



Supplementary agreement to the supply framework agreement Code of Conduct for Business Partners - Corporate due diligence in the supply chain -

Preamble

We, Windel GmbH & Co. KG, are aware of our special social responsibility. Windel GmbH & Co. KG attaches great importance to responsible long-term value creation and compliance with all national and international legal regulations. When purchasing raw materials, goods and services, Windel GmbH & Co. KG expects its business partners to adopt a sustainable approach that ensures environmental protection, fair treatment of employees, and compliance with health and safety regulations. The basic requirements of Windel GmbH & Co. KG for all (contractual) partners are regulated in this **Code of Conduct for Business Partners**. The principles are in line with the Business Social Compliance Initiative (BSCI), the fundamental principles and rights of the International Labor Organization (ILO) and the ten principles of the United Nations Global Compact (Davos, 1999). Windel GmbH & Co. KG also strives to exceed these minimum standards whenever possible.

A) What laws must be complied with?

1. Compliance with laws

All business partners:inside Windel GmbH & Co. KG must comply with national and international regulations, in particular labor and social laws, regulations and laws on product safety and environmental protection regulations. Employment agreements or comparable measures may not circumvent this Code of Conduct.

B) Which social standards must be complied with?

2. No child labor

Child labor and any exploitation of children and young people are not tolerated in accordance with ILO Convention No. 138. The minimum age of employment may not be lower than the age at which compulsory schooling ends. In no case may employees be younger than 15 years of age, unless exceptions recognized by the ILO apply.

If business partners employ young workers, they shall ensure that (a) the nature of the activity does not adversely affect their safety, health, development or morale; (b) their working hours do not interfere with participation in vocational training programs recognized by competent bodies. If different regulations apply side by side, the one that provides the highest level of protection and safety to employees shall be applied in each case.

3. No forced labor

All forms of forced and compulsory labor according to ILO Convention 29, debt bondage, serfdom or work by enslaved persons are not tolerated. No employee may be forced to work, directly or indirectly, by force or intimidation. Employees have the right to terminate their employment.

4. No discrimination

According to ILO Convention 111, no discrimination of any kind will be tolerated in employment and/or occupation. In particular, any distinction, exclusion or preference based on race, color, sex, age, creed, political opinion, membership in a workers' organization, physical or mental disability, marital status, ethnic or social origin, nationality, sexual orientation or other personal characteristics is prohibited.

5. Wages and benefits

Business partners are obliged to compensate their employees at least in accordance with the statutory minimum wages or, if higher, on the basis of industry standards approved in collective bargaining. Business partners shall respect the right of their employees to adequate remuneration that is sufficient to enable them and their families to live in dignity in accordance with ILO Convention 131 and shall

provide the statutory social benefits. Compensation shall be paid on time, regularly and in full in a legal tender. Overtime pay shall be paid in addition to regular wages as required by law.

Where accommodations are provided, they must be clean, safe and meet the basic needs of employees.

6. Regulated working hours and written employment contracts

Employees shall not work longer than the legally permissible working hours and legally regulated rest days shall be observed. Within a period of 7 days, employees must be granted a rest period of 24 hours. As a rule, the average daily working time of 8 hours and the average weekly working time of 48 hours may not be exceeded.

The business partners guarantee written documentation of the employment conditions (e.g. start and duration of the employment relationship, working hours, wages and bonuses) of their employees and the employees of their contractual partners.

7. Freedom of association and right to collective bargaining

All employees have the right to join and form associations of their choice and to bargain collectively at any time within the framework of applicable state laws and in accordance with ILO Conventions 87 and 98.

8. Prohibited disciplinary actions

Disciplinary measures against employees may only be taken in accordance with applicable national and international regulations. Inappropriate disciplinary measures must be refrained from, such as the unlawful withholding of salary, social benefits or documents (e.g. ID cards) and the prohibition to leave the workplace.

No employee shall be subjected to verbal, psychological, physical, sexual or physical violence, coercion, harassment or other abuse.

9. Occupational safety and health

All employees must be provided with a safe and healthy working environment at all times. Appropriate precautionary measures must be taken against accidents at work and occupational diseases, and adequate personal protective equipment must be provided. Employees shall be protected from fire and toxic substances. Lighting, ventilation and heating systems as well as adequate sanitary facilities must be available in sufficient quantities.

All employees are to receive regular training in the areas of health, safety and emergencies in the workplace. The training courses shall be documented.

Windel GmbH & Co. KG requires its business partners to comply with the basic employee rights of the applicable national legislation. The Base Code of the Ethical Trading Initiative specifies the minimum requirements of the ILO for decent workplaces. Windel GmbH & Co. KG requires its business partners to comply with the ETI Base Code. In this respect, Windel GmbH & Co. KG requires that obligations of business partners towards employees are not circumvented by the use of subcontracting or other non-regular employment relationships.

C) What environmental standards must be met?

10. Environmental permits

Business Partners shall ensure that all required environmental permits and approvals are obtained, kept current and followed.

11. Climate & resource protection

Environmental pollution is to be avoided and reduced. The aim is to avoid or continuously reduce the environmental impact of resource and energy consumption, air pollutants, water consumption, spreading in soil and water, and the resulting waste, to preserve biodiversity, and to promote recycling management.

