

- ORIOR GROUP

Code of Conduct

Contents

1. Principles and objectives
2. Quality standard
3. Responsibility towards people and the environment
 - 3.1 Human rights
 - 3.2 The environment
4. Safe and fair working environment
 - 4.1 Employees
 - 4.2 Equal opportunity
 - 4.3 Occupational safety and health
 - 4.4 Employee representation
5. Ethical business conduct
 - 5.1 Compliance with laws, rules and guidelines
 - 5.2 Due diligence, confidentiality and insider information
 - 5.3 Conflicts of interest
 - 5.4 Competition and corruption
 - 5.5 Donations and political contributions
6. Use of social media
 - 6.1 Our attitude
 - 6.2 What is allowed – and what is not
 - 6.3 Responsibility and dialogue
7. Dealing with artificial intelligence
8. Responsibilities, violations and sanctions, reporting and complaints

This Code of Conduct outlines the most important common values and rules of conduct that we follow and exemplify as employees of the ORIOR Group. They reflect our understanding of responsible Conduct in every relationship, and we adhere to them consistently at all times, both within the ORIOR companies and in our external interactions with business partners.

1. Principles and objectives

A holistic approach is very important to us. Economic, ecological and social components are given equal consideration and improved continuously. “We are ORIOR” is based on core corporate values, open and direct communication, ethical and respectful behaviour, and the fostering of responsibility at all levels. The primary goal of ORIOR is to continuously create added value for all stakeholders. The basis for achieving this is the conscientious management of our companies while assuming responsibility along the entire value chain, taking into account the interests of all our stakeholder groups, and aligning our activities with sustainability principles.

Our decentralised business model allows the individual ORIOR companies to live out their own culture and identity tailored to their employees and customers, as well as create original product, brand and concept worlds. The accompanying quality and safety standards that we apply to our products and services are uncompromising. ORIOR prides itself on the cultural richness in each of its competence centres, promotes diversity and commitment, supports lifelong learning and development, offers an attractive working environment, and ensures occupational safety.

All employees of the ORIOR Group act in an entrepreneurial manner, behave respectfully and ethically towards their fellow human beings, and comply with local legislation as well as internal guidelines and

the principles and rules of conduct described below. Their good example also has a positive influence on the behaviour of work colleagues and business partners. Honest, correct and respectful interactions between employees as well as with our business partners, shareholders, investors and all other stakeholders are an integral part of our corporate culture.

Our business partners, consumers and shareholders are encouraged to support us in the implementation of this Code of Conduct, to endorse the rules of conduct and values it contains and thereby further strengthen collaboration and exchange.

2. Quality standard

The ORIOR Group competence centres manufacture premium-quality products. The accompanying quality and safety standards that we apply to our products and services are uncompromising and equally fulfil the highest quality requirements of both our customers and consumers. To ensure this, we employ systematic quality management that usually exceeds the legal requirements. All of our competence centres have clearly defined quality assurance processes. Regular internal and external audits are conducted to ensure appropriate compliance. All ORIOR Group production sites have a food safety certification recognised by GFSI (“Global Food Safety Initiative”), e.g. FSSC, ISO 22000 or “International Featured Standard” (IFS), meaning that 100% of ORIOR products come from certified manufacturing.

3. Responsibility towards people and the environment

3.1 Human rights

We uphold the principles of the Universal Declaration of Human Rights and the core labour standards of the International Labour Organisation (ILO) and strive to fully embrace and act in accordance with the United Nations Guiding Principles on Business and Human Rights. Respect for the human rights of our employees, suppliers and other indirect stakeholders is an integral part of our corporate culture. We reject all forms of human rights violations, in particular child, forced and compulsory labour. We are committed to protecting and safeguarding the human rights of our employees at all times. All of our employees have a responsibility to respect the rights of their fellow human beings and to address human rights violations with their actions.

