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Euroma Code of Conduct

3th edition – October 2024



united by taste 

Mission and values

'At Euroma, we add flavour to people's lives by creating leading natural food solutions based on knowledge and care'

Euroma is Europe's foremost partner of taste, providing food business with a total range of spice-based solutions. Our people are dedicated to develop tasty, healthy, sustainable and safe ingredients, using spices and herbs from all over the world. Doing so, we build on more than 125 years of expertise and entrepreneurship, blending tradition with cutting-edge and cost-effective processes.

Our core values:

- Take responsibility for yourself, your environment and Euroma
- Be passionate about customers
- Communicate honestly, timely, completely and based on facts
- Be ambitious to improve
- Enjoy working together and believe in the power of teamwork

Euroma Code of Conduct

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Introduction

Euroma's policy is centred on doing business according to the highest professional and ethical standards. Our business values honesty, integrity and ethics.

This Code of Conduct ('Code') affirms our long existing commitment to a high standard of ethics. The Code describes the ethical and legal responsibilities which Euroma's employees are obliged to meet. The HR manager is responsible for the Code of Conduct. Not everything can and will be described in the Code of Conduct. Where uncertainty arises about the interpretation and application of the Code of Conduct, a confidential counsellor or manager can provide a solution.

In this Code of Conduct, the terms 'the company' and 'Euroma' refer both to Euroma as a company, including its departments and operational units, and to any form of collaboration in which it holds a majority interest. The term 'employees' refers to all employees, unless stated otherwise.

Conduct the Euroma way

Conduct regarding our own employees and our colleagues

As employees of Euroma, we permanently strive to implement our company policy to the very highest standard. We achieve this by being innovative, doing business in an ethical manner and supplying excellent service. We are required to be aware at all times of how our conduct influences the company and the life of our consumers, customers and colleagues. To satisfy this we need to keep the following under review:

Observing legislation

Euroma strives to abide by all rules, conditions and legislation applicable to the jurisdiction the company operates in, both nationally and internationally. All employees are obliged to adhere strictly to all rules, conditions and legislation regarding ethical and honest entrepreneurship reflected in the company's policy.

Labor

There is no forced or involuntary labor within the company. Employees are free to terminate their employment. The wages paid meet the legal requirements and standards of the Euroma collective labor agreement. The working hours within the company comply with the rules of the law. Overtime is avoided as much as possible.

Equal employment opportunities and a ban on intimidation on sexual and other grounds

In accordance with company policy regarding equal employment opportunities, the company offers full equal employment opportunities to all suitable employees and applicants, in line with current rules and legislation. If you have any questions regarding the current regulations, please consult the HR department.

All decisions regarding employees including recruitment, engagement, training, promotion, salary, social benefits and transfers (not an exhaustive list) will be taken solely on the strength of the employee's or the applicant's certificates, expertise, performance, skills and competences, regardless of any legally applicable protective conditions.

The company strives to keep the workplace free of discrimination or harassment on sexual and/or any other grounds. No intimidation of employees will be tolerated from any source, no matter who the source is. This includes management, colleagues, company employees, employee representatives or employees of other companies, suppliers or customers.

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Intimidation refers to unwanted attention or behaviour and includes verbal and non-verbal, visual or physical intimidation, based on gender, race, age, religion, origin or any other position, characteristic or circumstance regarding people protected by current legislation.

Behaviour which negatively influences the conditions, provisions or benefits of employment, which disturbs in an unreasonable manner the work performance of a person or which creates an intimidating, hostile or aggressive work environment, will not be tolerated.

Employees health and safety

Euroma does its utmost to provide all employees with a safe, hygienic and healthy work environment. As part of this commitment, the company expects all employees to approach their work safely at all times. Employees undergo mandatory (food) safety training, which is repeated annually. Any questions regarding health and safety, please contact the HR department.

Secrecy and confidentiality

Euroma complies with all legislation protecting employees' privacy and confidentiality including personal, medical and financial documents and personal data. Such information will only be used or made known if the employee provides explicit approval to do so or when permitted or required by law.

