

# CODE OF CONDUCT

May 2023



**BISCUIT**  
INTERNATIONAL



# CEO STATEMENT

« Dear colleagues,

*In the past few years we have built Biscuit International into one of the leading businesses operating in the sweet biscuit and bread substitute sectors in Europe. We can all be proud of this achievement, and of our delicious products that millions of consumers enjoy every day. Each of us contributes to this daily, driven by our values of responsibility, excellence and team spirit.*

*It is precisely because we are a responsible company and mindful of our impact on society that we cannot compromise on our integrity as an organisation.*

*Over time we have built up a relationship of great trust with all of our business partners - customers, suppliers, consumers and colleagues. Integrity and respect are the foundations of this relationship and of our future success as an organisation. I want to ensure that we preserve and continue to build this ethos within our business and invite every employee of Biscuit International to keep these fundamental values at the centre of how we operate on a daily basis.*

*In this guide, you will find the framework and principles that are essential to continue to act ethically and responsibly, to make the right choices within the business with courage, even if they can sometimes be difficult to uphold.*

*I am counting on each of you to embody these principles with conviction and to create an environment that will allow everyone to address any malfunctions that our organisation may encounter with transparency and confidence. »*

**Leon TAVIANSKY**  
Biscuit International CEO



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# SCOPE OF THE CODE

As an international group, Biscuit International must be exemplary in its business conduct and act ethically at all times. We require all group stakeholders, from our holding companies through to all our subsidiaries, to act always in compliance with both the internal and the external rules governing our activities.

The Biscuit International Code of Conduct is a reference document for risk mitigation, drafted to provide our stakeholders with guidance on best practice. It is one element of the company's compliance and ethics system. As such, the Code of Conduct is supplemented by our operational policies and procedures.

This Code applies to all employees of Biscuit International Group, regardless of their position in the company and their contract type, including permanent, temporary, agency workers, interns, trainees, work-study students, and external and other hired staff. The persons covered by this procedure will be referred to hereafter as "Employees".



# ROLES AND DUTIES

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## All Biscuit International Group Employees' must :

- Know the Code and its rules
- Comply with the Code and its related procedures
- Contact their managers if they have any questions about the Code and its related procedures
- Report any breach of ethics or the Code of Conduct through the whistleblowing system

## All line managers and Local HR must :

- Promote the Code of Conduct to their teams
- Be exemplary in the application of the Code of Conduct and its related procedures
- Respond to Employees' questions about the application of the Code of Conduct and its related procedures
- Ensure that the Code of Conduct and its related procedures are applied by their teams
- Create a climate of trust in which each employee can discuss or report an ethical or non-compliance issue
- Protect the confidentiality of any employee who approaches them to raise an alert





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# **1. PROHIBITION OF ALL FORMS OF CORRUPTION**

# DEFINITIONS

## WHAT IS CORRUPTION ?

Corruption can be defined **as the act of soliciting, accepting or offering, directly or indirectly, an undue advantage** to a public or private person in **order to perform, delay or omit to perform an act that affects the normal exercise of a function.**

## WHAT IS INFLUENCE PEDDLING ?

Influence peddling **is the act of soliciting or agreeing** at any time, directly or indirectly, offers, promises, gifts, presents or benefits of any kind, directly or indirectly **to abuse or have abused of a real or supposed influence in order to obtain any favorable decision from a public authority or a public administration.**

## WHAT ARE FACILITATION PAYMENTS ?

Facilitation payment **means paying, directly or indirectly, undue remuneration** to a public official for the performance of administrative formalities. It is intended to induce public officials to perform their duties more efficiently and diligently. **Those payments are considered as bribery under local legislations** such as in French law.

## IT IS STRICTLY FORBIDDEN TO



**Soliciting or accepting any advantage** that could influence their judgment or behaviour



**Offer, promise or give any advantage** to anyone that could influence their behaviour

## SANCTIONS

Failure to comply with these rules may result in penalties for individuals or companies, ranging from financial penalties to imprisonment or severe restrictions on the company. Please refer to your local legislation for more details.

**BISCUIT INTERNATIONAL APPLIES A ZERO TOLERANCE POLICY TO ALL FORMS OF CORRUPTION**

# SITUATIONAL SCENARIOS

## EXAMPLE 1

A service provider wishing to do business with a group's company offers to buy you tickets for a prestigious football game in exchange of its selection as supplier.

**You cannot accept because it would be an act of passive corruption.**

## EXAMPLE 2

You respond to a call for tenders issued by a retailer. The potential client tells you that his son is a salesperson and that he is looking for a job. He also explains that hiring his son would help Biscuit International to win the tender.

**Responding favorably to the person in charge of the call for tenders would constitute a hiring of convenience and would therefore be an act of active corruption.**

## EXAMPLE 3

To export a product, you must obtain a release from customs. Due to the sanitary crisis, the time required to obtain the document is longer. The agent tells you that for a payment of a few dozen euros to him, he would take care of your file as a priority.

