reported concerns regarding possible misconduct. You can talk directly to the contact persons or departments listed below or report your concerns through our Tell us! whistleblowing portal (including anonymously, if needed).

Direct contact with company-wide departments – get in touch for professional guidance or support:

- Compliance International
- People & Culture International
- Tell us! Officers

TELL US! THE LORENZ WHISTLEBLOWING PORTAL

For situations where you cannot or would rather not talk directly to someone within the company, we have our Tell us! whistleblowing portal. It can be used to report problems confidentially to a company-wide office – anonymously, if needed. The portal is available online in multiple languages and has special encryption for exchanging secure messages with our Tell us! Officers. We check up on every report, and handle all information and follow-up activities with strict confidentiality.

A serious violation means the ethical principles set out in our Code of Conduct are significantly breached, a law is broken, or actions severely endanger the company's reputation or financial interests. Such violations have to be documented through Tell us! If you are unsure whether a situation qualifies, ask for help from the company-wide contacts listed above.

If we know or suspect that applicable laws or our Code of Conduct are being violated in or around our company, looking away is not an option: we have to report the breach. Every good-faith report helps us quickly resolve situations, stop misconduct, and protect both our employees and the company from risks.

No whistleblower will ever suffer negative consequences, unless they themselves have violated the law. Meanwhile, the whistleblowing portal safeguards the rights of all people involved. Before a violation is proven, they are treated as innocent until proven guilty. Our whistleblowing portal is built on standardized processes and the confidential, thorough handling of all reports. Never use the portal to submit allegations or information that you know are wrong. Anyone who makes a report in good faith has nothing to fear.

The Tell us! whistleblowing portal can be reached through the following channels:

Online: <https://www.bkms-system.com/lorenz>



Notes:

- Make sure you use a secure internet connection. A good clue is if your browser address line starts with “https.”
- When reporting, do not use a company device (PC or cell phone) your employer has given you.
- If possible, go directly to the Tell us! server (supported by EQS Integrity Line) by copying the link/URL directly into a new browser window. Accessing the portal directly from the intranet may limit your anonymity.

In person:

Please schedule appointments ahead of time in the Tell us! portal or by email: Tell-us@lorenz-snacks.com

OBLIGATION TO REPORT SEVERE MISCONDUCT

Some employees, like managers, have a special duty to ensure compliance because of their role or level of responsibility. Those employees are required to report specific clues, evidence, or suspicion of a serious violation or a corresponding initial suspicion immediately to the company-wide contacts or through the Tell us! whistleblowing portal.

All other employees are also encouraged to report any indications of possible serious misconduct.

Here are just a few examples of serious violations or misconduct:

- Breaking applicable laws such as competition laws, foreign trade laws, data protection regulations, or food safety regulations
- Committing or tolerating economic or financial crimes such as fraud, breach of trust, theft, embezzlement, or corruption
- Violating human rights, allowing or committing sexual harassment, or violating equal treatment and anti-discrimination laws
- Violating regulations that protect life, physical safety, health, or the rights of employees or their representatives
- Violating our internal guidelines, such as our AI policy

If you are unsure whether a specific case is a serious violation that has to be reported, get in touch with one of the company-wide contacts listed above.

PUBLISHING INFORMATION

Translation Note: This document is a translation of the original English text and is provided for informational purposes only. In the event of any discrepancies or inconsistencies, the original English version of the Code of Conduct shall prevail and is exclusively legally binding.



IMPRINT

Publisher: Leithart Holding GmbH
Bahnhofstraße 34 | 9020 Klagenfurt, Österreich
Responsible department: Compliance International
Last reviewed: January 2026 (Version 3.0)
Next review: every 2 years
Layout & typesetting: Rouba Kreation, Rösraht

Lorenz

