

# CODE OF CONDUCT

for Business Partners

# Introduction

**Feeding the world's growing population in a responsible and sustainable way is at the core of Nutreco's mission.** Our own people and operations are governed by our Code of Conduct for Employees and supporting policies and processes. Our Code of Conduct for Employees can be found [here](#).

We recognise that our mission can only be achieved with the cooperation of our business partners. Therefore, we have developed this **Code of Conduct for Business Partners**. It enables us to engage with our Business Partners on sustainability, compliance and integrity issues, and we will only conduct business with companies or individuals that comply with the standards set out in this Code of Conduct.

If a Business Partner fails to comply with this Code of Conduct, Nutreco may take corrective measures, including termination of the business relationship.

Our mission can only be achieved with the cooperation of **our business partners.**



# The Code of Conduct

**The term “Business Partner” in this document refers to any company, organisation or, individual engaging in business with Nutreco.**

## **Legal compliance:**

- Business Partners shall abide by all applicable laws and regulations that govern their business activities.
- Business Partners shall comply with applicable trade sanctions and regulations. Nutreco does not accept any materials or services from persons, entities, governments or countries if doing so violates applicable sanctions.
- Nutreco has a zero-tolerance approach to corruption. Business Partners shall not be involved in any form of bribery, kickbacks or facilitation payments. Business Partners are expected to observe Nutreco’s standards concerning gifts and hospitality involving employees and representatives as included in our Code of Conduct for Employees (see link above).
- Nutreco promotes and supports fair competition. Our Business Partners shall compete fairly and comply with antitrust and competition laws in the countries in which they operate. Business Partners shall not make agreements or engage in practices that are illegal, such as price-fixing, market allocation or abuse of a dominant position.

- We expect our Business Partners to immediately declare any potential conflict of interest before starting a business relationship with Nutreco and/or during the business relationship. In addition, our Business Partners shall not provide financial or other support to political parties or candidates to influence transactions with or for Nutreco.
- Business partners shall comply with relevant privacy and information security laws and regulations for the collection, processing, storage, transmission and deletion of personal data. Business partners shall protect the reasonable privacy expectations of all stakeholders and ensure appropriate levels of data security.

## **Human rights:**

### **Business Partners shall:**

- Respect laws and regulations regarding wages and working time in the country concerned.
- Not engage in child labour<sup>1</sup>.
- Support equal opportunities and fight discrimination at the workplace.
- Not use prison, indentured, or bonded labour<sup>2</sup>, or use corporal punishment or other forms of mental and physical coercion as a form of discipline.
- Respect and support the free association of labour and employee rights to join a trade union where allowable by law.

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## Labour practices:

### Business Partners shall:

- Provide safe and healthy working conditions for its employees.
  - Have a Health & Safety Policy that is freely available for all employees to access at any time, if and to the extent required under local laws.
  - Continuously strive to minimise accidents and risks.
- Provide a working environment that is free from harassment and disrespectful conduct.

## Environment:

### Business Partners shall:

- Respect all relevant environmental laws and regulations.
- Ensure the efficient and sustainable use of resources and strive to minimise their negative impact on biodiversity, climate change and water scarcity.
- Manage waste responsibly and implement steps to reduce, reuse or recycle waste as much as possible.
- Engage responsibly with the communities in which they operate, manage community impact resulting from company operations and implement procedures for impact control.

Nutreco welcomes dialogue about this **Code of Conduct** and expects all Business Partners to actively address and mitigate non-conformities. Business Partner gives Nutreco the right to audit, at reasonable notice and during office hours, Business Partner's compliance with the requirements set forth in this Code and agrees to provide all reasonable assistance to Nutreco (and our advisors) for obtaining the required information during such audit.

## Product safety:

- All products and services delivered to Nutreco shall be safe for their intended use.

## Records:

- Business Partners shall keep accurate, complete and up-to-date records of their business activities with Nutreco. These records shall be retained in accordance with applicable laws.

## Supply chain responsibility:

- Business Partners shall endeavour to ensure that the principles of this Code of Conduct including applicable supplements is communicated and fulfilled by their relevant suppliers and partners.

<sup>1</sup>We uphold the ILO Minimum Age Convention (no. 138), which sets the general minimum age for admission to work at 15 years (13 for light work) and the minimum age for hazardous work at 18 (16 under certain strict conditions). It provides for the possibility of initially setting the general minimum age at 14 (12 for light work) where the economy and educational facilities are insufficiently developed

<sup>2</sup>According to ILO Forced Labour Convention (no. 29), forced labour is any work or service performed under the menace of penalty, and for which the said persons have not offered up themselves voluntarily. There are three common forms:

- Prison labour: Work performed by individuals incarcerated by either the state or military that is a requirement of their sentence and usually without compensation.

- Indentured labour: Work performed by an individual contractually bound to an employer for a specific time period, which is usually in return for payment of travel and living expenses.

Bonded labour: An illegal practice in which employers give high-interest loans to workers who either individually or as an entire family then labour at low wages to pay off the debt.