

CODE OF CONDUCT

Kotányi GmbH



Code of Conduct of Kotányi GmbH

Dear employees!

We are living in a time of rapidly changing economic framework conditions and increasing worldwide competition among goods suppliers and service providers.

Therefore, it is important to companies like Kotányi, apart from providing a high quality in all products and actions, to maintain and further increase the trust of all stakeholders (consumers, customers, suppliers, authorities, ...) also by integrity and constant ethical behaviour of its employees.

Ethical behaviour means not only protecting the positive image of our brand and the reputation of our products, but we also want to commit to fair and correct actions and behaviour with respect to our colleagues, customers, business partners, consumers, society and environment on all levels. Trust and a good cooperation as well as high ethical and social standards are major principles which

are an integral part of our corporate values and thus also model for all our actions and behaviour. We firmly believe that the adherence to our corporate values “Passion, Creativity, Family spirit and Entrepreneurship” ensures the success of our company also in the future. A code of conduct is to help all employees of the company to behave responsibly and ethically in business and in daily interactions.

Our code of conduct is to sustainably embody the principles of behaviour which are important to us in our daily thinking and actions. Apart from ensuring that any relevant statutory regulation and the internal standards going beyond that are complied with, our code of conduct is to be used as guiding principle and guidance for business actions at all corporate sites of Kotányi GmbH and by all employees, executives and shareholders. The code of conduct must be available to and be known to all employees. Together with other organisational instructions, guidelines and regulations of the company, it ensures that we behave correctly and/or

do the right thing in business.

We absolutely wish that all employees understand and fully observe our code of conduct, wherever they are. We expect that our employees always show a good judgement, also in case of difficult decisions and even avoid the impression of inappropriate behaviour. Each employee is entitled and obliged to directly report any infringement against the rules of the present code of conduct which she/he observes or which she/he becomes aware of to the management, the Compliance Officer, the Group HR Director or anonymously.

We expressly state here that any infringement, especially in connection with offences, such as corruption and bribery is criminal pursuant to the applicable law and that any employee acting unlawfully may severely damage the company's image. We believe that we already merit the trust our stakeholders place in us. Together, we will be able to further increase this trust in the future for the benefit of the company and all persons involved.

We thank you for your support and cooperation relating to this topic which is very important for all of us.

Yours sincerely,

The group management



SPEDITIONS-BUREAU

JOHANN KOTANYI

ÜBERNAHME
aller Frachtgüter
aller Stationen

Expediti
KOTANYI
Hilfsmittel
N° 4

VERPACKUNGEN
Möbelverpackungen
Transport-
Anlagerungen

LOGOAC
VERTEILUNG

AC

Family Tradition

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Passion



1. Employees and executives

1.1 Diversity


We appreciate the variety of different opinions, cultures and ideas and get inspired by them. We are proud of the individual differences of our employees and regard the equal treatment of members of different groups as natural. Therefore, we firmly stand up against any type of discrimination and do not tolerate any discrimination on the grounds of origin, nationality, sex, religion or worldview, sexual orientation, pregnancy or parenthood, family status, age, disability or other reasons coming under the principle of non-discrimination.

Individual-related decisions, such as promotions, recruitment, salary increases, disciplinary measures will be made free from any discrimination. We regard equal opportunities as indispensable and promote a working environment in which the dignity and value of each individual is recognised, which is based on respect and tolerance and in which everyone is treating other persons honestly, sincerely and politely.

1.2 Harassment and bullying

We pursue a zero tolerance strategy with respect to any behaviour which can hurt privacy or personal feelings, even if this is only considered such by the respective person,

or which degrades or intimidates. This especially includes any type of sexual harassment, sexist behaviour, racist statements and psychological threats.



1.3 Corporate property and other items of property of the company

We attach importance to a responsible handling of corporate property of any type, including our intellectual property. Any working materials and items of property (e.g. mobile phones, computers, vehicles, credit cards, product samples as well as powers of authority, data, papers, documents ...) which are made available in connection with the employment relationship must not be used for one's own benefit or the benefit of third parties. Moreover, the relevant policies, such as for company cars or mobile devices are applicable. As a matter of principle, any type of misuse is prohibited, irrespective of the fact whether items of property of the company or property of third parties are damaged by it.

