

DISTRIBUTOR CODE OF CONDUCT



The **Roquette Distributor Code of Conduct** sets forth the **minimum requirements and expectations** with respect to compliance with **laws and acceptable business conduct for Roquette's distributors**.

The requirements and expectations set forth in this Code apply to all Roquette distributors, **regardless of where the distributor is based or does business**. The distributor also shall comply with applicable **local laws, directives and regulations**.

Distributors are also encouraged to **introduce policies, standards, procedures or codes that are stricter than these requirements and expectations**.

We at Roquette understand that our success is not based solely on quality products, but also on **premier customer experience, business integrity, compliance and responsible conduct**. These principles are expected not only from our employees, but also from **our Distributors**.

By committing to following these principles together, Roquette and its Distributors will ensure **they share the same ethical values and professionalism**, which are the first key step to a **long-term relationship and sustainable growth**.

Gaëtan Fauvarque

Head of Global Distribution



Preamble

This **Distributor Code of Conduct** is based on the **Universal Declaration of Human Rights**, the principles of the **United Nations Global Compact and the conventions of the International Labor Organization (ILO)**, the principles laid down by the **Ethical Trading Initiative (ETI)** as well as **Roquette's Code of Conduct**¹. It does not serve as a substitute for the various regulations, standards and current applicable laws in the different countries.

Roquette is at the **forefront of compliance in all countries** where the Roquette group operates. Roquette is committed to abiding by the **UK Modern Slavery Act of 2015** and other similar national laws and regulations.

Distributors commit to **respect these regulations, standards and laws** in the countries where they carry out their activity or/and as applicable.

When a Distributor performs services for a Roquette entity, it commits to **abide by this Distributor Code of Conduct**, and to guarantee that these, or equivalent principles, are **known and followed by their own subcontractors**. This is the first step of the approval process before any business relationship with a Roquette entity can be started.

¹ Available on www.roquette.com

Our Values

An organization's culture lies in its **core values**. Values that describe who we are, how we engage with our stakeholders, and how we contribute to our society.



We are a **family-owned company** guided by a strong sense of purpose. We are **authentic people**, we stay true to our commitments and we **act with transparency**.

Our values are the foundation of our success and essential to achieving our mission to better feed people and treat patients while taking care of the planet.

Roquette's story is a **human and family adventure** that began almost a century ago. Since then, thousands of men and women, driven by a unique vision, have committed themselves to provide people with the food, nutrition and health they need according to their lifestyle choices, their age, where they live and what they do.

All over the world, **talents from different origins, skills and backgrounds** have come together at Roquette to **unlock the potential of nature** and contribute to building a healthier future.

At Roquette, we **embody our 4 values in everything we do.**

We base our culture on:

AUTHENTICITY

FORWARD-LOOKING

EXCELLENCE

WELL-BEING

Authenticity: We are genuine people, we are true to our commitments and act honestly and responsibly.

Excellence: We are a group of committed people; every day we do better and go further to meet customers and consumers expectations.

Forward-looking: We rely on our family heritage and long-term vision to constantly explore, collaborate, and innovate. This is crucial to continuously address and anticipate our customers' needs.

Well-being: We improve well-being by enhancing everyday products, while taking care of resources, territories, and communities. We are committed to fostering an easy and enjoyable working environment and customer experience.

Our consumers and customers trust us **for doing business with honesty and integrity.** Trust is one of our greatest assets and requires the **highest standards** of behavior every day.

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HUMAN RIGHTS, LABOR & SAFETY & HEALTH AT WORK



Distributors shall **prohibit forced labor and child labor** in compliance with, among others, the **fundamental ILO conventions**.

Distributors must **combat all types of abuse, violence, discrimination or harassment**, in particular discrimination tied to color, race, sex, sexual orientation, age, ethical affiliation, origin, family situation, religion, disability or any other characteristic that is protected by law, and promote equal opportunity among employees.

Distributors must **respect freedom of association and the right to collective bargaining** for employees, in compliance with applicable laws and international standards.

Distributors shall **provide working and remuneration conditions** that are dignified and in compliance with applicable laws and international standards.

Distributors shall provide a work environment that promotes **health, safety and security**.

It is imperative for Distributors to abide by the **Roquette rules for hygiene, health and safety** during all interventions at Group sites as such rules are provided to them.