**You can't accept this payment because it would be a facilitation payment, which is a form of corruption.**

## WHAT YOU SHOULD DO



- Refuse the proposal
- Inform the management of your entity
- Report via the whistleblowing system





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## **2. GIFTS, INVITATIONS DONATIONS & SPONSORSHIPS**

# DEFINITIONS

## GIFTS & INVITATIONS



Gifts (such as bottles of wine or boxes of chocolates) and invitations (such as a dinner) are common practices in business life.

Nevertheless, those gifts or hospitality should not make the recipient feel beholden and affect his or her independence. If the gift or invitation influences the decision of the recipient, the act may be considered as an attempt of corruption or influence peddling.

## DONATIONS & SPONSORSHIP






Sponsorship is financial or material support given to an event or an individual by a partner in exchange for various forms of visibility of an advertising nature linked to the event or the individual.

Donation is a financial or material support given without any counterpart by a company or an individual to an action or an activity of general interest (culture, research, humanitarian...).

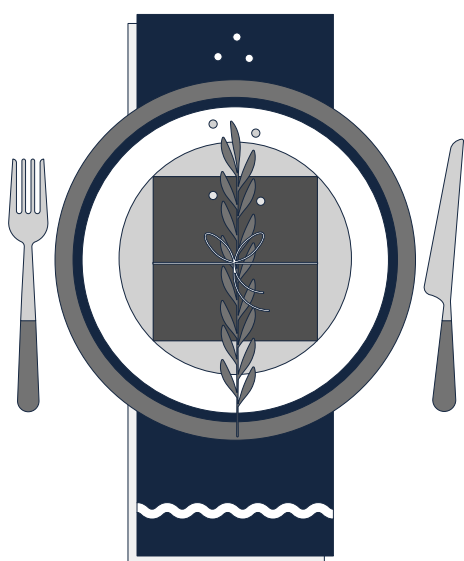
**Since gifts & invitations, such as donations and sponsorships, may be used as corruption means, those are regulated by the **Biscuit International policy for Donations, Gifts and Invitations.****

# RULES FOR GIFTS & INVITATIONS

## GIFTS

	<p>Gifts offered and received <b>below a threshold of €100 per gift and per individual</b> are authorized but <u>must be reported in writing to Finance department</u></p>
	<p>Gifts offered and received <b>over a threshold of €100</b> per gift and per individual <u>must be reported in writing and a mandatory authorization of the line manager</u> is required</p>
	<ul style="list-style-type: none"> <li>• Gifts offered and received <b>during a period of contractual negotiation</b> are forbidden.</li> <li>• Gifts offered and received <b>exceeding a threshold of €200</b> per gift and per individual are also forbidden.</li> </ul>

## INVITATIONS



Expenses for meals, entertainment, travel and lodging (including conferences and seminars) for Government Officials or private business partners are permissible only if all the following conditions are met:

- The expenses are **reasonable, proportionate**, and made in **good faith**;
- The meal, entertainment, travel or lodging **is permitted** by the **rules of the recipient's** employer (if applicable);
- The cost of the meal, entertainment and lodging is **less than €300 per person** and pre-approved in writing by your line manager.
- Invitations **below a threshold of €100** per invitation and per individual do not require pre-approval but must be reported in writing to Finance department

# RULES FOR DONATIONS & SPONSORSHIPS

## DONATIONS & SPONSORSHIP



**Political donations or sponsorships**  
are not allowed at all

**UNDER €2 000**

A mandatory authorization of the general manager of your entity is required to provide any donation or sponsorship

**ABOVE €2 000**

Every donation or sponsorship must be validated by the group's CEO or CFO

## WHAT YOU SHOULD DO



- Never offer or accept any gifts, invitations, sponsorship or donation during a tender
- Systematically declare the gifts and invitations offered or received to Finance department
- Systematically act in compliance with Biscuit International policy for Donations, Gifts and Invitations.
- Request the approval of a general manager or the group's CEO or CFO for donations and sponsorships





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## **3. PREVENTION OF CONFLICT OF INTEREST**

# WHAT IS A CONFLICT OF INTEREST ?

A conflict of interest is any situation in which there is interference between the position held in Biscuit International and a personal interest, such that the interference affects the independent impartial and objective performance of the function.

The personal interests in question may be of different kinds: financial, familial, friendlies, etc. It could be direct or indirect which means that it can concern the employee or one of its relatives.

## Every Employees and/or representatives must :

- First, avoid conflicts of interest between their private activities and their part in the conduct of Group business
- Declare their conflicts of interest or those discovered **through the Whistleblowing system.**

## HOW TO AVOID CONFLICT OF INTEREST ?



Employees must disclose any direct or indirect financial interest with a current or potential business partner of Biscuit International.



Employees must disclose any personal ties with a third-party in contact with Biscuit International, whether it is for business or employment purposes.