1.4 Individuals – data protection

The protection of personal data is a major concern for us. We commit to full data protection and respect the privacy of all employees, business partners and consumers. All personal data are subject to data protection and will be managed or destroyed so that any misuse can be excluded. We commit to only collect, process and use all personal data in a legal way and respecting the interests of the concerned persons to be protected.



Quality

1.5 Company – data protection

Any contracts not publicly accessible, price information, purchase conditions, sales conditions, specifications, formulations and other documents (sales plans, etc.) are subject to absolute confidentiality. They must only be disclosed to third parties in the company's interest or in the context of business purposes or regulatory actions and this must not be contrary to statutory requirements. Information which is not publicly accessible must be protected at any time, when leaving the workplace, but also outside of the workplace and beyond the working hours, even after termination of the employment relationship. We take every measure to prevent the loss of data, theft of personal data or any infringement of the copyright law.

We observe the suitable and prescribed security measures (passwords, licensed software...) which ensure the protection of intellectual property and personal data. We especially watch the contents of e-mails, attachments, stored voice messages and downloaded files to avoid that digital information is spread without

wanting it. Any confidential information must only be addressed to the specified recipients and is not forwarded internally or published. Especially employees having access to strictly confidential information must ensure that they are treated as confidential, also when talking to colleagues.

If confidential corporate data is transmitted to third parties, this is always subject to the requirement that a prior written release by the management must be obtained. Moreover, it must be checked whether a confidentiality agreement must be concluded. This decision is also to be made by the group management.

1.6 Relations to media

We do not give any press interviews or do not write any press articles in connection with the position within the company or the activities or products of the company without prior coordination with the management and without its release. Any unauthorised disclosure of confidential information on the company or its customers to third parties is strictly prohibited. Therefore, we immediately forward any media request to the management and ensure that there is only one authorised spokesperson for external communications. We do not respond to any questions from journalists – unless we are authorised to do so – but politely refer to the fact that the management must be contacted directly.

When using social media, we are always aware that we are responsible for our company's reputation. Therefore, we do not disclose any confidential or sensitive information. We respect the privacy of our colleagues and business partners.