FOOD FRAUD PREVENTION



Distributors in the food or feed activity should carry out a **risk assessment of their activity**, **implement a feed/food fraud policy** and ensure this policy is **properly implemented** by themselves, within their group, or by their subcontractors.

ENVIRONMENT AND SUSTAINABILITY

Distributors' adoption of **sustainable practices** plays a critical role for Roquette and Roquette supports and encourages sustainability among its Distributors.



Applicable **environmental laws and regulations** shall be implemented by Distributors and the adoption of global standard such as ISO 14001 is encouraged. Also, **Energy reduction plans** are encouraged as well as activities that contribute to i) the **growth and development of the international and local communities**, ii) ensuring precious global resources such as water and agricultural products for future generations.

Distributors should limit as much as possible the impact of their activities on the environment for instance by **reducing or recycling waste** as much as possible or reducing greenhouse gas emissions.

PRODUCT QUALITY AND SAFETY



Distributors must follow high **quality and product safety standards**. Products, ingredients and services delivered shall meet specifications as agreed by both a Roquette entity and Distributors and comply with all applicable laws and regulations.

Roquette expects Distributors to report immediately any concerns they may have regarding **product safety or quality**.

FREE COMPETITION

It is imperative for Distributors to comply with rules related **to free competition**. Distributors must commit to competition based on price, quality and services, and only seek competitive, advantage through lawful means.



Roquette believes in **free and open competition** and fully adheres to the **antitrust and competition laws in every country where we do business**. Distributors shall not misrepresent the characteristics of Roquette products or services, act dishonestly, or engage in any other unfair or anticompetitive practices. Distributors should avoid creating even the appearance of improper conduct. Distributors are required to comply with all applicable antitrust and competition laws and regulations.

Robust and fair competition practices include:

- Bidding independently from competitors;
- Not discussing bidding practices with competitors;
- Not entering into agreements, coordinated practices, or understandings that could restrict competition;
- Not exchanging sensitive information with competitors (including pricing, costs, production data, market data, sales territories, distribution channels, customer lists, or other non-public business information);
- Only gathering information about competitors using means that are ethical and legal;
- Not exchanging sensitive information between the Distributor and Roquette (including pricing per client);
- Only using permitted information in compliance with the General Distribution Agreement and in accordance with the Confidentiality requirements described below (page 13).

CORRUPTION, FRAUD AND CONFLICT OF INTEREST



Roquette has a **zero-tolerance policy with respect to corruption and fraud**. **Distributors must prevent and reject all types of corruption**, including extortion and kickbacks. Infringement of the laws related to corruption, extortion, conflicts of interest and fraud may lead to commercial, financial, administrative or penal sanctions.

Distributors **shall not directly or indirectly offer or receive gifts, invitations** or other advantages beyond a reasonable limit and in compliance with legal limits. These advantages must in no way influence or appear to influence a decision. Invitations and other advantages are prohibited during a call for tender.

Symbolic advertising gifts may be accepted once a year.

Monetary gifts (cash, checks, transfers, etc.) **are strictly prohibited.** In case of doubt concerning the reasonable value of a gift or invitation, its acceptance will be subject to agreement by the Roquette Account Manager.

Conflicts of interest: When a Distributor has a **direct or indirect personal interest** or personal relationship with an employee or a shareholder of a Roquette entity, a member of the Roquette it should inform by the Roquette Account Manager.

PROHIBITION OF MONEY-LAUNDERING

Money-laundering can occur where an action is taken to **mask the true origin of money or assets that are connected to criminal activity.**



Roquette requires its Distributors to commit to taking **all appropriate measures to prevent their operations from being used in relation to money-laundering activities.**

CUSTOMS AND SECURITY AUTHORITIES



Distributors are required to **comply with applicable customs laws**, including those relating to **imports** and **the ban on transshipment of merchandise** to the importing country.

TRADE RESTRICTIONS AND INTERNATIONAL SANCTIONS

Our Distributors must **respect international trade restrictions and sanctions**, taking into account any changes in these measures, as well as all **laws and regulations concerning export controls**.



The Distributor **shall promptly notify Roquette** if it becomes aware of any **actual or potential breach** of any international trade restrictions and sanctions concerning any of Roquette's products.

