

Dear Colleagues,

At the heart of our business is a simple but powerful belief: that nature offers the best answers. Our ingredients are naturally better — sourced with care, developed with purpose, and chosen by our customers because they help create products that are safer, healthier, and more sustainable.

That same belief guides how we act — not just what we make. In a business as dynamic and complex as ours, making the right decisions means more than following the rules. It requires curiosity to ask questions, courage to speak up, care in how we impact people and the planet, and collaboration to find the best path forward, together.

Our purpose — to lead the way in developing naturally better ingredients that enhance everyday life — carries a deep responsibility. What we do touches lives. That's why how we do it matters just as much as what we achieve. Every day, we must ask ourselves: "What's the right thing to do — and what's the right way to do it?"

While we trust every colleague to exercise sound judgment, there are times when the right answer may not be obvious. That's where this Code of Conduct comes in. It's here to guide you — to help you navigate situations where values and decisions intersect. And while no code can predict every scenario, your manager and colleagues are always here to support you.

When we act with integrity and stay true to our values, we continue to earn the trust of our customers, our communities, and one another. Together, we can lead — naturally, responsibly, and better.

Sincerely,

Bruno Tremblay

CEO

1. Foreword from Executive Committee

At Jungbunzlauer, we hold ourselves to the highest ethical, social, and environmental standards. These standards reflect who we are and how we work, grounded in our belief that the way we do business is just as important as what we achieve.

To support this, we've put in place a clear and practical framework of policies, guidelines and principles that help each of us act with responsibility and purpose. These are more than rules — they are everyday tools shaped by our values of care, curiosity, collaboration and courage.

Acting with care means putting people, communities and the planet at the centre of our decisions. With curiosity, we ask questions, seek out better ways of working and remain open to new ideas. Through collaboration, we build trust and alignment — within our teams and with our partners. And by showing courage, we speak up, stand by our principles and do the right thing, even when it's not the easiest path.

Compliance with all applicable laws, regulations and standards is essential — it is the foundation of every responsible decision we make. This includes adherence to human rights principles, employment and environmental law, competition and anti-corruption law, product regulations, export controls and trade restrictions, financial and accounting standards, etc.

We are committed to fostering a fair, open and transparent business environment. We do not tolerate bribery, facilitation payments, extortion or kickbacks in any form. We actively support anti-money laundering efforts and have safeguards in place to prevent any involvement in illicit activity.

We also expect the same high standards from our business partners. We value relationships with organisations that share our commitment to integrity and who take clear action when standards are not met. By staying true to our values — and to one another — we can continue to earn trust, create long-term value and lead with confidence and integrity.

2. Introduction

This Code of Conduct applies to everyone engaged or employed by any company within our Group (hereafter "Jungbunzlauer") and all activities performed for or on behalf of Jungbunzlauer. It is based on and refers to the Ten Principles of the United Nations Global Compact (UNGC).

As a framework, this Code of Conduct does not cover all details and does not provide a solution for every situation. Therefore, it is supported by our respective policies and procedures.

Jungbunzlauer requires that all employees act in accordance and compliance with this Code of Conduct as well as supporting policies and procedures, and company trainings are mandatory. In addition, all employees must also comply with all relevant laws, regulations, and industry standards wherever we operate. Otherwise, the consequences could include anything from disciplinary action, up to and including dismissal, to potential legal consequences.

It is within the responsibility of the Executive Committee of Jungbunzlauer to ensure that all employees are aware of this Code of Conduct as well as our respective supporting policies and procedures.

We expect all suppliers, contractors and other business partners to comply with the provisions of our Supplier Code of Conduct based on this Code of Conduct. We further expect our suppliers, contractors and other business partners to monitor their compliance with our Supplier Code of Conduct on a regular basis.

In case of any questions with respect to this Code of Conduct or in case of any doubts with respect to its interpretation or application, please seek advice from a supervisor or manager within our organization.

3. Purpose and Values

At Jungbunzlauer, our purpose is to lead the way in developing naturally better ingredients that enhance everyday life. This purpose guides everything we do — from how we source and produce, to how we work with one another and serve our customers.

