

Social Accountability – Rules of Conduct for Companies of the Storck Group

Preamble

Respect and a sense of responsibility for consumers, personnel and business partners characterise the corporate philosophy of Storck. For more than 100 years, entrepreneurial acting has been guided by sincerity, integrity and fairness.

Products of Storck are made by people for people – that is why people are at the centre of action. Storck respects the dignity and personality of the individual, his rights and his need to protect his own interests.

In addition, Storck is alive to being a part of society contributing to its character and aligns its entrepreneurial acting to fit in with this accountability to society as a whole.

To develop this basic ethical orientation, the company undertakes to be bound by the following Storck Code of Conduct:

Scope

The Storck Code of Conduct was established by August Storck KG as the parent company of the Storck Group. It documents binding standards for all companies of the Storck Group. The rules of conduct set forth in the Storck Code of Conduct moreover set the standard for all business relations that companies of the Storck Group enter into or maintain with suppliers, service providers and their subcontractors.

Compliance with the Laws

The laws applicable at any time, the internationally accepted conventions such as those by the International Labour Organisation (ILO) or the United Nations (UN) and all other binding provisions and industrial standards shall be complied with as a minimum standard.

Child or Young Person Labour

Storck rejects child labour and in particular any form of exploitation of children and young persons. They shall not be admitted to work before the end of their compulsory education. The minimum age must not be less than 15 years. This shall not apply to periods of practical training of students which are supported as attendant upon the development and promotion of career prospects in keeping with the requirements of school education.

Young persons may be employed, however, not more than eight hours a day and not during school hours. Young persons may not work during night hours. The daily combined strain as a result of work and transportation time to and from the workplace must not exceed ten hours.

During a permitted employment children and young persons must not be exposed to any hazardous, unsafe or unhealthy situations.

Forced Labour

Storck rejects any form of force and compulsory labour and in particular servitude and slave labour. Personnel must not be subjected to any arrangement or practice restricting their personal freedom of movement and freedom to permissibly engage in another activity or in any other way be required to perform involuntary work. It shall be inadmissible to withhold remuneration, possession, property or documents of personnel in order to force personnel to continue working for the company. Personnel do not pay for the opportunity to work. Storck does not require its personnel to pay in order to be hired or work.

Health and Safety

The company shall provide a safe and healthy workplace and workplace environment. The safety and health of personnel shall be a top priority. A general setting shall be established and measures of industrial safety taken to help avoid accidents and injuries in the course of work. In addition to arranging the workplace this shall also include regular training with regard to possible hazards to health and instruction of personnel by which measures and conduct the required safety level can be achieved and maintained. Personnel shall be urged to report accidents and safety deficiencies.

Environment and Sustainability

Every entrepreneurial acting shall take into account the protection of nature and the environment. Raw materials, energy and remnants/ residues/ waste material shall be used responsibly. By balancing economic interests and ecological requirements it is to be aimed at avoiding and constantly reducing environmental pollution and to secure a sustainable use of natural resources.

Freedom of Association and Right to Collective Bargaining

The right of personnel to form, join or leave associations or organisations of their choice and to act for them shall be respected and the exercise of such right be protected. The same shall apply to collective agreements. The admissible exercise of these rights must not have negative consequences for the employment or for personnel and their representatives. Personnel shall be granted the right to elect workers' representatives even if national laws restrict the freedom of association. Workers' representatives shall be allowed to have access to personnel at their place of work.

Discrimination

Any discrimination or unequal treatment shall be refrained from in general and in particular in recruitment, employment or termination of employment. Applicants and personnel must not be discriminated against, given preferential treatment, be excluded or otherwise put at a disadvantage based on gender, colour, race, religion, age, ethnic, national or social origin, disability, sexual orientation, political conviction or other personal circumstances which possibly provide for other aspects that might suggest discrimination.

Disciplinary Practices

Storck urges personnel and in particular superiors to apply disciplinary practices only in compliance with applicable law preserving the dignity of man and following the dictates of respect and fairness. Any form of physical, psychic, sexual or verbal harassment and any form of coercion or intimidation is to be refrained from.

Working Hours

Working hours (regular working time and extra work) shall comply with the law applicable at the workplace taking into account collective bargaining agreements and industrial standards. The normal work week must not exceed 48 hours. Extra work must be voluntary and must not result in more than 12 hours in excess of the regular weekly working hours and not in more than 60 hours a week. Extra work shall be paid for at a higher rate in line with the statutory and collective agreement provisions. Personnel shall be provided with at least one day off following every six consecutive days of working. Exceptions to this rule shall only be admissible if so provided for by national laws or freely negotiated collective agreements.

Remuneration

Personnel shall be entitled to appropriate remuneration. The remuneration paid shall match at least the binding minimum wages guaranteed by law or usually paid in the industry. Wage deductions for disciplinary purposes must not be allowed. Personnel shall be informed completely and comprehensively at regular intervals about the remuneration and its elements. The remuneration for full-time employment shall at least be such as to enable personnel to meet their basic needs of living and to provide them with some discretionary income.

Corruption

Storck rejects offering or giving third parties unlawful advantages and expects its business partners and their personnel not to promise or give such advantages to personnel of Storck, their relatives, those close to them or to Storck itself. Any form of bribery or corruption shall be prohibited.

Management System

Storck maintains an appropriate management system ensuring implementation of, compliance with and review of the standards of the Storck Code of Conduct.

Suppliers, Service Providers and Subcontractors

Storck expects suppliers, service providers and their subcontractors to comply with the principles set forth in the Storck Code of Conduct and direct and indirect partners to make their conduct to fit in with these principles. Storck invites these business partners to subject the implementation of the rules of conduct to a consistent improvement process, to provide for comprehensible documentation and to require their subcontractors or other agents to comply with the rules.

Fundamental Principle of Construction

The rules of the Storck Code of Conduct are in line with the Conventions of the International Labour Organisation (ILO), the Universal Declaration of Human Rights (UN), the UN Conventions on the Right of the Child and on the Elimination of All Forms of Discrimination against Women and the Rules of the Business Social Compliance Initiative (BSCI) Code of Conduct and the requirements of the international standard Social Accountability 8000. The understanding of the Storck Code of Conduct is therefore to be geared to the whole point and spirit of these sets of rules.

Corrective Measures

Personnel and interested third parties are entitled and expected at all times to report any non-compliance with the Storck Code of Conduct to the management. In the event of non-compliance Storck will take appropriate corrective measures. Disciplinary action or other measures to the detriment of a person providing information concerning any grievances shall be refrained from.

Information in regard to non-compliance with the Storck Code of Conduct may be reported to:

AUGUST STORCK KG Social Compliance Officer Paulinenweg 12 D-33790 Halle (Westphalia) Phone: +49 (0) 5201 / 12 – 8284

Email: social-compliance@de.storck.com