CONFIDENTIALITY



Roquette may send you document with different classification: **PUBLIC**, **ROQUETTE RESTRICTED** or **ROQUETTE CONFIDENTIAL**.

Any document coming from Roquette with no marking has to be considered as a **ROQUETTE RESTRICTED** document.

Please consider for each classification the following security requirements:

For **PUBLIC** classification:

- Do not remove or change the mention of the classification.

For **ROQUETTE RESTRICTED** classification:

- Do not remove or change the mention of the classification and the number of each page.
- Only those, individuals or groups, internal or external, who “need to know” can have access to **ROQUETTE RESTRICTED** information.
- Anomalies during transport (loss/disclosure) must be reported to Roquette immediately.

- No specific protection is required on printing, copy and sharing **ROQUETTE RESTRICTED**. However, care should always be taken to use **ROQUETTE RESTRICTED** information appropriately, according to the "need to know" principle.
- Enclose **ROQUETTE RESTRICTED** document in office cabinet is mandatory.
- For destruction, crosscut shredder is mandatory for printed documents. Destruction has to be done by the distributors (no subcontractors).

For **ROQUETTE CONFIDENTIAL** classification:

- Do not remove or change the mention of the classification, the number for each page, the name and the position of the people mentioned in the document (Annex of the document).
- Only those, individuals or groups, internal or external, who “need to know”, can have access to **ROQUETTE CONFIDENTIAL** information. The list of people, individuals or groups, internal or external who have access to **ROQUETTE CONFIDENTIAL** information is defined in an annex attached to the document.
- Transport/Transmission of printed **ROQUETTE CONFIDENTIAL** information must be avoided as much as possible.
- Transport/Transmission of digital **ROQUETTE CONFIDENTIAL** information on an external storage must be avoided as much as possible. When the transport is required, an encrypted support is mandatory.
- Transport/Transmission of physical **ROQUETTE CONFIDENTIAL** information cannot go through untracked delivery methods. Internal mail and regular postal services are not tracked delivery methods.

- Anomalies during transport (loss / disclosure) must be reported to Roquette without any delay.
- Copying or printing **ROQUETTE CONFIDENTIAL** document is allowed only by Roquette.
- Sharing **ROQUETTE CONFIDENTIAL** information is submitted to need to know principle. It must be allowed by Roquette who will consequently update the Annex.
- Printing a **ROQUETTE CONFIDENTIAL** document must be done on a color printer.
- For storage, enclose in a key-locked wardrobe or in a safe in a secure location is mandatory.
- Printed **ROQUETTE CONFIDENTIAL** information should not be stored off-Roquette facilities unless the user is specifically authorized to do so by Roquette.
- Any printed **ROQUETTE CONFIDENTIAL** document has to be sent back to Roquette after use. Roquette will ensure the destruction.

IT SECURITY, PRIVACY AND DATA PROTECTION



Distributors must comply with their obligations under **applicable data protection laws**, associated regulatory requirements and policies on the **right to privacy and information security** at Roquette when personal data is collected, stored, processed, used or transferred.

In case of doubt, Distributors should contact either their own **Data Protection Officer** (DPO) or Roquette's DPO at dpo@roquette.com .

To exercise your rights as a data subject, you can use [this form](#) available on www.roquette.com/Data-Protection .

In case of data breach, suppliers should fill in [this form](#).

COMPUTER NETWORK THREATS

Distributors should **implement measures in order to protect their computer networks** against security threats.



CHECKS AND APPLICATION



Awareness, formal acceptance and respect of the **Distributor Code of Conduct** are part of i) the criteria for evaluating and referencing Roquette Distributors, and ii) their contractual obligations.

Roquette may carry out **checks or audits of Distributors**, either directly or through an organism delegated by the company, which Distributors agree with.

REPORTING CONCERNS

If Distributors are **aware or suspect behaviors** that are **contrary to the principles** listed in this code, the same should be brought to Roquette's attention by **notifying the Roquette Account Manager** or using **SpeakUp®**.



<https://roquette.speakup.report/en-GB/RoquetteSpeakUpline/home>

A Distributors working with a Roquette entity accepts that failing to comply with this Distributor Code of Conduct is a sufficient ground for Roquette to end any commercial relationship with this Distributor.





ROQUETTE

Offering the best of nature™

