



**ECKES** granini

the best of fruit

CODE OF CONDUCT

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| CREATE VALUES,  
MAINTAIN VALUES  
AND SHAPE THE FUTURE |



| STATEMENT BY THE CHIEF EXECUTIVE  
OFFICER OF THE ECKES-GRANINI GROUP |

Dear Eckes-Granini colleagues,



Eckes-Granini is the leading European fruit juice and fruit beverage company, whose business model is based on strong brands that are listed in the top positions in all countries in the brand awareness rankings. Our group of companies offers a variety of healthy and natural fruit drinks of the highest quality. In our daily activities we focus on our consumers, our brands and our employees.

To maintain our business success, Eckes-Granini developed and adopted a comprehensive compliance program back in 2011 that applies to all areas of the company and is based on three pillars: prevention, awareness and response. The fundamental element of the Compliance Program is this Code of Conduct. We also refer to this Code as the Corporate Governance, as it summarizes all the key principles of the Compliance Program and serves as a code of conduct in day-to-day business. The Code of Conduct addresses all employees of the Eckes-Granini Group, and the standards of conduct set forth therein are binding on all.

I, Tim Berger, stand behind our Code of Conduct with full conviction and base all my actions as CEO of the Eckes-Granini Group on it. In the same manner as you as an employee of the Eckes-Granini Group, I am responsible for compliance with our Code of Conduct in all areas of our business activities. By observing and implementing the principles of the Code of Conduct as the Corporate Governance on a daily basis, we can continue to build Eckes-Granini's success together.

Tim Berger

*Chairman of the Executive Board Eckes AG*

- I. | Our actions are based on fundamental ethical values and valid legal systems.



II.

Our employees make the difference and are a decisive factor in our company's success. We treat each other with respect.





III.

Integrity and transparency are the standards by which we judge our actions.

100%  
Fruit



IV.

We advocate free and fair competition, and refuse to take part in bribery or corruption.

$$\pm \sqrt{4ac}$$

$\pi$

eter

$$P = 2l + 2w$$



V.

We handle physical and intellectual property in a sound and responsible manner.



VI.

Our predefined standards for the quality and safety of our products are the basis for the maintenance and preservation of our brands.





VII. | We always act in a sustainable  
and socially responsible manner.



VIII.

Any violations of the Code of Conduct, guidelines and laws will not be tolerated.



IX.

Every individual employee is responsible for his/her own actions. Management is obliged to create the conditions necessary for compliance with this Code of Conduct and to establish compliance controls.



# | *Eckes-Granini Code of Conduct* |



## I. Core values and corporate culture

Description of essential values which guide the internal and external actions of Eckes-Granini.

Eckes-Granini (consisting of Eckes AG, the holding company, and all direct and indirect subsidiaries and affiliates) is a family-owned enterprise that has lived with success for and from its brands since 1857. We wish to maintain our independence in future as well. Therefore, we rely on longevity and sustainable action in support of the development of the Eckes-Granini Group.

The diversity of cultures and people in our group offers us significant innovative potential and promotes the progressive development of our business. Our diversity is integrated on the basis of mutual respect, trust and fairness.

Our actions are based on fundamental ethical values and valid legal systems.





## II. Employees

### **Description of Eckes-Granini's conduct towards its employees and the conduct of individual employees towards the organization.**

At Eckes-Granini, people make the difference, and people play a crucial role in our company's success. Thus continuous personnel development and employee qualification programmes are just as important as the active participation of our employees in such programmes. We offer our employees a workplace that meets all relevant legal requirements with respect to safety, ergonomics and environmental factors. We also strive to contribute to preserve the health and quality of life of our employees by creating an appropriate working environment.

We comply consistently with all labour laws and other relevant statutory regulations. Discrimination, harassment and other forms of abuse at the workplace are not tolerated.

We respect our employees' privacy. Personal employee data are used solely for the purposes permitted by law. Every employee has the right to demand disclosure of all information relating to his/her person maintained in company records as well as the manner in which such information is used.