When an employee is involved in a selection process of any kind in which his/her direct or indirect interest interferes with that of the company, he or she must disengage from the process to prevent any conflict of interest from arising.



Employees must declare any conflict-of-interest situation through a form by following Biscuit International conflict of interest policy.

# SITUATIONAL SCENARIOS

## EXAMPLE 1

An employee involved in the **hiring process doesn't declare personal ties with a candidate.**

## EXAMPLE 2

An employee involved **in the selection process of a supplier doesn't declare personal ties with a candidate supplier.**

## EXAMPLE 3

A director/manager does not declare **his personal or friendly ties with an employee and favours him in performance evaluations** or in the allocation of salary increases/bonuses.

## WHAT YOU SHOULD DO



- Ask management if you have any doubt about a potential situation
- Declare all conflicts of interest identified through the whistleblowing system.
- Systematically act in compliance with Biscuit International "Conflict of Interest Policy"



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## **4. MERGERS AND ACQUISITIONS**



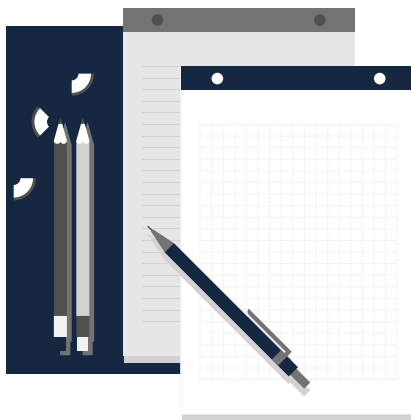
# DEFINITIONS AND GENERAL PRINCIPLES

**Mergers** are defined as operations by which a company transfers its assets and liabilities to an existing company or to a new company that they form.

**Acquisitions** are operations by which a company acquires the capital of one or more companies or a significant part of their assets, the latter remaining distinct legal entities at the end of this operation.

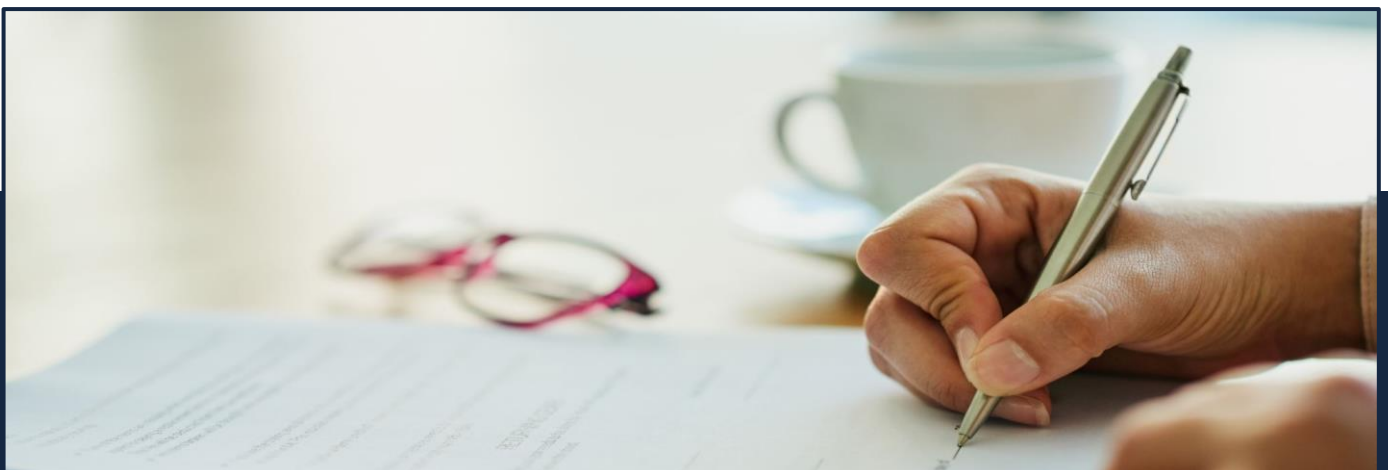
These operations may expose the group and its entities to various corruption risks that may have economic, social, reputational or legal impacts that need to be controlled.

**An anti-corruption policy for mergers and acquisitions has been drafted to prevent these risks.**



M&A transactions can only be managed at the highest level of the Group's hierarchy.

**No M&A transaction may be initiated in return for an undue advantage, in accordance with all the internal rules in force within the Biscuit International.**





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## **5. PREVENTION OF FRAUD**

# WHAT ABOUT FRAUD AND HOW TO PREVENT IT ?

Fraud is an intentional act which purpose is to obtain an improper advantage or to cause harm to the company.

- **An act of fraud can be internal.** Examples include embezzlement, theft of confidential company data, and false declarations, such as fraudulent expense reports.
- **The act of fraud can also be external,** when it comes from a third party to the company. This is the case of a fraudster who impersonates an executive or a supplier in order to obtain an undue transfer of funds in his favor.