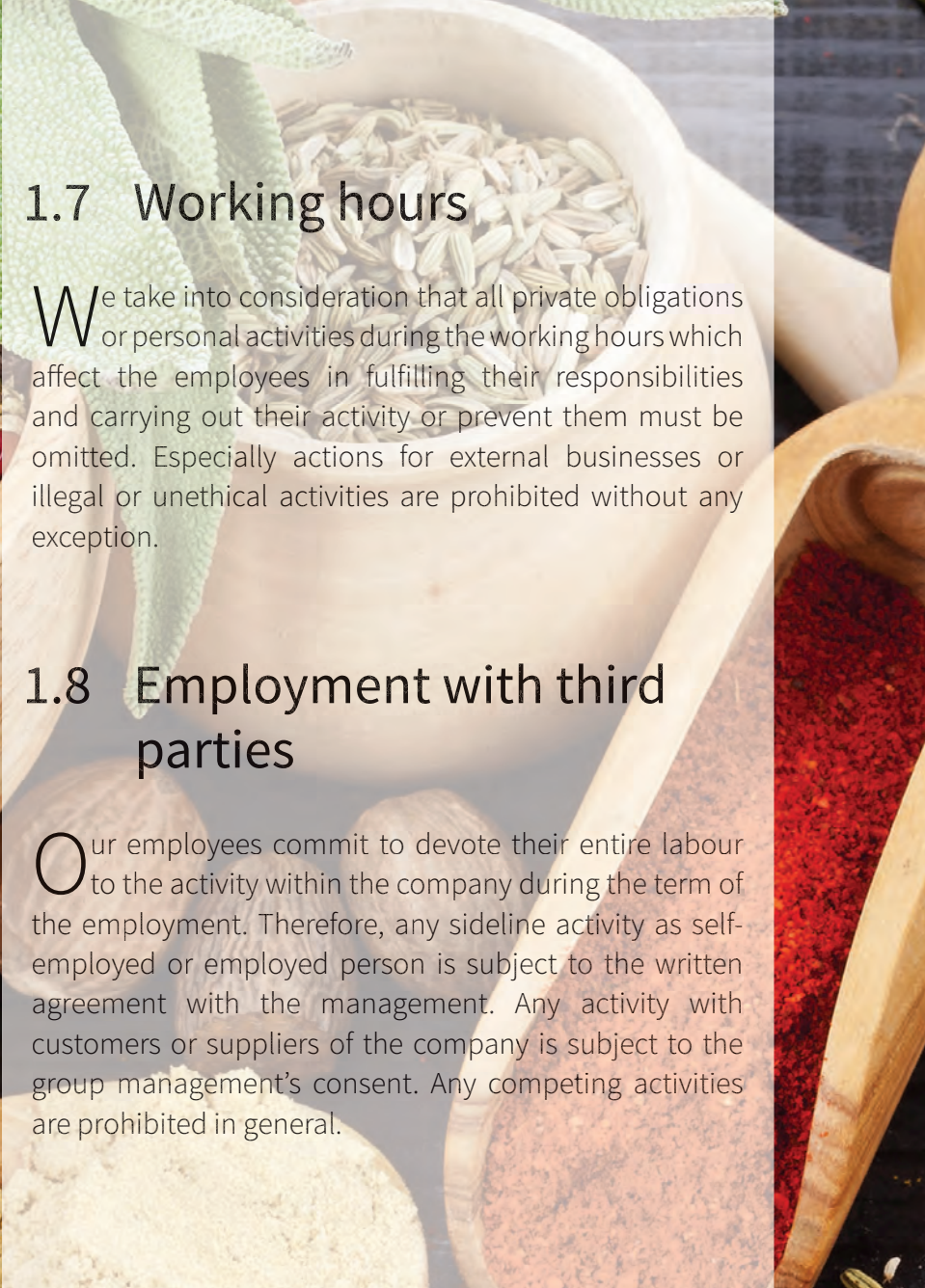


1.7 Working hours

We take into consideration that all private obligations or personal activities during the working hours which affect the employees in fulfilling their responsibilities and carrying out their activity or prevent them must be omitted. Especially actions for external businesses or illegal or unethical activities are prohibited without any exception.

1.8 Employment with third parties

Our employees commit to devote their entire labour to the activity within the company during the term of the employment. Therefore, any sideline activity as self-employed or employed person is subject to the written agreement with the management. Any activity with customers or suppliers of the company is subject to the group management's consent. Any competing activities are prohibited in general.



1.9 Non-cash benefits and invitations

We do not accept any cash gifts. We oblige to not accept any personal gift or invitation which could affect objective decisions for the benefit of the company, especially when choosing suppliers or in the relationship to business partners. Promotional gifts of a low value, gifts with a symbolic value or invitations to occasional business lunches or dinners which are customary at a place may be accepted.

Gifts of an excessive quantity (especially in the run-up to Christmas and during Christmas time) will be collected and distributed to employees in accordance with the respective occasion (e.g. by means of tombola).

If a gift which cannot be regarded as promotional gift of a low value or gift with a symbolic value or an invitation cannot be rejected for reasons of politeness (e.g. risk of being offensive or excluding circumstances under which the gift was handed over), we have been instructed to immediately report this fact to the management. Such gifts will be given to a charitable organisation or persons in a worse economic situation.

Any suspected attempted bribery must be reported to the management or the Compliance Officer.



1.10 Political activity or social commitment

All employees are free to be politically or socially active in private (e.g. Red Cross, animal protection...). We firmly stand up against any type of religious or political extremism or on the grounds of one's worldview and do not tolerate it neither within, nor outside of the company. Besides, we attach particular importance to the circumstance that political/social/religious activities are on no account pursued during the working hours, do not exert any influence on the work or the relationship to other employees and that neither the company nor its items of property or its reputation are misused for non-business purposes or interests.

1.11 Occupational safety and fair working conditions

We ensure a healthy and safe working environment for our employees. We especially expect our executives and any person commissioned by us to have implemented appropriate procedures and protective measures to fully ensure the occupational safety and protection of health. By ensuring fair working conditions, we mean payment and working hours at least in conformity with the relevant laws and fair leadership.





1.12 Openness and freedom of opinion

We encourage our employees to openly address issues without fearing any consequences. An open discussion atmosphere helps us to early recognise and correct and to reduce any incorrect behaviour. It is important to us to underline that every person can trustfully contact their superior or the management without any concerns, even when it comes to critical issues. We expect our executives to encourage an open dialogue of their employees and to examine any transferred information and messages in a fair way and without any prejudices.

We expressly reject any retaliation measures and attempted intimidation against employees who have reported a suspected incorrect behaviour to the best of their knowledge and belief and in good faith. By “to the best of their knowledge and belief” and “in good faith”, we mean a behaviour that is in line with the employees’ belief that their representation is true, even if it turns out later that this representation cannot be confirmed.