3.2 The environment

At ORIOR, sustainability is the basis and prerequisite for Excellence in Food. The respectful handling of resources and the environment is one of ORIOR's stated corporate goals. In line with our sustainability strategy, we focus on the most important fields of activity for us "Climate change and energy", "Resource use and circular economy", "Water" and "Biodiversity and ecosystems". We can, want and must make a positive contribution within these fields of activity. We set ourselves clear goals, regularly review our status in achieving them, define appropriate steps of action, and measure ourselves by our progress. Cost-effectiveness and the lowest possible environmental impact are not a contradiction, but a basic prerequisite for the future viability of the company and a decisive success factor in our business activities.

All ORIOR employees know that sustainability is a fundamental pillar of our activities. Through resource-efficient behaviour and compliance with both legal and internal environmental guidelines, all our employees assume the shared responsibility of positively influencing our environmental footprint with their actions. At the same time, we aim to increasingly make a positive contribution to the upstream and downstream value chain. Clearly defined core values and requirements – set out in our Code of Conduct for Suppliers, which is binding for all suppliers – are part of this. Another part is the regular review of environmental risks along the entire supply chain as well as addressing and demanding improvements from our business partners.

4. Safe and respectful working environment

4.1 Employees

Employees who celebrate their craft with enthusiasm and pride while embodying entrepreneurship, ethics and respect at all times and in everything they do are crucial to ORIOR's success. We are committed to providing a respectful and non-discriminatory working environment and fostering the development of our employees. To achieve this, we take into account the different employee needs by allowing flexible working hours and part-time work whenever possible without having it affect employees' existing employment conditions in any way. Our corporate values in relation to our employees and work culture are firmly embedded in the "We are ORIOR" strategic pillar. All of our employees are familiar with these core values and apply the principles they contain in terms of their own attitude, actions and dealings with others.

4.2 Equal opportunity

The diverse backgrounds, experience and skills of our employees are essential to our success. We do not tolerate any form of discrimination, bullying, harassment or disrespect in the workplace based on gender, age, nationality, race, sexual orientation, disability, political opinion or any other relevant personal characteristic. We are committed to equality and fairness and ensuring that all employees interact and work together in a respectful

manner free from prejudice. Any form of verbal, physical or visual harassment will not be tolerated and is considered a violation of this Code of Conduct. All of our business units, including recruitment and employee development, are subject to the stated principles of equal opportunity.

4.3 Occupational safety and health

We promote a safe and healthy working environment and invest in appropriate preventive measures. Occupational safety and health protection are shared responsibilities of ORIOR and its employees. We foster them by promoting conscientious behaviour and providing the best possible and effective organisational structures, regular information, and employee training and development. Our concept for "Occupational Safety and Health" (OSH) strengthens our safety and prevention culture at all corporate levels. We assume our responsibility for safety and health all along the supply chain by using our influence to communicate standards and enforce compliance wherever possible. For their part, employees do their utmost to safeguard their own health and that of their colleagues and third parties. Regulations issued by supervisors, safety officers and internal health management teams, as well as those contained in the framework of the hygiene concept, are complied with conscientiously and comprehensively.

4.4 Employee representation

Our employees are free to form and join employee representative bodies or engage in collective bargaining to protect their own interests. We actively respect and communicate the right of our employees and supply-chain business partners to freedom of association and collective bargaining in accordance with the respective regional or national laws. We are open and ready to listen and exchange ideas about the activities and concerns expressed by such associations. No employee or staff member may be discriminated against, intimidated or restricted in their working environment because of their involvement in such activities.

5. Ethical business conduct

5.1 Compliance with laws, rules and guidelines

All applicable and relevant laws and regulations, in particular regarding product quality, food safety, environmental standards, occupational safety and health, as well as antitrust and competition laws and all labour laws, must be complied with without exception. Likewise, all ORIOR employees undertake to comply with our internal policies, directives and guidelines, of which this Code of Conduct is a part. In order to ensure compliance with the laws, rules and guidelines and, in particular, the understanding of them in the best possible way, internal sensitisation measures are carried out on a regular basis.