## WHAT YOU SHOULD DO



- Be vigilant of any "urgent" or "confidential" request not respecting the standard working procedure
- Be aware of any unusual bank transfer request (high amounts to an unknown or foreign account, to a country where we have no market relations) from any GMs or the Group's CEO/CFO.
- Verify the legitimacy of the request by calling the Group's CEO/CFO directly
- If you have any doubt always double-check and request the opinion of a second person
- Second signatory holders in the organization have the responsibility to review payment information independently and not rely on the first signatory's authority.



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## **6. PEOPLE & WORKPLACE**

# HEALTH & SAFETY

Biscuit International and its CEO are committed to providing Employees with **safe and healthy working conditions**. This principle requires us:

- to create, to maintain and to improve health and safety laws and regulations
- to integrate health and safety considerations into our business planning, decision-making and daily activities
- to brief contractors fully before they start working with Biscuit International and regularly communicating with our stakeholders.

If you want to know more details about the the commitments made by Biscuit International Group and its managers, these are available in the **Health & Safety Policy**.

It is on the responsibility of each stakeholder, at all levels, to strive to create an environment that ensures a positive health and safety culture, aimed at **preventing accidents, injuries and occupational illnesses** within our operations.

## WHAT YOU SHOULD DO



- Involve yourself and behave responsibly regarding health and safety issues within your work environment.
- Comply with the Health & Safety Policy.
- Discharge your responsibility to communicate incidents and unsafe practices or conditions to your HR, line or Health & Safety manager immediately.
- If reporting to HR, line or Health & Safety manager is unsuccessful, report the incident through the whistleblowing system.



# HUMAN RIGHTS & DISCRIMINATION



**Biscuit International Group is committed to respecting human rights and all related international standards.** It includes :

- [The Universal Declaration of Human Rights of the United Nations](#)
- [The Convention on Human Rights](#) and [the Charter of Fundamental Rights of the European Union](#)
- Various conventions of the International Labor Organization, including conventions [29](#), [105](#), [138](#) and [182](#) (child labor and forced labor), [155](#) (occupational safety and health), and [111](#) (discrimination)
- [The OECD Guidelines for Multinational Enterprises](#)
- [The Convention on the Rights of the Child of the United Nations](#)

This list is not exhaustive and is likely to evolve through time.

**Biscuit International does not use of child or forced labour anywhere in its operations.**



**Biscuit International Group treats everyone fairly and equally, without discrimination** on the grounds of race, age, role, gender, gender identity, colour, religion or belief, country of origin, sexual orientation, marital status, family status, dependants, disability, social class, political views or any additional ground protected by law. Types of discrimination include:

- direct discrimination - directly treating someone less favourably
- indirect discrimination - situations when policies, practices or procedures are put in place that appear to treat everyone equally but, in practice, are less fair to those with a certain protected characteristic

This commitment applies to all interactions with individuals doing business within the organisation.

# PREVENTION OF HARRASSEMENT



## HARRASSEMENT

Biscuit International is also committed to **gender respect** and against harassment in all its forms. **Biscuit International Group believes every Employee has the right to work in an environment free from harassment**. The Company has zero tolerance for any kind of harassment, whether sexual, racial, intimidation, bullying or otherwise.

## WHAT YOU SHOULD DO



- Employees must be diligent in their activities to comply with these standards and principles.
- Discharge your responsibility to communicate incidents related to human rights breaches, discrimination or harassment through the whistleblowing system immediately.





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## **7. DATA & CONFIDENTIALITY**



# USE OF COMPANY ASSETS & DATA PRIVACY

## COMPANY ASSETS

**Company assets**, including equipment, materials, resources and proprietary information, **must be used for legitimate business purposes only**.

The company reserves the right to access, to monitor, to copy, to transcribe, to forward, to download, to capture and/or to disclose all communication sent via email, internet or voice mail at any time with or without notice, consistent with what is allowed by local law.

**Use of company systems constitutes consent to being monitored by the company.**

## DATA PRIVACY

Biscuit International Group is committed to **respect existing national laws, the GDPR** (General Data Protection Regulation) and the **French data protection authority recommendations** which limit the collection of data (in quantity and time) and protect the individuals by granting them rights (right to be forgotten, right to rectification etc.).

**Biscuit International Group respects the privacy of all individuals and the confidentiality of any personal data we might hold about them.** Therefore, the data will not be used to track the individuals and must handle all personal data responsibly and in compliance with the **Data Protection Policy** and all applicable privacy laws.

## WHAT YOU SHOULD DO



- Comply with the **Group Information Security Policy**
- Ask management in case of doubts
- Handle personal data in accordance with the **Data Protection Policy**

# CONFIDENTIAL INFORMATION

Any information which is **not publicly posted** on the Company's external-facing web sites or within the Company's promotional or marketing materials is considered non-public information and should be always kept confidential.