Eckes-Granini is a politically neutral company. Employees may engage in political activity outside of working hours only and are prohibited from using corporate resources in support of or citing Eckes-Granini in reference to such activity.



## III. Integrity and transparency

**Integrity: Our actions are guided by the rules of ethical business conduct and are in full compliance with applicable laws as well as internal regulations and guidelines.**

**Transparency: All business transactions are documented and verifiable, and all required information is available.**

It's a matter of principle for us to consistently comply with all statutory rules and regulations and act in accordance with the principles of integrity and transparency. We ask all employees to support their colleagues in their efforts to comply with laws, external and internal guidelines and this Code of Conduct.

In order to ensure the transparency of our business processes, we adhere to all laws and guidelines applicable to the documentation of these processes. We prepare all business-related documents truthfully, properly, completely and on a timely basis.



## IV. Relations with market participants

### Description of conduct towards suppliers, customers and competitors.

In all of our business activities, we consistently adhere to the following rules in our relations with customers, suppliers and competitors:

- We observe the rules of fair competition.
- Anti-competitive agreements between competitors and in relations with suppliers and customers are strictly prohibited. We are prohibited in particular from entering into price-fixing agreements. Also prohibited are agreements which restrict the freedom of our customers to determine their own prices. Compliance is also required with all other applicable fair competition laws and guidelines. Personal liability for violations of fair competition law applies not only to corporate management but also to each individual employee.
- Information from or about our competitors may be obtained, distributed or utilized, provided said information is obtained from, distributed to or utilized – either free of charge or on a fee basis – through publicly accessible sources or third parties. In every case, the sources in question must not be prohibited by law or contractual agreement (i.e. a non-disclosure or confidentiality agreement) from releasing or disclosing the information in question.
- No one in the employ of Eckes-Granini is permitted to offer money, advantages, special services, gifts or other objects of value to another individual or to request or accept any of the above forms of gratification from another individual for the purpose of obtaining or securing a contract/order for Eckes Granini or the business partner in question, or in order to exert influence on the award of a contract order for the purpose of achieving or obtaining special or preferential treatment or other advantages of any kind. In order to ensure that business decisions are not and cannot be influenced in this way, management and staff have to consider the following four criteria:
  1. The possible existence of a critical temporal link between the gratification (e.g. invitation) and the conclusion of a business transaction with an existing supplier/customer (e.g. supplier contract/annual planning discussion with a trade partner)
    - A minimum time difference of six weeks between the invitation and the transaction date is required

2. The relationship between the value of the gratification and the past volume of business with existing suppliers/customers
  - Annual turnover disproportionately low in relation to the gratification/invitation
3. No imminent decision regarding the conclusion of a business transaction with a new supplier/customer
  - A minimum time difference of six weeks between the invitation and the transaction date is required
4. The possibility that the company's image could be damaged if the public learns about the gratifications in question

If reservations are encountered with respect to any of the criteria mentioned above, the gratification invitation in question must be disapproved.

The aforementioned criteria must also be taken into account with respect to invitations to such events as golf tournaments, ice-hockey matches, football matches, etc. – even if such invitations have been extended within the context of a business relationship from time to time in the past and were not in conflict with the law. Invitations of this kind must be completely and appropriately documented, for example, in a standard form in which the decision and the supporting arguments are clearly described. Furthermore, such invitations and other similar gratifications received by Eckes-Granini employees must not only be documented but also described in clearly understandable terms and approved by the appropriate superior.

- No gratifications may be promised or granted to office holders or government officials.



## V. Protection of physical and intellectual property

**Assets held by Eckes-Granini or its business partners may not be used for personal advantage or advantage of third parties. Furthermore, to avoid jeopardizing the status of the company, neither know-how nor confidential information may be released to unauthorized third parties.**

Every employee is responsible and accountable for the proper use and disposition of assets held by Eckes-Granini or its business partners and entrusted to him/her. Such assets include real property, buildings and technical facilities, products, computers, telephones, vehicles, etc., as well as intellectual property, such as brands/trademarks, production methods, inventions, formulas and other proprietary know-how.