INDIA

CHINA



All over the World

2. Business partners and suppliers

2.1 Relations to customers and suppliers

We regard our customers and suppliers as partners with whom to enter into a long-term, fair and honest relationship. We treat these partners like we

want to be treated ourselves. We take fairness and an honest, respectful behaviour when dealing with customers, suppliers and consumers for granted.

2.2 Benefits to customers and suppliers

We reject any type of bribery or corruption in business relations to suppliers or customers. Benefits, such as in the context of invitations or in connection with promotional measures are admissible; however, the purpose of these benefits must by no means be to reward the business partner for an unobjective decision or to cause them to make this decision. This especially applies if the invitation has not exclusively objective reasons, meaning that if

the person invited has no objective business interest in the invitation, but a purely personal interest.

Such benefits must not have an inappropriately high value. The limits of what is customary in business and of the usual life standard of the recipient must by no means be exceeded disproportionately.

2.3 Compliance with the applicable cartel and competition law

We are committed to fair competition. Any restriction of free competition distorts the market and inhibits the general economic development. Kotányi wishes to be successful in competition by means of passion, innovation, entrepreneurship and creativity as well as quality, reliability and fairness. Preserving the corporate values and observing national and international statutory requirements are fundamental principles of our company. As a globally operating company, we strive to comply with the full contents of all relevant cartel and competition

laws to be perceived as a company with a high level of integrity.

All employees commit to observe the regulations of our compliance manual. However, we also expect our suppliers to not take any measure which is in breach of the principles of our code of conduct. The compliance with the “Code of Conduct for suppliers of Kotányi GmbH” is prescribed in every supply agreement.

2.4 Data acquisition

When collecting information on competitors, suppliers, customers and natural persons, we observe the respective laws and obtain such information from official entities (economic chambers, polling institutes ...) or publicly accessible sources (Internet ...), respectively.





USA

MEXICO

BRASIL

INDIA

CHINA

Inspiration





Dill

Parsley

Rosemary

Arugula

Thyme

Cilantro

We care

3. Environment and society

3.1 Biodiversity

We know and have internalised the principles of our Corporate Social Responsibility (CSR) policy. According to our embodied CSR, we will take any measure available in the context of our economic power to also preserve resources for the next generations. The

protection of biodiversity and a responsible use and procurement of natural resources in the development and manufacturing of our products influence our decisions.

3.2 Work and social standards

We commit to the core labour standards of the International Labour Organisation (ILO) and want to implement the basic principles defined therein in the context of our possibilities also in cooperation with suppliers and business partners. Moreover, we take the compliance with the fundamental employee rights, the provisions of the occupational safety

and protection of health in accordance with the respectively valid national legislation for granted just like we request our business partners to implement the same.

3.3 Local legislation

Kotányi is subject to the legislation and jurisdiction of many countries. We take the compliance with all applicable statutory requirements for granted. We expect our executives to know the fundamental laws, regulations and in-house requirements which are relevant to their area of responsibility and to ensure, as a model for their employees, that these are fully complied with. If any provision of the present code of conduct is in conflict with a law, the law will prevail.