Naturally Better is not a slogan. It's a reflection of who we are and how we choose to operate: rooted in nature, driven by science, and shaped by a long-term view. It represents our commitment to do things the right way — reliably, responsibly, and sustainably — not just for today, but for generations to come. Our reputation is built on the integrity, dedication, and professionalism of our people. These qualities are at the heart of our long-term success, and our ability to earn trust depends on every employee upholding them — every day.

We are guided by four core values:

- Care, for people, communities, and the environment
- Curiosity, to learn, ask questions, and seek better ways
- Collaboration, to work openly and effectively together
- Courage, to speak up and stand by our principles

These values shape our decisions and define how we work — with one another, with our customers and partners, and within the communities where we operate. By acting in line with them, we reinforce a culture of trust, responsibility and respect.

Our commitment to high ethical, social, and environmental standards is not optional — it's fundamental. We comply fully with all relevant laws and regulations and expect the same from our business partners. We do not tolerate unethical conduct in any form, and we have policies in place to ensure accountability and transparency at every level of the business.

At Jungbunzlauer, being 'Naturally Better' means striving not only for excellence in what we produce, but also in how we behave. Our values are more than words — they are the foundation of our shared success and the path to a more sustainable future.

4. Caring for People: our Social Responsibility

The following section is based on and refers to human rights principles, which include the United Nations (UN) Universal Declaration of Human Rights, International Labour Organization (ILO) Conventions and Recommendations, the UNICEF Children's Rights and Business Principles and the UN Guiding Principles on Business and Human Rights (UNGPs).

4.1 Human Rights

Jungbunzlauer considers human rights as a key priority. We seek to have a positive impact on humanity and are committed to the highest standards of human rights across our activities.

4.1.1. Modern Slavery and Human Trafficking

Jungbunzlauer prohibits any form of modern slavery, including forced labour and child labour, and human trafficking within its organisation and supply chains. We consider child labour as any activity not complying with ILO Minimum Age Convention, 1973, and ILO Worst Forms of Child Labour Convention, 1999, have written procedures in place to verify the age of employees and to comply with all national laws regarding the employment of young workers. We uphold international labour standards, promote decent work in global supply chains and expect all employees, suppliers, contractors and other business partners to adhere to principles that safeguard human rights and dignity.

4.1.2. Respect for Land Rights

Jungbunzlauer has a zero-tolerance for land-grabbing and is dedicated to conducting its business in a manner that respects the rights and well-being of local communities. We respect the rights and titles to property and land. This applies to individuals, indigenous people and communities across all our operations worldwide. Our commitment includes refraining from any practices that contribute to land dispossession, ensuring responsible land use and fostering a sustainable development.

4.2. Diversity, Equity, and Inclusion

Jungbunzlauer strives to foster a diverse, equitable and inclusive workplace where all individuals are treated with respect and dignity across all levels of our organisation. We are dedicated to creating an inclusive environment that values and celebrates the unique contributions of every person.

4.2.1. Harassment and Bullying

Jungbunzlauer does not tolerate harassment, bullying or intimidation in any form. We seek to create an environment where everyone's unique nature is respected free from any discrimination, intimidation and offensive behaviour. We are committed to address and rectify any instances of harassment or bullying, ensuring the well-being of our employees.

4.2.2. Equal Opportunity

Jungbunzlauer provides fair and equal opportunities across all levels of its organisation. We strive for a work environment where all employees feel safe while performing their work. We do not tolerate discrimination in any form against any employee or applicant based on their nationality, ethnicity, religion, gender, age, sexual orientation, disability, union membership, political affiliation or any similar characteristic. Our commitment to equal opportunity extends across recruitment, hiring, promotions and all aspects of employment.

4.2.3. Open Dialogue and Trust

Jungbunzlauer aims to create an open environment where all employees are closely involved in developing and achieving our business objectives. We value open dialogue and trust as fundamental principles within our organisation and encourage all employees to share their opinions on and ideas for improvement at all levels within our organisation.

