

# Cheffelo Code of Conduct

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# Code of Conduct Cheffelo

This Code of Conduct (referred to as "Code") applies to all employees, managers, and members of the Management team of Cheffelo, contractors, interim and other temporary staff working for Cheffelo (all referred to as "employees" or "you").

# <u>People</u>

#### Culture

Our workforce should reflect the diversity of our customers, and everyone should have the same opportunity to develop within Cheffelo. We emphasize the importance of an inclusive culture, stressing that we are "better together". The Compass describes our corporate culture and our pledge to each other in our daily work.

#### Way of working

#### Discrimination and harassment

At Cheffelo, we aim to create equal opportunities for all, regardless of social identity. We do not tolerate any form of discrimination or harassment based on gender, ethnic background, nationality, religion, age, social class, parentage, civil status, disability, sexual orientation, health condition, membership in a trade union or political organization. If you feel that you have been the victim of discrimination or harassment, or if you witness discrimination or harassment occurring, please report it immediately to your manager, HR, or through our Whistleblowing form.

#### Health and safety

We are committed to the health and safety of all our employees. This includes following all relevant health and safety legislation and regulations and providing training and resources to help employees understand and manage potential hazards. Detailed information on Health & Safety at our production sites can be found in the Health, Safety and Environment Manual for our Production. If you have any concerns about health and safety issues in the workplace, do not hesitate to speak up and report them to your manager, HR or your local health and safety representative.

#### Human rights

We treat every person, we come into contact with or impact with respect and dignity. To guide us in our own operations and to guide our suppliers, we support the principles established under the <u>International Bill of Human Rights</u> and the <u>International Labour</u> <u>Organisation Declaration on Fundamental Principles and Rights at Work</u>. Our Supplier Code of Conduct outlines the standards and requirements we set for our suppliers and business partners.

### **Business**

#### Anti-bribery and corruption

We have zero tolerance for bribery and corruption, as we aim to conduct our business in an ethical way. Bribery is defined as but not limited to offering, giving, or soliciting something of value in exchange for something illegal, whereas corruption is defined as taking advantage of your position of power or authority for your own personal gain. As both bribery and corruption are illegal in the countries we operate in, any violation of these regulations can result in penalties for Cheffelo and/or the individuals involved.

#### **Conflict of interest**

As an employee of Cheffelo, you have a responsibility to report any actual or potential conflicts of interest to your manager or HR. A conflict of interest can arise when your personal interests, such as those of your family, friends, or political views affect your decision-making in relation to your job duties. Employees in Purchasing and Category need to be extra aware of these conflicts of interests as they routinely make business decisions on behalf of Cheffelo, and these decisions should not be influenced by personal interests. If an actual or potential conflict of interest arises, then you and your manager must make sure to evaluate the situation and take the necessary action.

#### **Protection of data**

#### Confidential and proprietary information

All employees must always ensure the confidentiality of confidential or proprietary information provided to them by Cheffelo or other companies, including Cheffelo's suppliers and customers both during and after employment. Confidential and proprietary information includes all non-public information as well as any information, which is considered to have commercial value to Cheffelo or could influence the valuation of Cheffelo or its stock.

#### Data protection and privacy

Our employees' privacy and protection of their data is important for us. Therefore, all information concerning this can be found in our Employee Privacy Policy.

#### Insider trading and inside information

As a listed company, we expect that employees with information that is deemed to be inside information (insiders) do not trade shares and do not share this inside information with others. Inside information is by definition non-public information of a precise nature which has the potential to have a significant effect on the company's share price. At Cheffelo, you can follow the following two rules to check if you have any inside information: 1) First rule, you will receive an email with a link and instruction to register (then do not trade shares and do not provide information to others), and 2) Second rule, ask the CFO if you have any doubts.

More information on our internal policies regarding this, can be found in our Information Policy and Insider Policy.

#### Legislation, rules, and regulations

As an actor in the meal kit industry, Cheffelo and its employees have a responsibility to comply with existing legislation, rules, and regulations. We follow and comply with rules and regulations including, but not limited to food safety regulations, labor regulations, competition regulations, anti-corruption regulations, trade regulations, and ESG regulations.

Surveillance within the landscape of legislation, rules, and regulations is assigned to specific positions within the company, and these functions have the responsibility to update staff on any new legislation, rules, and regulations as well as to inform the Management team of any potential breaches.

## **Compliance**

#### How to follow this Code

When any new employee, contractor, or manager of any entity at Cheffelo starts their collaboration with Cheffelo, they will receive a copy of this Code. They must then certify that they have received, read, and understood the Code and agree to comply with its terms. During the period of employment, the Code can always be found in our employee handbooks and on Sharepoint. All employees are expected to stay up to date in relation to the Code.

#### Whistleblowing and non-retaliation

You are expected to speak up if you see something that seems to conflict with this Code or if you have concerns about any aspect of our business practices. You can report concerns or violations to your manager, HR or through our confidential and anonymous whistleblower reporting form, Anonymous Report Form

(<u>https://form.jotform.com/230292332638050</u>). More information on this can be found in our Whistleblowing Policy. We take all reports seriously and will take appropriate action to address any issues arising.

Cheffelo strictly prohibits retaliation against employees who report violations of the Code or Cheffelo's policies in good faith or who cooperate in any investigation of improper conduct. Managers may not dismiss, demote, suspend, threaten, harass or in any other way discriminate against an employee who, in good faith, reports a suspected violation.

#### Non-compliance/violations

We all have a duty to act in accordance with this Code. Failure to comply with this Code may result in disciplinary action, including, but not limited to, verbal or written warnings, demotion, and termination of employment, subject to local legislation and regulations. Certain violations of the Code may require Cheffelo to refer the matter to law enforcement authorities for their investigation or prosecution of the matter. Any manager who directs, approves, or ignores any conduct that violates the Code or who is aware of such conduct and does not immediately report it, will also be subject to disciplinary action, even up to and including termination of employment.