All employees of Eckes-Granini are obliged to treat any and all internal business matters which have not been disclosed to the public as confidential. Such matters include, for example, details relating to our organization and our company locations, our business strategy, customers, sales activities, production, research and development processes and activities as well as figures relating to internal reporting. This confidential information may not be released to third parties (including relatives, friends and acquaintances) outside the company unless the release of such data is justified for business reasons. In the latter case, confidentiality may be ensured on the basis of a corresponding signed non-disclosure or confidentiality agreement. The obligation to maintain confidentiality is not limited to working hours and remains in force even after termination of the employment relationship. The aforementioned requirements also apply to the use of social networks (Facebook, Twitter, etc.) and personal e-mail addresses. Participation in such communication media under the corporate ID "eckes-granini.com" is prohibited.



## VI. Quality standards and product safety

**Our actions are devoted above all to the preservation and maintenance of our brands. Therefore, we have established clearly defined standards of quality and safety for our products.**

Our brands are known to embody the best of fruit and thus to foster a healthy and enjoyable lifestyle. Our defined quality standards reflect the fundamental needs and requirements of our customers and consumers, which we aim to fulfil at all times. Quality in accordance with these standards has the highest priority at Eckes-Granini – from the selection of fruit and other raw materials to the production process and the finished product. Our commitment to quality is also emphasized by consistent compliance with associated internal guidelines as well as laws and other regulations which ensure the safety of our products as well as related production and sales processes.



## VII. Our social responsibility

**It is our policy to act in a sustainable and socially responsible manner at all times.**

People are the focus of our concern at Eckes-Granini. That's why, as a family-owned enterprise, acting in a responsible manner is an integral component of our corporate culture. This includes recognising of our social responsibility for our employees and fellow human beings as well as the sustainable resource and environmental management policy.

We respect fundamental human rights and reject, in particular, all forms of forced and/or child labour.

Within the framework of our sustainable environmental management policy, we not only comply with all environmental laws and regulations but also we strive consistently to surpass the corresponding standards through continuous improvement measures applied to our production processes along the entire value chain (e.g. eco-audits and certifications, water and energy conservation measures, packaging material reduction).

We expect our customers and suppliers to adhere to the same principles of social and environmental responsibility and thus to refrain from violating the principles of this Code of Conduct.



## VIII. Violations and consequences

**Any violations of the Code of Conduct, guidelines and laws will not be tolerated.**

Every employee must be aware of the statutory provisions which apply to his/her work, and must take care to comply with these provisions in all matters relating to the organization. They must also help ensure that fellow employees and/or colleagues are informed of these provisions. Every management executive provides support in this context. Employees can be assured that Eckes-Granini will respond appropriately to any violations of this Code of Conduct, internal or external guidelines or laws.



## IX. Responsibility

**Every individual employee is responsible for his/her own actions. Management is obliged to establish the necessary prerequisites for compliance with applicable rules and regulations and to provide for appropriate controls.**

It is the responsibility of every employee to perform his/her duties in compliance with the Code of Conduct, guidelines and applicable laws. Superiors are to support their fellow employees in their efforts to comply. Eckes-Granini will provide appropriate training programmes in this context. Employees who fail to read this Code of Conduct are not exempt from compliance with the provisions contained therein.

The Code of Conduct cannot serve as an exhaustive set of rules for the behaviour of all employees in their respective business environments. Eckes-Granini has also issued other internal rules and guidelines which apply to employee conduct. These rules and guidelines are available in the respective departments and can be obtained on request from the responsible superior.

Employees are also reminded that if the Code of Conduct conflicts with any other laws or guidelines, the laws or guidelines in question will take precedence over the Code of Conduct.

## Contact

Points of contact designated by the boards of the national organizations are available to answer questions regarding uncertainties in the interpretation and application of this Code of Conduct.

## Entry into force

This Code of Conduct was signed as of January 26th, 2012 and shall apply henceforth to all employees of Eckes-Granini. It may be modified, amended or revoked at any time and for any reason.





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