4.3. Safety and Health

Jungbunzlauer is committed to provide a safe and healthy working environment for all our employees, contractors and visitors on our sites and at our offices. We prioritise the safety and well-being of individuals, emphasising the prevention of accidents and injuries and the promotion of overall health. Based on the regular and mandatory trainings on safety and health issues, our employees are expected to observe our respective policies, rules and instructions.

4.4. Fair Employment Standards

Jungbunzlauer places a great deal of importance on the working conditions of all employees and on-site contractors. Fair employment standards are integral to our commitment to ethical and equitable workplace practices. We engage with our employees and their representatives to provide fair employment standards.

4.4.1. Freedom of Association

Jungbunzlauer respects the right of employees to freedom of association and their right to form labour unions. We do not discriminate or retaliate against any colleagues based on their personal preference to either organise or refrain from organising.

4.4.2. Working Hours and Compensation

Jungbunzlauer takes care of its employees and their families through adequate working hours and by securing a decent standard of living. We are committed to comply with all applicable wage and hour laws and regulations and endeavour to pay local fair wages to all employees, allowing a decent standard of living for them and their families.

4.5. People Attraction and Development

Jungbunzlauer strives to build long-term working relationships. We value an entrepreneurial attitude, a visible and engaging leadership style, open two-way communication and collaboration across all functions and levels.

4.5.1. Responsible Recruitment and Employment

Jungbunzlauer protects the rights of candidates and employees from the attraction and recruitment stages and throughout the whole employment time. We recruit and on-board employees on the basis of their qualifications and suitability for the job.

4.5.2. People Development

Jungbunzlauer supports its employees in their growth and personal development. We train and develop the competencies of our employees at all levels within the organisation and retain and promote them whenever possible and appropriate.

5. Acting with Integrity: our Business Ethics and Corporate Governance

5.1. Personal Conduct

Jungbunzlauer is committed to succeeding in a competitive business environment honestly, transparently, fairly, and ethically. We refrain from any activity that could harm our organisation's performance and reputation.

5.1.1. Conflicts of Interest

Jungbunzlauer expects all employees to avoid situations where their personal interests conflict or might conflict with the interests of our organisation. We take business decisions that are in Jungbunzlauer's best interests.

5.1.2. Gifts and Entertainment

Jungbunzlauer requires its employees to only exchange gifts and entertainment that are appropriate to the business relationship and small in monetary value. We do not offer, give or accept, directly or indirectly, any gift or favour to improperly obtain or retain business, secure an inappropriate personal advantage, or otherwise affect the neutrality of any decisions.

5.2. Business Conduct

Jungbunzlauer is a trustworthy partner to its customers, suppliers, and other stakeholders. We do business honestly, transparently and ethically. We are committed to comply with all applicable laws, regulations and industry standards wherever we operate.

5.2.1. Fair Competition

Jungbunzlauer is pledged to fair competition. We refrain from unfair advantage over our business partners or competitors. We are committed to uphold all applicable competition and anti-trust laws of all countries where Jungbunzlauer conducts its business.

5.2.2. Preventing Bribery and Corruption

Jungbunzlauer does not tolerate bribery or any form of corruption. We operate with integrity and refrain from any direct or indirect solicitation, acceptance, or payment of bribes. We do not offer, request, accept, or make any improper payments to or from suppliers, customers, or public officials, including individuals in an important public position or people closely connected to them. We are committed to comply with all applicable anti-bribery laws.

5.2.3. Money Laundering

Jungbunzlauer does not tolerate, facilitate or support money laundering in any form. We pledge to respect all applicable anti-money laundering laws.

5.2.4. Economic Sanctions and Trade Control

Jungbunzlauer is committed to uphold all applicable economic sanctions and embargoes imposed by the UN, the USA, the EU or by law. We avoid engagement with individuals and companies listed on the designated persons lists of these jurisdictions.