Non-public information may include, but is not limited to:

- **Financial records** (internal databases, statements, contracts, supplier quotes)
- **Business plans** (strategies, patent/trademark applications, results, mergers or acquisitions)
- **Sales and marketing** data (product plans, market share information, new product launches)
- **Employee records** (home addresses and phone numbers, medical records, personnel and salary data, major management changes)
- **Technical information** (recipes/specifications, designs/drawings, engineering/ manufacturing know-how, details of processes, copyrighted material, software)

## WHAT YOU SHOULD DO



- Comply with the Group Information security Policy
- Ensure that access to data is confined to those with appropriate authority
- Ensure that information is made available and delivered to the right person, at the time when it is needed
- Use the whistleblowing system if you detect any confidentiality breach



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## **8. ANTITRUST COMPLIANCE**

# HOW TO PREVENT BREACHES OF ANTITRUST LAW ?

Biscuit International Group is **committed to complying with antitrust laws** and always competes vigorously and fairly. For this purpose, the Group adopted an Antitrust Compliance Policy aiming to define guidelines to ensure compliance with applicable national and European laws and regulations.



**No Biscuit International Group's employee should agree** by written or unwritten, **with competitors to fix prices, to share markets** and/or **customers** or **to limit output**, since those are regarded as particularly serious violations of antitrust laws, and there is usually no pro-competitive rationale for these kinds of transactions



**Regarding relations with distributors**, many situations could lead to a breach of antitrust laws :

- Restricting minimum prices, customers or territories
- Discounts conditional on purchasing all or most of the distributor's requirements from the company

Any agreements containing the restrictions above should be reviewed by the CFO and the Group General Counsel.

## WHAT YOU SHOULD DO



- You are expected to be familiar with the **Biscuit International Antitrust Policy** and act in accordance with it at all times
- If you have any queries regarding this Policy or how to comply with antitrust law, please contact your supervisor or the Group CFO
- Use the whistleblowing system if you detect a breach of antitrust laws

# FOCUS ON COMPETITIVELY SENSITIVE INFORMATION

**Concerning Competitively Sensitive Information,** Exchange of certain kinds of competitively sensitive information between competitors can be treated as a cartel by antitrust agencies. Merely receiving such information – or being present when it is discussed – can be sufficient evidence that the information was considered when forming commercial strategy.

The table below provides you with information about the practice of information exchange in antitrust law :

	Usually permitted	Sometimes permitted	Usually prohibited
Substance	<ul style="list-style-type: none"> <li>• Non-strategic information</li> <li>• Industry trends</li> <li>• Industry best practice</li> <li>• Publicly available information</li> <li>• Specific industry streams</li> </ul>	<ul style="list-style-type: none"> <li>• Co-ordinating industry views</li> </ul>	<ul style="list-style-type: none"> <li>• Pricing</li> <li>• Capacity</li> <li>• Volumes</li> <li>• Customers</li> <li>• Bidding</li> </ul>
Age	<ul style="list-style-type: none"> <li>• Historic information &gt; 1 year</li> </ul>	<ul style="list-style-type: none"> <li>• Recent information</li> </ul>	<ul style="list-style-type: none"> <li>• Current / future information</li> </ul>
Aggregation	<ul style="list-style-type: none"> <li>• Information showing market trends</li> </ul>	<ul style="list-style-type: none"> <li>• Aggregated information</li> </ul>	<ul style="list-style-type: none"> <li>• Individual company information</li> </ul>

It is important to bear in mind **that trade associations can give rise to risks concerning the exchange of competitively sensitive information.** Please follow the guidelines below to avoid risks of breaches to antitrust law.

## WHAT YOU SHOULD DO



- Inform Group CEO and Cluster/Country MD of all the trade associations you attend
- Review the agenda of an industry forum or trade association prior to attending and ask your supervisor to review
- Consider attending trade association meetings with an external antitrust lawyer as needed
- If the meeting strays onto competitive sensitive areas, leave the meeting immediately and have it recorded in the meeting minutes that you have left



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## **9. INTERNATIONAL TRADE RULES**

# TRADE SANCTIONS POLICY

Biscuit International obliges Employees to conduct their activities in full compliance with all potentially applicable economic and trade sanctions laws, including local and EU sanctions regulations and the U.S. Department of Treasury Office of Foreign Assets Control ("**OFAC**") sanctions regulations (collectively, "**Trade Sanctions Laws**").



## **European Union Sanctions**

The EU imposes sanctions, either on an autonomous EU-basis, typically imposed through Council Regulations that have immediate legal effect in member states, or by implementing binding resolutions of the United Nations Security Council. Sanctions imposed by the EU may target governments of third countries or non-member state entities and individuals, such as terrorist groups and individual terrorists.

Lists of targeted countries, entities, groups and individuals, see the following European Commission website:

[http://eeas.europa.eu/cfsp/sanctions/index\\_en.htm](http://eeas.europa.eu/cfsp/sanctions/index_en.htm).

