Code of Conduct for Employees



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Foreword

As an internationally active family-owned company, Münzer stands for responsible conduct, long-term partnerships and a value-based corporate culture. The foundations of our success are not only innovative solutions and efficient processes. Rather, it is our employees, their daily actions and, of course, their long-term decisions.

With this **Code of Conduct** for Employees, we provide a binding framework of guidelines to guide us in our daily work – both within the company and in our dealings with business partners, authorities and the public. This Code describes our shared core values. It provides clarity on key issues such as **integrity, human rights, equality, anticorruption** and **transparency**, and sets out what we as a company expect from each and every individual.

Ethical behaviour, compliance with legal requirements and respectful interaction with one another are non-negotiable for us. We firmly oppose any form of discrimination, abuse of power or lack of transparency. As an international company, it goes without saying that our values and actions are the same for everyone – regardless of cultural background, individual lifestyle or geographical origin. At the same time, we promote diversity, fairness and equal treatment in all areas of our company.

This Code of Conduct applies to all employees, regardless of their position, department or place of work. It is not just a set of rules, but rather a living expression of our shared understanding of responsible cooperation. Each and every one of us contributes to maintaining the trust that our customers, partners and society place in us.

This Code of Conduct should be read carefully and integrated into day-to-day work. For any questions or concerns, the relevant management and the compliance officers at Münzer Bioindustrie GmbH are available to provide guidance at any time.

Responsibility begins with each and every one of us. Together, we create trust and integrity – worldwide.
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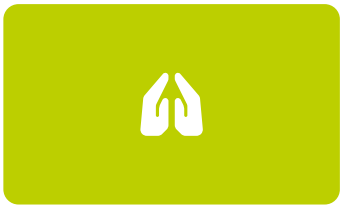
Strong values

One name. One family. One company. Since 1991, the name Münzer has stood for the continuity of an owner-managed conglomerate and for and for responsible business conduct.

Our company is one big family. We have core values that guide our daily lives and work. We strive to live by these convictions and virtues every day.



Family



Faith



Humility



Honesty



Carefulness



Gratefulness



Friendship



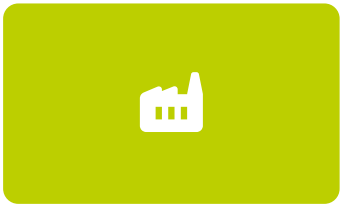
Personal relationship



Responsibility



Kindness



Reliability



Solidarity

Purpose

The values and regulations contained in this Code of Conduct form the central set of rules governing Münzer's actions and are based on our commitment to the following international regulations: the International Bill of Human Rights, the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights, and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.

Scope

This Code of Conduct applies to all subsidiaries of Münzer Holding GmbH (hereinafter referred to as „Münzer"). All individuals working for Münzer – including employees, freelancers, agency workers and management – are obliged to comply with this Code. This Code therefore also contains certain ongoing obligations that remain in force for these individuals even after they leave the company. These include, among other things, the obligation to maintain confidentiality with regard to all trade and business secrets.

Application of this Code of Conduct

Our world has become more complex, and so have our decision-making processes. In every situation, we are required to evaluate the decisions to be made on an individual basis. Our Code of Conduct provides a compass for how best to approach these decisions in the best interests of the company.

- ✓ Am I making decisions in line with the company's values?
- ✓ Am I sufficiently informed to make the right decision?
- ✓ Have I considered all options and alternatives?
- ✓ Am I familiar with all legal requirements and am I acting in accordance with these principles?
- ✓ Can I sufficiently justify or defend my actions to the relevant authorities?
- ✓ Am I acting in the interests of the company or is there a biased motivation behind my actions?
- ✓ Can I defend my actions and decisions with a clear conscience?

Our employees are expected to always act responsibly and make decisions accordingly. Intentional disregard or violation of this code is prohibited, as is encouraging others to behave inappropriately. This also includes the obligation to immediately report any attempts at fraud or possible violations of laws and regulatory requirements to the manager responsible.

The management guarantees that employees who report incidents in good faith will not suffer any disadvantages as a result. Accordingly, retaliatory measures or discrediting behaviour will not be tolerated. It is the express duty of every manager to ensure a working environment that is characterised by openness and honesty and free from disparaging behaviour.

Environmental and climate protection

„Energy from waste" – this motto is both our motivation and our commitment. For Münzer, environmental and climate protection means more than just complying with legal requirements. It is our declared goal to make a contribution to reducing greenhouse gas emissions in our areas of influence, through our products and services, but also through our business activities and processes. This also means that we evaluate and implement specific measures to reduce energy and resource consumption, emissions, and waste generation in our internal processes, production and processing steps, and supply and logistics chains.