5.3. Responsible Sourcing

Jungbunzlauer strives to source goods and services responsibly from parties complying with applicable laws and upholding high sustainability standards. We are committed to sourcing materials and products in a manner that emphasises ethical, social and environmental considerations. We select, approve and evaluate our suppliers and contractors based on legal compliance and in consideration of business continuity, financial, quality, reliability, ethical, social and environmental aspects. We develop fair and long-lasting relationships with our business partners.

5.4. Protection of Tangible and Intangible Assets

Jungbunzlauer owns tangible assets such as buildings, equipment, devices, etc. as well as intangible assets such as patents, trademarks, copyrighted works etc. We keep our assets safe from loss and damage and use them only for their intended purpose.

5.4.1. Property and Assets

Jungbunzlauer's property and assets are for Jungbunzlauer's intended business use. We properly maintain our assets, such as plants, offices and R&D facilities and keep such assets safe from loss and damage.

5.4.2. Intellectual Property and Confidential Information

Jungbunzlauer respects third parties' confidential information and intellectual property rights. We are committed to maintain confidentiality, integrity and proprietary nature of all confidential information as well as intellectual property rights. We safeguard our own confidential information and intellectual property at all times. Any disclosure of our proprietary or confidential information to unauthorised persons is strictly prohibited.

5.4.3. Data Protection

Jungbunzlauer is pledged to protect the personal data of its employees and third parties and treats such information with reasonable care. We are committed to uphold all applicable data protection laws and engage in proactive risk assessments and continuous efforts to enhance our data security.

5.4.4. Data Security and Cyber Risk

Jungbunzlauer strives to continuously improve the security of its processes and systems in order to mitigate the threats posed by cyber risks. Our commitment includes implementing robust cybersecurity measures and conducting regular risk assessments. We all have a critical role in helping to prevent or detect malicious cyberattacks. We strive to carefully avoid falling for any form of cybercrime (i.e. phishing scams).

5.4.5. Artificial Intelligence

Jungbunzlauer promotes the responsible and secure use of artificial intelligence. We only use approved AI systems for approved business purposes and handle all data with care and integrity. We verify AI outputs, respect legal and contractual obligations, and maintain human oversight for decisions that affect people or our operations. We are committed to ongoing training, risk monitoring and strict compliance with applicable AI regulations.

5.5. Product Responsibility

Jungbunzlauer is committed to the high quality, safety, sustainability and legal compliance of its products. We strive to adhere to stringent quality standards throughout the product life cycle. We consistently control the quality of our products. We seek to actively identify the risks associated with our products and the potential impact of our products and their packaging on people and the environment. We strive to minimise the risks and impacts in our own production processes and throughout the entire product life cycle and to lever the natural origin and biodegradability of our ingredients.

5.6. External Communication

Jungbunzlauer is aware that improper communication can affect the reputation and business interests of Jungbunzlauer. We communicate in a way that supports and protects the reputation of our organisation.

5.6.1. Transparent and Accurate Reporting

Jungbunzlauer is committed to transparency and accuracy of our external communications and to use our corporate, business or personal channels appropriately. We ensure reliable reporting in line with mandatory requirements and selected voluntary reporting standards.

5.6.2. Marketing and Advertising

Jungbunzlauer does not engage in any unfair or dishonest claims in its communications or marketing material and does not use unethical selling techniques. We strive to build enduring relationships with our customers and promote our positive image in the market. Our marketing efforts adhere to ethical standards, avoiding misinformation, deceptive tactics or any form of manipulation.

5.6.3. Social Media

Jungbunzlauer engages with experts that manage its external communications, including the official social media channels. Our interactions and content on social platforms adhere to established ethical guidelines, avoiding misinformation, discrimination or any form of harmful behaviour. Our employees understand not to discuss sensitive business topics through personal social media.

5.6.4. Government Relations and Advocacy

Jungbunzlauer seeks constructive dialogue with governmental bodies but is strictly non-political. We collaborate with governmental administrations and agencies for legal compliance. We may contribute directly or indirectly in the legislative process in case of legitimate business interests. We do not endorse or make contributions to political parties or politicians. We respect our employees' right to engage in the political process, but only in their private capacity and not as representatives of our organisation.