## **United States Sanctions**

OFAC is an office within the U.S. Treasury Department that has responsibility for administrating, implementing, and enforcing economic sanctions (including complying with all OFAC sanctions on embargoed countries/territories). The OFAC sanctions regulations prohibit transactions between U.S. persons and individuals and entities included on OFAC's Specially Designated Nationals and Blocked Persons List ("SDN List") and/or individuals owned or controlled by individuals or entities on the SDN List.

OFAC updates the SDN List on a regular basis here:

<https://sanctionssearch.ofac.treas.gov>



# ECONOMIC SANCTIONS POLICY

**Biscuit International must not engage in direct and indirect business and dealings with embargoed countries or blocked persons.**

As such dealings will generally violate applicable sanctions regulations, this means that the Biscuit International will not enter into any agreement with end users or other customers whereby the Biscuit International Group agrees to export products or services to or import products or services from embargoed countries, or otherwise authorize distributors, agents, or other "middlemen" to resell services to customers in embargoed countries.



## WHAT YOU SHOULD DO



- Perform a pre-screening of suppliers, distributors, resellers, customs agents, financial institutions, banks, business partners and other counterparties against the sanction's lists indicated above
- If you have any doubt always double-check and request the opinion of a second person
- If a business transaction involves an embargoed country, blocked party or may otherwise violate Trade Sanctions Laws, you must report any such attempted transaction to the Group CFO





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# 10. CORPORATE SUSTAINABILITY

# WHAT ABOUT CORPORATE SUSTAINABILITY ?

As part of living our purpose and values, Biscuit International has a clear and distinctive approach, aligned to its business strategy. The Group approach is informed by the understanding of the issues that are most material to the Group as a business and to the communities involved, and in turn by the priorities that have been set along the Group value chain - from the cocoa bean at source to the chocolate cookie baked in its factories.

Working together in collaboration with partners, external advisors, regulators and stakeholders, the Group focus on maximizing its long-term positive impact. Biscuit International has defined the strategic lines of its sustainability model **based on the United Nations' Sustainable Development Objectives (ODS), directly addressing more than the half of it.**



# OUR FIVE ESG PRIORITIES

Biscuit International key objective is to build a sustainable biscuit and bread substitutes company with strong governance. Biscuit International overall ESG strategy and related programs are led by **the Group Head of Transformation and Group ESG Manager** and work closely with the Board. An ESG committee is held twice a year in accordance with the **Biscuit International ESG Policy**.

## People and safety

We promote the safety of our people and products, providing high-quality, safe food, and fostering a culture of zero incidents and zero defects in line with our ethical values

## Sustainable Sourcing

We focus on key agricultural commodities and social challenges in the supply chain, including sustainable agriculture and human rights management, for sourcing packaging and raw materials. We commit to human rights international standards which are listed in the Human Right section of the Code of Conduct.

## Green House Gas reduction

We run the annual Corporate Carbon Footprint (CCF) inventory and will define our greenhouse gas reduction target and roadmap in line with science-based targets.

## Operational Sustainability

We commit to minimize the environmental impact of our manufacturing operations and resource input.

## Healthy Products

We promote improved health and wellbeing through product portfolio enhancements, empowering consumers with choice, mindful habits, and portion control.



# RESPECT OF ENVIRONMENTAL LAWS

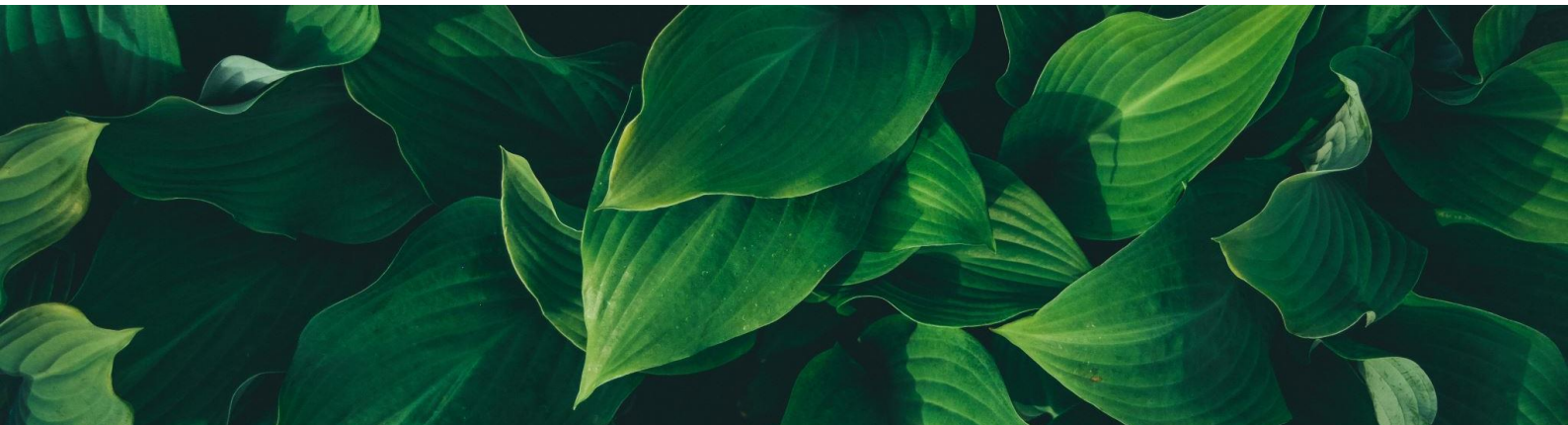
There is an increased focus on environmental issues globally, climate change above all. Industry is a key player that can help to solve these problems. Therefore, Biscuit International has high expectations with respect to the products and services it provides. The Group complies with all applicable environmental laws and regulations, minimizes energy use and waste, and handles chemicals correctly.