The company reserves the right, within the legal framework, to inspect factories and property, including computers, telephone records, lockers, email, internet use, commercial documents, offices and other work spaces.

Use of company property

All employees are responsible for the appropriate use of company property. This includes information, materials, stock, working hours, intellectual property (including our brands), facilities, software, inventory, equipment or any other means belonging to or rented by the company. This includes any assets which in any other way can be described as belonging to the company. Employees are required to take all necessary steps and precautions to

protect company property against theft, destruction or other loss.

Personal use of company property without the strict approval by the company is prohibited. All employees are obliged to safeguard company property. All actions by employees involving theft, fraud, embezzlement or unlawful acquisition of company property or possessions are prohibited.

Business travel

Business travel must have a legitimate business purpose in all aspects of the trip and no or few trips will be permitted. No friends or family members travel at Euroma's expense and there must be no possible appearance of conflict with this Code of Conduct.

Political activity

Euroma respects the right of each individual employee to be politically active. However, company funds, means or working hours may not, either directly or indirectly, be used by employees in the pursuit of such political activities.

The company is open to the activities of trade unions. Every employee has the right to join a trade union of their own choice.

Euroma's key points

- **All employees must adhere to current legislation at all times.**
- **All employees will be treated fairly and with respect.**
- **Euroma strives to create a discrimination free workplace.**
- **Euroma will not tolerate intimidation of its employees; no matter who the source is.**
- **Euroma is dedicated to creating a safe and healthy workplace.**
- **Employees are responsible for the proper use and protection of company assets.**
- **Employees must report violations of this Code of Conduct.**

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Conduct regarding our business partners, customers, suppliers, competitors and society

Honest actions

All employees are expected to be straightforward, genuine and act openly and honestly with regard to customers, suppliers, competitors and colleagues.

Employees must not gain an advantage in a dishonest manner through manipulation, false pretences, threats, fraud, wilful omission of information, misuse of confidential information or by any other comparable actions. Employees are expected to put Euroma's interests always first. If in doubt, the employee can contact his or her manager.

Conflicts of interest

Any conflict of interest experienced by employees and/or their family members must immediately be made known to the line manager of the employee concerned. This will ensure that the situation can be assessed and resolved in the appropriate manner.

Examples of possible, actual or apparent conflicts include:

- Employees who benefit personally from business opportunities they have acquired by using property or information belonging to the company or due to their position within the company.
- Accepting personal advantages resulting from the employee's position in the company. Employees are barred from accepting services or gifts with a total value of more than €50.
- It is not permitted to accept excessive trips or other outings, which are not reasonably related to the interest of Euroma, from representatives of companies that do or attempt to do business with the company. Cash or equivalent payments in kind must never be accepted.
- A direct or indirect interest in an operational unit which does or attempts to do business with Euroma.
- Direct or indirect competition with the company, or having a direct or indirect interest in an operational unit which is in competition with Euroma.

- The company will endeavour to avoid certain work situations which create a direct supervision/reporting situation arising between family members.

If you have any doubts regarding a possible conflict as described above, please speak to your line manager or contact the HR Manager.

Confidentiality

Employees must safeguard the confidentiality of information entrusted to them by the company or by customers and suppliers, unless publication of such is permitted or is a legal obligation.

Customers and suppliers

Our customers and suppliers/business partners expect Euroma to perform its activities in an ethical and responsible manner. Euroma is convinced that these values are a primary condition for any business relationship and ultimately benefit both parties.

Customers and suppliers are obliged to adhere to all current regulations and legislation when delivering goods and services to Euroma. This includes:

- Not employing young people who have not reached the legal minimum working age.
- Not discriminating on conditions or characteristics which are legally protected.
- Adhering to legislation on the environment.
- Supplying safe, secure and healthy working conditions for all employees.

Competitors and fair competition

Euroma's employees must not enter into any contracts or make agreements with a competitor regarding prices. Employees must not discuss former, current or future prices or promotional activities or Euroma's purchasing conditions with competitors.