6. Protecting the Planet: our Environmental Responsibility

The following section is based on and refers to environmental principles, which include global treaties on environmental protection such as the Montreal Protocol, the Basel Convention, the Convention on Biological Diversity, the Kyoto Protocol, the Stockholm Convention, the Minamata Convention, the Paris Agreement and all relevant national regulations for environmental protection.

6.1. Climate Change

Jungbunzlauer is pledged to energy efficiency and long-term climate neutrality at its production sites and throughout its supply chain. Our initiatives are aligned with global efforts to mitigate climate change, and we continuously seek innovative solutions to reduce our environmental impact. We use science-based principles to minimise the carbon footprint of our production processes and supply chain and aim to deliver solutions that reduce the environmental footprint of our business.

6.2. Water

Jungbunzlauer is committed to using water sustainably at its production sites and throughout its supply chain. We continuously seek to reduce water use, increase water recycling and return properly treated water to the environment.

6.3. Biodiversity

Jungbunzlauer supports the protection of natural habitats, responsible land use and the prevention of activities that may harm biodiversity. We rely on intact ecosystems, as imbalance and destruction of ecosystems can have negative impacts on our own business. We see it as our responsibility to protect biodiversity as part of a global effort by humanity, in which corporate enterprises take on a leading role.

6.4. Circular Economy

Jungbunzlauer strives to minimise waste in its operations. We transform natural renewable raw materials into biodegradable ingredients. We develop production processes generating valuable by-products besides our intentional products. We strive to buy and deliver in bulk whenever feasible.

6.5. Air Pollution

Jungbunzlauer is committed to minimising air emissions (NO_x, SO_x, etc.) and atmospheric pollution (odour, noise, light, etc.) from its operations. We monitor emissions to air and atmospheric pollution of our production sites on a regular basis and are committed to comply with all applicable legal limits for those. Furthermore, we implement impact-reducing technologies where applicable.

7. Business Partnerships

Jungbunzlauer's commitment to ethical business practices extends to suppliers, contractors and other business partners and we hold all such parties to the same high standards. We expect adherence by all our suppliers, contractors and other business partners to our Supplier Code of Conduct based on this Code of Conduct. All our suppliers, contractors and other business partners are further expected to fully comply with all applicable local, national and international laws relevant for their business. We further expect that the employees of our suppliers, contractors and other business partners are aware of their respective obligations. All our suppliers, contractors and other business partners are expected to ensure that their business partners (i.e. suppliers, contractors or subcontractors) adhere to codes of conduct which are in all material respects equivalent to our Supplier Code of Conduct and that their business partners comply with all applicable local, national and international laws relevant for their respective business.

8. Living the Code of Conduct

8.1. Be Questioning and Ask for Advice

This Code of Conduct shall serve as important resource for making informed decisions. However, there may be instances where the appropriate conduct is not clear or not evident. When faced with uncertainty about how to proceed in a particular situation, please always ask yourself the following questions:

- Is it legal?
- Is it consistent with this Code of Conduct?
- Does it feel right?
- Have I obtained other opinions or required permissions?
- Would my colleagues think positively of my decision?
- Does my behaviour benefit Jungbunzlauer's reputation?

If NO is or might be the answer to one or more of these questions, and/or you remain uncertain or uncomfortable in a given situation, please reconsider your decision and seek advice by a supervisor or manager within our organisation.

8.2. Speak Up

We all have a responsibility to speak up if we have a concern that may be related to the provisions of this Code of Conduct. Whenever you are unsure about a particular situation or have witnessed behaviour that contradicts or may contradict with our values, it is vital that you raise your concern!

You are encouraged to report any identified or suspected misconduct immediately to your supervisor, your manager or another manager within our organisation. If you feel uncomfortable or wish to report anonymously, you can refer to our third-party whistleblowing system assuring confidentiality of the report and protection of the whistleblower having spoken up in good faith.

9. Responsibilities & Review

This Code of Conduct has been approved by the Executive Committee of the Jungbunzlauer Group and is subject to a regular review at least every two years or whenever significant changes occur in operations, regulations, or other standards.