We strive to use energy, water and raw materials sparingly and efficiently. The use of renewable energies is being systematically expanded.

Circular economy

One key area of our activities is the production of BioDiesel. Within the scope of technical and legal possibilities, we use suitable waste and residual materials, including processed used cooking oil, as raw materials. These material streams are thereby put to further use and used in the production of BioDiesel, which can partially replace fossil diesel fuel. The separate collection of these materials also enables them to be returned to the raw material cycle.

Furthermore, we are subject to the strictest legal requirements in all our business activities, which we comply with to the best of our knowledge and belief. In the field of waste management in particular, it is therefore especially important to us to keep our employees up to date with the latest legal requirements.



Human rights and fair cooperation

Münzer is committed to respecting internationally recognised human rights, which, as fundamental values, form the basis for fair cooperation and a respectful working environment, thereby shaping our corporate culture.

Working conditions

We are committed to complying with all labour law and social security regulations in relation to minimum wages, social benefits, working hours and overtime. Working hours and rest periods must be organised in accordance with the law, and clear, fair working conditions must be established and set out in writing in an employment contract in a language that is easy to understand.

Fundamental rights

Freedom of association and the right of employees to organise themselves in trade unions or other employee representative bodies and to conduct collective bargaining must be respected. The decision on membership must be free from discrimination, pressure or reprisals. Employee representatives must be given appropriate access to the workplace.

Any form of child labour, forced labour, compulsory labour, illegal employment, modern slavery and human trafficking is strictly prohibited. This includes the prohibition of withholding identity documents, demanding money or valuables as security, making wage deductions in connection with recruitment or migration, or unlawfully making it difficult to terminate the employment relationship.

The employment of minors below the applicable legal minimum age is not permitted. We ensure that young people under the age of 18 do not perform any hazardous work. Minors must not be impaired in any way in their physical, mental or social development as a result of their work.

Respect and mutual respect

Mutual respect creates trust and thus the basis for good cooperation. We therefore promote an environment in which all employees treat each other with respect and recognition, in which potential is developed and mutual assistance is a matter of course.

Discrimination and harassment (e.g. based on gender, ethnic or social origin, skin colour, nationality, religion or belief, political or other opinion, age, sexual orientation, or disability) have no place in our family business. Any form of discrimination, harassment or intimidation will not be tolerated or excused by the management. Any threats or acts of violence, whether in the office or in other work-related circumstances, must therefore be reported immediately and will be severely sanctioned.

Fairness

A family business goes beyond mere compliance with labour and social laws. We aspire to be a company where fair employment conditions and mutual respect ensure that our employees not only enjoy working at Münzer but also recommend our company to others.

We want to offer opportunities to further develop, to achieve a healthy work-life balance, and to realise one's own potential. Looking beyond the horizon is particularly important to us. The willingness to perform for one's own team, but also for other areas of the company, is key here.

We therefore want to encourage proactive engagement and action. To this end, it is important to have good judgement. This applies not only to managers, but to every single employee. All employees are encouraged to contribute their professional opinions or judgements.

Safety in the workplace

Health and safety are top priorities for Münzer. We are committed to strictly complying with the applicable legal regulations on occupational safety and health protection. The aim is to create safe working conditions, identify and avoid risks at an early stage, and prevent accidents and work-related illnesses.

From the executive management to every single person in the company, everyone is responsible for implementing and further developing high standards in the areas of safety and health. Münzer provides suitable personal protective equipment, regular training and effective information measures for this purpose. All relevant safety regulations are continuously updated and made available to employees. In addition, new employees receive comprehensive training when they join the company.

In areas with increased risk potential, such as production or laboratories, the wearing of specific protective clothing is mandatory. All employees are also required to report potentially dangerous situations or near accidents immediately. The findings are incorporated into preventive measures and promote the continuous improvement of occupational safety.

Münzer expects all employees to comply with internal safety regulations, behave responsibly in their day-to-day work and actively participate in hazard prevention.



Ethical business practices

Compliance with laws

It goes without saying that we comply with all applicable laws and regulations. We therefore ensure that all employees are familiar with the regulatory requirements applicable to their tasks. Managers are therefore required to inform themselves about the laws and regulations applicable to their tasks and to communicate this information to others.

Tax compliance

In the course of our business activities, we comply with applicable tax laws and contribute to the economies of the countries in which we operate by paying taxes. Our employees must therefore avoid any practices that could lead to illegal tax avoidance.

Cooperation with authorities

We operate in an environment which is highly regulated by law. An open, productive and cooperative relationship with the various administrative authorities is very important to us. It is therefore clear that we will cooperate fully in the event of investigations, enquiries or audits.