ORIOR's reporting complies with the relevant legislation and regulatory requirements, and in particular the financial and non-financial reporting standards of accuracy, validity, reliability, timeliness, relevance and completeness.

5.2 Due diligence, confidentiality and insider information

All of our employees maintain strict confidentiality about any and all internal matters that have not been disclosed to the public. They must protect this ORIOR asset from damage and unauthorised access by third parties. This includes such things as trade and manufacturing secrets, intellectual property, know-how and business figures. As a listed company, ORIOR and all its employees with access to relevant information are subject to insider trading laws and regulations. Trading in ORIOR shares on the basis of advance knowledge or confidential information affecting ORIOR's share price is not permitted. These requirements also apply to the handling of information from other companies, such as that acquired from negotiations with them. The disclosure of such information to third parties before it has been made available to the public is also prohibited. If employees possess knowledge of facts relevant to the share price which could lead to a change in the value of ORIOR Group shares and which, to their knowledge ORIOR's management is not aware of, they are obliged to disclose this information to the management or their direct superior(s). In cases of doubt, a report must be made to the ORIOR Group CFO or the Head of Investor Relations.

Violations of these regulations may have consequences under both commercial and criminal law.

5.3 Conflicts of interest

All of our business activities must be conducted in the best interests of ORIOR. Conflicts between the personal interests of employees or involved third parties and the interests of ORIOR must be avoided. When making business decisions, all employees must behave objectively and act in such a way as to help prevent conflict situations. Should a conflict of interest nevertheless arise, we must disclose it internally and immediately initiate measures to resolve the conflict. If a conflict of interest cannot be avoided in a specific case, we have to take appropriate measures to ensure that it does not have an adverse effect on ORIOR.

5.4 Competition and corruption

We support open markets and fair competition in accordance with applicable competition and anti-trust law. Business partners are selected under fair and equal conditions using objective criteria such as experience, price, quality, services, reliability and integrity. We expressly distance ourselves from anti-competitive business activities such as participation in cartels, price fixing, or unauthorised mergers and acquisitions. Under no circumstances will we use our market position unlawfully for our own benefit.

We condemn all forms of bribery and corruption, including extortion and facilitating payments. Employees at all levels are prohibited from directly or indirectly offering, granting or accepting unauthorised and/or disproportionate financial benefits (e.g. “bribes” or “kickbacks”) to or from others (e.g. business partners, private individuals, public bodies or

institutions) in connection with business activities. This applies in particular when such actions influence the business judgement of the parties involved or if there is or could be a conflict of interests. Offering donations in any form to public bodies and employees, demanding gratuities of any kind, and accepting or distributing cash are all strictly forbidden.

Gifts, favours or gratuities may only be accepted if they do not exceed a reasonable limit or if business policy prevents the refusal thereof. The corresponding details and binding rules are outlined in our internal guidelines on company policy on donations and gifts. Supervisors must be consulted in the event of any uncertainty in this regard.

5.5 Donations and political contributions

ORIOR and its subsidiaries contribute to social and community life by making donations to charitable, social, cultural, sporting and scientific causes as is customary within a business context. Participation in political discussions on issues affecting ORIOR takes place primarily through memberships in relevant associations and groups. ORIOR does not donate funds or non-cash assets directly or indirectly to political parties, candidates, office holders or party-affiliated foundations.

6. Use of social media

This policy applies to all social media activities, in which employees of the ORIOR Group make themselves recognisable as such – whether on the official ORIOR channels or on their private profiles. It shows how we express ourselves responsibly, respectfully and in line with ORIOR’s values in the digital space – especially when we visibly represent ORIOR to the outside world.

6.1 Our attitude

As employees of the ORIOR Group, we act with integrity, transparency and respect – both online and offline. Even in the digital space, we remain committed to our responsibility and corporate values:

- We communicate clearly, appreciatively and professionally.
- We protect confidential information and pay attention to data protection.
- We respect personal rights – including images and videos.
- We avoid polarising, discriminatory or political/religious content related to ORIOR.
- We maintain our professional attitude even on personal profiles if a reference to ORIOR is recognisable.