If a Euroma employee has been found to be involved in price fixing, he/she is liable to be dismissed and risks personally being fined a substantial sum. The company also risks being heavily fined and may sustain substantial financial damage.

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Environment

Euroma is concerned about the environment and is aware of the link between food processing and the environment, both on a global and on a local scale.

Locally, Euroma strives for the highest current sustainability standards in all its activities, for example through the conscious use of energy and fuels and the separation of waste. Employees are expected to work and act in an environmentally conscious manner, for example by being alert to energy consumption, limiting printing of documents as much as possible and reusing coffee cups.

Legislation regarding corruption and dealing with government officials

Euroma will not tolerate bribery or corruption in any form. Euroma will not make payments, offer favours, gifts or objects of value, directly or indirectly, to government officials with the purpose of influencing them in the performance of their duties. Nor will it lobby the same government officials to use their influence to gain a dishonest advantage with the objective of doing or securing business.

Charitable contributions, donations and sponsorship deals

These activities are required to be geared to the support of non-commercial organisations in the fields of sports, art, culture, education and science.

They will form part of Euroma's communication PR activities, as a way of reinforcing its brand. Euroma however must be careful to avoid situations where sponsorship is perceived to be a means of acquiring an unfair advantage or can in any way be linked to such a notion.

Euroma's key points

- **Treat suppliers and competitors fairly and honestly. Do not manipulate, give false information or in any other way act dishonestly in your business dealings.**
- **Work only with suppliers who adhere to the current regulations and legislation when supplying goods and services to Euroma as set out in the guidelines for suppliers.**
- **Do not talk to competitors regarding confidential information about prices, marketing, promotional programmes or purchase conditions.**
- **All employees are obliged to adhere to the guidelines regarding environmental management.**
- **Never give or offer money or anything of value to government officials to influence their decision making.**

Responsibilities as an employee

All company employees are expected to display a high standard of behaviour. All employees must understand and adhere to the company policy and standards, as well as all current regulations and legislation. It is vital that you read, understand and adhere to this policy.

Adhering to the Code of Conduct, the company policy and all current regulations and legislation is vitally important for the success and the good standing of the company. This needs to be understood and respected by all employees. Any violation will not be tolerated and may result in disciplinary measures being taken against the employee involved, up to and including dismissal. There will be prompt, consequent and effective supervision of adherence to this code.

Reporting Code of Conduct violations, production integrity and other ethical issues

At all times, we need to be vigilant to avoid circumstances resulting in actions which may be considered as a violation of current legislation or a breach of behavioural standards as set out in the Code of Conduct or company policy. A safe, healthy and ethical corporate culture is a shared responsibility of all Euroma employees.

In the event of a possible violation of the Code of Conduct or other legal rules, first discuss the matter with the employee in question. If this is not possible, discuss it with your supervisor. If you report an actual or possible violation in good faith, you will not be exposed to any disciplinary measures. If you do not report a violation known to you, or refuse to cooperate in an investigation, this can have disciplinary ramifications. Employees who

knowingly make false accusations will also face disciplinary measures.

If you prefer not to report the matter to your line manager or if you believe your line manager has not handled the matter appropriately, then please raise the matter (depending on the nature of the case) with the HR Manager or confidential counsellor (issues related to illegal behaviour, intimidation and discrimination). This is allowed and can also be done anonymously.

The details of the HR Manager and confidential counsellor can be found in the appendix that accompanies this Code of Conduct.

Appendix: Code of Conduct reporting points

HR department

hr@euroma.com

HR Manager

Johanne Ros - j.ros@euroma.com

Internal confidential counsellor regarding undesirable behavior

At every location of Koninklijke Euroma B.V. confidential counsellors are employed. For more information about who to contact, please refer to the employee handbook on Nova.

External confidential counsellor regarding undesirable behaviour

Koninklijke Euroma B.V. made agreements with Perspectief about the confidential counsellor for undesirable behaviour. You can contact Peter van den Berg for this, phone number 06-81619989 or mail petervandenberg@perspectief.eu