Business partners are encouraged to reduce their carbon footprint. Business partners are required to ensure that no clearing of primary forests and other high conservation value (HCV) areas takes place within the supply chain and that cultivation on land cleared after July 2008 is prohibited.

12. Hazardous substances

Business partners:inside shall ensure clear labeling of hazardous materials, chemicals and substances and their safe handling, movement, storage, reuse and disposal.

13. Packages

Business partners are required to use more environmentally friendly packaging. To this end, packaging must be avoided wherever possible, reduced or improved in terms of its environmental effects. These principles are to be applied in the order of priority given here - for example, the ecologically best packaging is that which can be avoided completely. Packaging is considered to be more environmentally friendly if it is reusable, uses as little material as possible, is recyclable and is made of secondary raw materials or alternative materials or certified paper.

14. Animal Welfare

Business partners undertake to comply at all times with the animal welfare regulations relating to the production of eggs, milk production and beekeeping in order to protect and promote the welfare and health of the animals. Eggs as raw material or basis for semi-finished products must at least originate from free-range husbandry. In the case of milk as a raw material or basis for semi-finished products, tethering should be avoided as far as possible for dairy cows. During honey production, all hygiene guidelines must be observed, which include disinfection and care of the apiaries.

D) What economic standards must be met?

15. Bribery and corruption

Any form of bribery or corruption will not be tolerated. All business partners and their employees must behave in such a way that no personal dependence, obligation or influence arises. Business conduct based on fairness and compliance with the applicable national and international standards is expected from all. In addition to compliance with the provisions of antitrust and competition law, this includes in particular observance of the regulations on responsible corporate management ("corporate governance") and the regulations on the prevention of corruption and illegal money transfers ("money laundering"). Insofar as gifts are customary and courteous in nations, it must be ensured that no obligatory dependencies arise as a result and that the applicable national legal standards are observed. Any indications of corrupt behavior should be reported to Windel GmbH & Co.

16. Avoidance of conflicts of interest

Windel GmbH & Co. KG requires the avoidance of conflicts of interest. Business partners may make decisions - related to their business activities with Windel GmbH & Co. KG - exclusively on the basis of objective criteria. Conflicts of interest with private interests or other economic or other activities, including those of relatives or otherwise related persons or organizations, must be avoided from the outset.

17. Data protection and intellectual property

The business partners shall comply with all applicable data protection laws. They are responsible for ensuring that confidential business information or trade secrets that come to their knowledge in connection with business activities with Windel GmbH & Co. KG are kept confidential and that they are not used in an unauthorized manner or disclosed to third parties.

18. Rights of local communities

Business partners respect applicable local, national, international and traditional land, water and resource rights, especially those of indigenous communities. Legally permitted land use changes require the documented consent of the affected communities.

Validity range

This Code of Conduct forms the basis of all business relationships. In particular, it also applies to all suppliers and their agents and subcontractors, collectively referred to as "business partners". The contractual partners shall pass on the contents of this Code of Conduct to their business partners in a comparable manner by means of suitable contractual provisions and shall make every effort to regularly check compliance with the obligations.

Windel GmbH & Co. KG requires that its business partners act in accordance with the German Supply Chain Sourcing Obligations Act (LkSG). Business partners of Windel GmbH & Co. KG support any measures taken by Windel GmbH & Co. KG, which according to § 3 LkSG include, among others, the establishment of a risk management system (§ 4 para. 1 LkSG), the definition of an internal responsibility (§ 4 para. 3 LkSG), the performance of regular risk analyses (§ 5 LkSG), the establishment of preventive measures in the company's own business (§ 6 paras. 1 and 3 LkSG) and vis-à-vis direct suppliers (§ 6 para. 4 LkSG).



Notification of violations - Complaint procedure

Should contractual partners become aware of serious human rights or environmental risks in the supply chain that are highly likely to materialize or have already materialized, they will inform Windel GmbH & Co KG immediately.

Complaints or indications of violations of this Code of Conduct can be reported to Windel GmbH & Co. KG at any time by all employees - also in anonymous form. The complaint mechanism must be easily accessible and trustworthy. All business partners guarantee to inform all employees about the complaint mechanism and to refrain from disciplinary measures against the reporting person.

Sanctions and remedies for non-compliance

Windel GmbH & Co. KG is entitled to verify the principles established in this Code of Conduct. Business partners make this possible by providing written information for the purpose of the audit and by allowing announced on-site inspections of the company. Third parties commissioned by Windel GmbH & Co. KG (e.g. auditors) may be entrusted with the inspection. Company and business secrets of business partners or third parties are excluded from the obligation to provide information and the possibility of inspection. On-site inspections shall be announced by Windel GmbH & Co. KG at least two weeks in advance and shall be carried out during normal business hours. In the event of violations, warnings may be issued to the contracting parties. If appropriate remedial action is not taken immediately and/or the provisions of this Code of Conduct continue to be violated, Windel GmbH & Co KG shall be entitled to terminate the contract with the contractual partner without notice.

Place, date	
_____	_____
Stamp business partner/Signature	Signature in block letters