Transparency

The regulatory framework for our services and the politically exposed position of our products naturally requires us to present our positions and opinions to the relevant stakeholders, especially during the drafting of laws and regulations.

Competition

Our company competes both nationally and internationally. We are committed to fair competition in all our business activities. Compliance with applicable competition and antitrust laws is a top priority for our employees. We do not engage in any activities that restrict fair competition. We do not enter into agreements with competitors and do not pass on any information that could restrict fair competition.

Münzer is represented in industry associations both nationally and internationally. We also hold board positions in these associations. It is therefore essential for the management, but also for every employee, to have a comprehensive view of the respective industry in order to act in the interests of all industry participants in these associations.

Combating corruption

Münzer pursues a zero-tolerance policy towards corruption in all business dealings and transactions in all countries where the company operates. Combating corruption is a central concern and a direct task and responsibility of the management. Accordingly, the company undertakes to comply fully with all applicable anti-corruption laws.

A company that places great emphasis on trust must combat corruption in all its forms, wherever it occurs.

Bribery

Bribery or other corrupt practices, whether on the part of employees or suppliers or other stakeholders with whom we have a business relationship, are unacceptable.

Bribery can take many forms. Therefore, it is often difficult to recognise bribery immediately, regardless of whether you are in an active or passive role. This makes it all the more important to act with particular caution and sensitivity. Any involvement in activities where there is suspicion of corruption must be firmly rejected and reported to management immediately. This includes, for example, accepting or offering payments and services. Gifts or donations may also fall under this definition.

In addition to the clear criminal prohibition of bribery or attempted bribery of public officials, such as mayors, members of government or judges, the same acts are also criminally prohibited between persons in a business context.

Acceptance of gifts

The acceptance of gifts, regardless of their value

- ✓ in return for performing or refraining from performing an act and/or
- ✓ with the intention of influencing, i.e. jeopardising professional independence,

is prohibited under any circumstances. Furthermore, cash or cash equivalents may not be offered or accepted if these criteria are met.

Gifts and invitations may only be accepted or offered if they are appropriate to the circumstances and social customs. Our company has clear guidelines and value limits that must be strictly observed by all employees.

Anti-Money Laundering

All laws designed to prevent money laundering and terrorist financing must be strictly observed by our employees.

Money laundering refers to the process by which illegally or dishonestly acquired assets are introduced into the legal economy in order to conceal their criminal origin. The aim is to conceal the true origin, legal ownership or actual intended use of the money and to make it appear as if it has been obtained legally.

Our company condemns all forms of money laundering and is actively committed to combating and preventing the concealment of the origin, ownership and use of assets.

Economic sanctions

We ensure that natural or legal persons subject to sanctions (e.g. by the European Union or the United Nations) are not accepted as business partners. In addition, Münzer undertakes to act in accordance with the applicable international sanctions regulations. Business activities involving goods subject to sanctions or embargoes require thorough examination. They are only permitted in strict compliance with the applicable legal regulations on sanctions and embargoes.

Lobbying

We understand lobbying activities as an active exchange with our stakeholders. This includes providing information, presenting arguments and mediating in order to represent the interests of Münzer. In doing so, we comply with applicable national and international laws as well as our own company guidelines. It goes without saying that all activities are carried out in a fair, transparent and professional manner. Respect for the fundamental principles of democracy is the basis of our actions.

Professionalism

All lobbying activities are conducted in a fair and professional manner and are guided by high ethical and moral standards. Improper conduct is not permitted.

Legal provisions

All lobbying activities are carried out in accordance with legal provisions and internal company guidelines. Only designated employees who are registered in official transparency registers, such as that of the European Union, are permitted to engage in lobbying.

Sincerity

It is prohibited to obtain information in an unfair manner or to attempt to do so. Only socially acceptable and lawful activities will be undertaken to give appropriate weight to the representation of interests. The exertion of pressure on office holders is strictly prohibited.

Honesty

Our lobbyists openly disclose their lobbying activities, the employer they represent and the issues they are working on. In doing so, we provide officials and other interested parties with truthful and up-to-date information. Misleading representations of facts are prohibited.

Integrity and confidentiality

Our lobbying activities are conducted with the appropriate integrity. All confidential information received is treated as such and will not be disclosed or used for any other purpose.

The duty of confidentiality may be waived either with the express written consent of the management or on the basis of a legal disclosure obligation.

Conflicts of interest

Actions that expose office holders to a conflict of interest must be avoided. This is particularly the case if there is a risk that office holders could be influenced in the impartial performance of their duties.

Lobbyists working for Münzer must inform themselves of the relevant incompatibility provisions applicable to office holders, insofar as these have been made public, and must respect them.