To foster participation and communicate our commitment to responsible environmental management, Biscuit International :

- promotes environmental responsibility among our Employees
- informs suppliers of our environmental policy and encourages them to adopt effective environmental management practices
- solicits input from Employees, suppliers, customers and board members on environmental goals.



In order to maintain a pro-environmental approach and to reinforce the fight against climate change the Group will continually seek opportunities to improve our environmental performance by establishing objectives and targets, measuring progress, and reporting our results.





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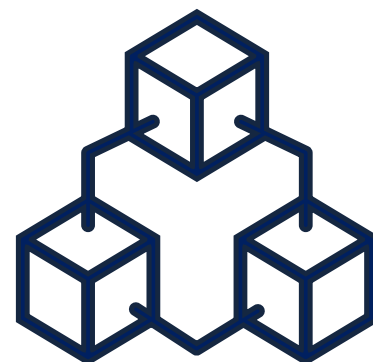
# **11. DUTY OF CARE & SUPPLY CHAIN**

# DUTY OF CARE

**Biscuit International** is committed to ensure responsible conduct of social, ethical, and environmental issues within our operation and throughout the supply chain. Our business partners, in particular our suppliers and their Employees, growers, manufactures, indirect suppliers, agents and subcontractors (collectively referred to as "**Suppliers**") are obligated to comply with the laws of their respective applicable legal systems, to promote ethical business practices, and to foster our heritage of respect for people and the environment.

Biscuit International engages in guaranteeing that our business partners meet, without limitation, the following requirements regarding [Duty of Care](#):

- respect for human rights and fair labour practices, notably by ensuring reasonable working hours, fair wages for all Employees, freedom of association, non-discrimination and non-harassment practices, safe and hygienic working environments, and the prohibition of child labour;
- compliance with environmental protection laws, regulations and international treaties, ensuring the responsible consumption of resources, avoiding environmental pollution and protecting biodiversity;
- respect for applicable national laws on animal protection and welfare, avoiding measures that cause unnecessary suffering and pain to animals.



# SUPPLY CHAIN

To eliminate the risk of human rights abuses or environmental law violation by our upstream suppliers and producers, Biscuit International avoids sourcing any raw material, processed food or packaging from the most severe risk countries. The Group also complies with local supply chain legislations such as the [German Supply Chain Act](#) for instance.

## LIST OF THE MOST SEVERE RISK COUNTRIES

Country	Overall risk	Voice and Accountability	Political Stability & Absence of Violence	Government Effectiveness	Regulatory Quality	Rule of Law	Control of Corruption
	2020	2020	2020	2020	2020	2020	2020
Eritrea	5.4	0.48	14.62	4.33	0.48	5.29	7.21
North Korea	7.7	0.00	33.49	6.73	0.00	4.81	1.44
Somalia	1.8	2.90	1.89	0.96	2.40	0.48	2.40
South Sudan	1.6	2.42	3.30	0.00	1.92	1.92	0.00
Syria	1.5	1.45	0.00	2.88	3.37	0.96	0.48
Yemen	2.5	4.35	0.94	0.48	3.85	3.37	1.92

For more details of Governance Indicators and classification procedure please check [Countries' Risk Classification 2022 report](#) from [Amfori organization](#).

Based on the recommendations of the 2022 WGI (World Governance Indicators) and BSCI (Business Social Compliance initiative), Biscuit International has identified a group of the highest risk countries. The use of goods that are produced or manufactured in banned countries is prohibited. This list will be updated when the Countries' Risk Classification is renewed.