6.2 What is allowed – and what is not

Do’s:

- Share successes, projects or positive experiences with ORIOR.
- Disseminate company posts on your own profile.
- Mark colleagues – with their consent.
- Use image or video material – after approval by the depicted persons.
- Participate in the discussion – objectively and constructively.

Don’ts:

- Publish confidential information, internal information or business figures.
- Statements that portray ORIOR, its employees or third parties negatively.
- Redistribute content without citing the source or consent.
- Have emotionalising or provocative discussions.
- Post political, religious or discriminatory content in the ORIOR context.
- Respond publicly to critical comments about ORIOR; these must be forwarded to ORIOR Corporate Communications.
- Use AI-generated images or deepfakes that show ORIOR in a distorted or misleading context.

6.3 Responsibility and dialogue

As part of the ORIOR Group, we also act as ambassadors of our corporate culture on social media. If you are unsure whether a post is suitable or if you have questions about content, the ORIOR Corporate Communications team is on hand to provide support. Even in critical or emotionally charged discussions, we avoid reacting impulsively. In cases of doubt, it is better to ask than to act publicly.

Note:

Separate fair play rules apply to content on our internal employee app, Beekeeper:
<https://orior.beekeeper.io/fairplay>

7. Dealing with artificial intelligence (AI)

AI-supported tools such as ChatGPT can support our work – for example, when formulating texts, researching or for creative impulses. Clear rules apply to ensure confidentiality, security and quality:

- **We do not use any confidential content:** no internal or sensitive information (e.g. business strategies, customer data, figures, HR information, or other sensitive content) may be entered into AI tools.
- **We do not allow the AI tools to train themselves:** in all AI tools, the option to train the models must be disabled. Settings/data controls/disable “Improve the model for everyone” (“Off”).
- **ChatGPT > centralised licensing:** the use of ChatGPT – currently the most widely used AI tool – takes place exclusively via centrally managed licenses for the paid version by ORIOR IT. With licensed versions of ChatGPT, text inputs and results can also be processed confidentially. All employees with the appropriate licenses are instructed on correct handling.
- **We maintain a responsible approach:** we always critically review AI-generated content before it is reused or published. Responsibility for content lies with the respective employee at all times.
- **We respect copyright and trademark rights:** AI-generated content must not imitate or infringe on copyrighted works or trademarks. If you are unsure about originality or rights clearance, the ORIOR Corporate Communications Team must be consulted. If AI-generated content is used for external publications, presentations or public communication, we clearly identify their origin or document it internally.

8. Responsibilities, violations and sanctions, reporting and complaints

Compliance with this Code of Conduct is part of the contractual obligations of all our employees. Any type of violation damages the integrity and credibility of the ORIOR Group. Incidents which, in the opinion of the individual employee, indicate a breach of the law, regulations, internal guidelines or this Code of Conduct must be reported. The report can be made either internally to the direct superior(s), to the HR office of the relevant unit, to the CFO of the ORIOR Group, or anonymously to an external, independent reporting line in accordance with the internal “Complaints and reporting” policy (link: <https://orior.speakup.report/en-GB/Orior/home>). All information and documents submitted are treated confidentially, and the anonymity of the person(s) making the report is assured at all times. This process must not prejudice the person(s) making the report. This does not apply to violations committed by the person(s) making the report themselves, although any violations must be assessed, taking into account the degree of severity, the employee’s proactive reporting, and within the context of legal frameworks. In addition to issuing this Code of Conduct and drafting further internal guidelines and regular awareness-raising measures, the “internal auditors” also check for evidence of misconduct as part of their periodic audits.

The Executive Committee decides on disciplinary action and/or contractual consequences, whereas the Board of Directors of the ORIOR Group intervenes in particularly serious cases or if members of management are affected.

If employees or business partners feel that their rights have been violated, they can also use the channels described in the “Complaints and reporting” policy to report incidents. ORIOR undertakes to investigate all reported cases and address violations.