Corporate Communications

General communication

Any official comments to the media, business partners or other stakeholders, in whatever form, may only be made by appropriately authorised personnel.

No official and public statements may be made on behalf of the company without the prior approval of the management or the head of the Corporate Communications & Public Relations department.

Use of social media

We are aware that our employees use various social media and networks for private purposes. However, the use of such tools must be in accordance with the law and the values of the company. In addition, it must be ensured that outsiders do not get the impression that private statements of any kind reflect the views of the company. This applies in particular if a reference to Münzer is made on the profile in question, for example by stating the company as the employer.

The reputation of the company and the right of others to privacy must be protected at all times.



Sponsorship and donations

As a family-owned company, we have a responsibility not only to our employees, but also to the society in which we operate as an active stakeholder.

We therefore make various donations and sponsorships, which we see as an investment in the community. Sponsorship is a partnership in which a sponsor provides financial or non-financial support in return for advertising benefits and brand exposure. In contrast, a donation is a voluntary contribution made without any expectation of something in return.

Data protection

Data protection and professional confidentiality are of paramount importance to our company. Data protection is the basis for trust. We therefore take great care to protect all data relating to our stakeholders, both internally and externally, and comply with the EU General Data Protection Regulation (GDPR) and applicable national laws. Disclosure will only be made if required by law.

Conflicts of interest

Conflicts of interest can significantly impair the integrity and fairness of business conduct. It is therefore of utmost importance to Münzer that potential or actual conflicts of interest are identified at an early stage, disclosed and consistently avoided.

All employees are obliged to ensure that their private or financial interests do not conflict with their professional duties towards Münzer. Situations that are or appear to be incompatible with the interests of the company – in particular in the case of existing economic, financial or personal ties – must be reported immediately to the responsible department.

A trusting and transparent corporate culture forms the basis for responsible conduct and sustainable corporate success.



Our responsibility towards our customers

Quality

We only offer our products and services if we are absolutely certain that we have the necessary legal licences and expertise. We also only provide our services if we have the necessary infrastructure.

Fairness

Integrity and fairness are at the beginning of every customer relationship. We comply with all applicable legal and regulatory obligations with regard to customer protection. We treat all people equally and with respect. We therefore strictly adhere to the agreements we make with our customers, partners and service providers.



Whistleblower system

If employees become aware of actual or potential violations of the obligations set out in this Code of Conduct or within the value chain, they should have the opportunity to inform Münzer.

For this purpose, Münzer has set up a **whistleblower system** through which reports can be submitted. There are situations in which it may be difficult or uncomfortable to address concerns or possible violations directly. In such cases, a report can be made anonymously via our whistleblower system. All reports will be treated confidentially and the identity of the reporting person will remain protected.

Reports can be submitted in the following ways:

- ✓ **Online via whistleblower system**
- ✓ **By email to: compliance@muenzer.com**

We are committed to providing all employees, partners and communities with whom they interact through secure and accessible channels through which concerns and reports can be submitted, including anonymously. There is an explicit prohibition on retaliation against individuals who report in good faith. At the same time, we reserve

the right to take action against individuals who knowingly make false reports. Any concerns or violations of the Code of Conduct and our guidelines will be taken seriously. They will be carefully investigated, regardless of the persons involved. We encourage all employees to report any violations so that we can respond promptly and prevent future mistakes.

Failure to comply with our rules of conduct can have significant negative consequences for our company, our employees and our business partners. Violations will not be tolerated and, depending on their severity, may result in disciplinary action, including termination of employment, as well as civil or criminal penalties.

Contact persons for this Code of Conduct

We maintain an open culture of communication and attach great importance to direct exchange. If you have any questions or uncertainties regarding this Code of Conduct, please contact the compliance officers at Münzer Bioindustrie GmbH at **compliance@muenzer.com**.

This office provides support to ensure legally compliant and ethically correct conduct. We make sure that all employees are familiar with the Code of Conduct guidelines and comply with them.



Final provisions

Legal regulations and business conditions are subject to constant change. For this reason, this Code of Conduct is reviewed regularly and adapted to new legal requirements, internal processes or best practices as necessary. Changes or additions are initiated by the management or those responsible for compliance and communicated to all affected persons after approval.

This Code of Conduct is a voluntary commitment on the part of Münzer. However, it does not give rise to any claims on the part of third parties. It serves as a general guide and contains basic rules of conduct and legal obligations that Münzer and its employees must comply with. However, it does not claim to be exhaustive with regard to all possible legal or ethical issues that may arise in everyday business. In case of doubt, employees are advised to contact the compliance officers before taking any action.