## WHAT YOU SHOULD DO

- Perform a pre-screening of suppliers, against the list of the highest risk countries
- Inform the Group ESG Team if you obtain information that:
  - our purchased goods are produced or manufactured in banned countries
  - our suppliers do not comply with human rights, fair labour practices, anti-corruption laws, anti-money laundering regulations or environmental protection laws





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# **12. WHISTLEBLOWING SYSTEM**



# WHO CAN BE A WHISTLEBLOWER ?

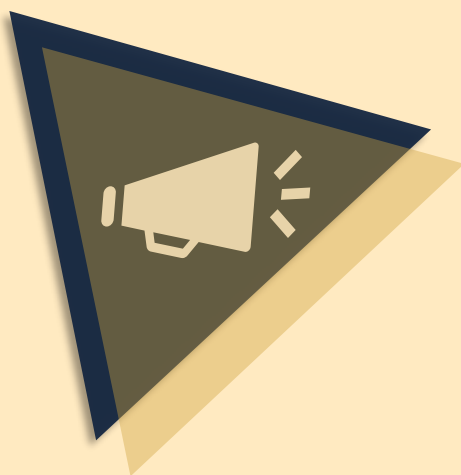
A whistleblower is an **individual** who reports or discloses, **without direct financial compensation and in good faith**, suspected wrongdoing or dangers that have occurred or are very likely to occur.



This policy applies to all Group stakeholders, including:

- Shareholders
- Members of the Board of Directors
- Employees
- Applicants in a recruitment procedure
- Contractors (e.g. suppliers and clients) and subcontractors

The information must be obtained during the **whistleblower's professional activities**, or he/she must have had **personal knowledge** of it.



## PROTECTION

- The whistleblower will be protected in his/her **professional situation**, against all form of discrimination and professional retaliation
- Anyone involved in such conduct will be subject to **disciplinary action**
- His/her **identity will be held confidential**
- The protection is extended to:
  - **Individuals and legal entities helping** the whistleblower to launch the alert
  - **Individuals linked to the whistleblower** risking retaliation measures
  - **Legal entities** controlled by the whistleblower or employing a whistleblower

# WHAT IS AN ALERT?

## SUBJECT OF THE ALERT

You are aware **directly or indirectly**, in the context of **your professional activity for Biscuit International**, of facts likely to constitute an alert:

- **Breaches of the Code of Conduct** and its related internal policies;
- **Crime or a misdemeanour** (corruption, harassment, discrimination etc.);
- **Violations of the law**, or regulatory or international standards.

## HOW TO MAKE AN ALERT

**You have the choice, at your own discretion of one of the following reporting channels:**

- The Biscuit International internal system:  
<https://biscuitinternational.integrityline.com>;
- National authorities competent to receive such reports as detailed in the appendix;
- Any European authority competent to receive such reports.

## WHAT YOU SHOULD DO



- Systematically act in compliance with **Biscuit International Whistleblowing Policy**
- Ask the Group Alert Managers (ESG Group team) if you have any doubt on what to do and/or contact your local alert manager.
- Always act in good faith (i.e. do not make a report with the sole purpose of harming an employee or a manager, knowing that the report has no basis).

# STATEMENT OF ACKNOWLEDGEMENT

**I have received and read the Biscuit International Group Code of Conduct and I understand that I have an obligation to comply with it.**

If there is any section of the Code that you do not understand, ask your supervisor or local Human Resources Representative for clarification. Ensure that you understand the Code of Conduct before you sign this Statement of Acknowledgement.

Employee Name

---

Job Title

Country

---

Date

---

Signature of Employee

# APPENDIX

## National authorities competent to receive an alert and reports of breaches within the scope of the European Whistleblower Directive

Belgium	Federal Public Service Justice (Service public fédéral Justice / Federale overheidsdienst Justitie); Federal Ombudsman (Médiateur fédéral / Federale Ombudsman).
France	The French Defensor of Rights; Authority appearing on a list fixed by a <a href="#">French decree</a> .
Germany	Federal Ministry of Justice (Bundesamt für Justiz)
The Netherlands	Ministry of Social Affairs and Employment (Ministerie van Sociale Zaken en Werkgelegenheid); Authority for Consumers and Markets (Autoriteit Consument & Markt); Authority financial markets (autoriteit financiële markten); Authority personal data (autoriteit persoonsgegevens).
Poland	Office of the Ombudsman (Rzecznik Praw Obywatelskich); President of the Office of Competition and Consumer Protection (for competition and consumer protection rules); Other bodies that accept external reports of violations in their areas of responsibility.
Portugal	Inspectorate-General of Finance (Inspeção-Geral de Finanças); Autoridade de Auditoria (IGF).
Spain	Ministry of Justice (Ministerio de Justicia); Ministry of Labor and Social Economy (Ministerio de Trabajo y Economía Social).
Sweden	Swedish Work Environment Authority (Arbetsmiljöverket)
UK	The Food Standard Agency (FSA) – any matters which may present a risk to health of any member of the public in connection with the production, supply or consumption of food; Health & Safety Executive (HSE) – any matters which present a risk to the health and safety of individuals at work; Equality & Human Rights Commission – any matters regarding the compliance with the requirement of legislation relating to Equality & Human Rights; Data Protection & Freedom of Information – any matters regarding the compliance with the requirement of legislation relating to Data Protection; ACAS – Advisory, Conciliation and Arbitration Service – will provide advice to Employees on any matters affecting them at work.



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