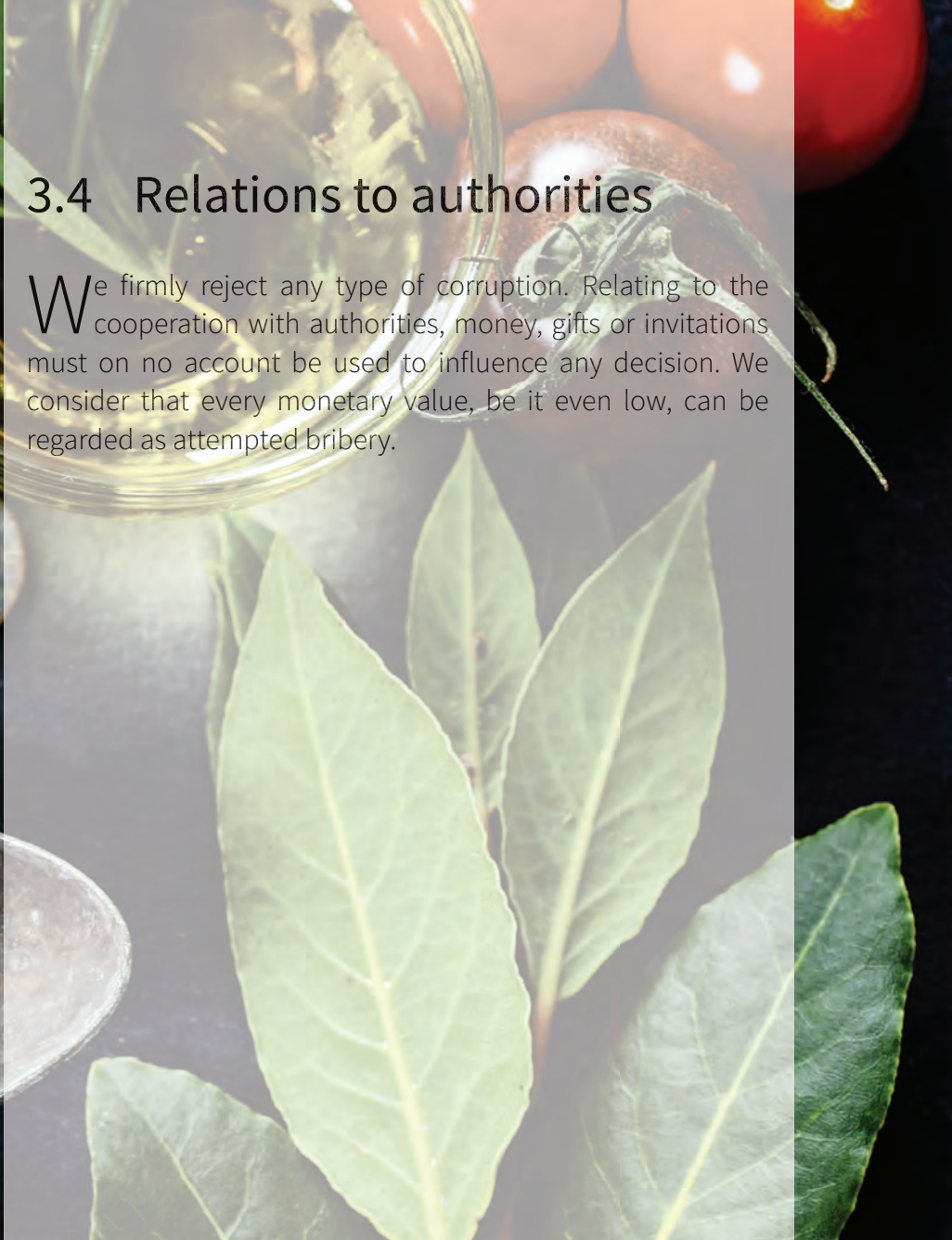
Written or oral regulations in individual contracts must never be contrary to the applicable law. There might be stricter requirements in individual countries or on certain markets than those defined in our code of conduct. In these cases, the stricter requirement must be observed as a matter of principle. If there are doubts relating to the legal appropriateness of a decision, the Compliance Officer or management must be consulted.





3.4 Relations to authorities

We firmly reject any type of corruption. Relating to the cooperation with authorities, money, gifts or invitations must on no account be used to influence any decision. We consider that every monetary value, be it even low, can be regarded as attempted bribery.





Spices



4. Products and processing

4.1 Product safety and authenticity

In the context of our due diligence, we fully ensure that our products and packages neither present any defects, nor properties which might impair the health of our consumers. We take every measure, from the selection of our suppliers, to strict quality and

hygiene requirements in the entire manufacturing and storage process to the delivery to our customers, to be certified to the highest level according to the International Featured Standard (IFS) every year.

4.2 Product labelling and design

We consider the declaration in conformity with the relevant laws and omitting any type of misleading information for consumers an obligation. Referring to our products, we always provide correct information to prevent that any damage is inflicted on our customers or our image.

We ensure that our products observe the statutory labelling requirements in all countries supplied by us. The design and the information provided on the packaging are to enable our consumers to safely use our products and inspire them to cook with creativity.

4.3 Product quality

We strive to provide our consumers with products which meet our high quality standard. Before being launched on the market, our products undergo comprehensive examinations and sensory testing. We exclusively source our products from suppliers which have been approved according to a strict selection procedure and are continuously being assessed with respect to their suitability. Even before the goods are delivered, we check that only packaging, raw materials and auxiliary materials of a high quality which meet our sourcing standards are delivered.







Herbs



5. Observing the code of conduct

The following questions help us to correctly evaluate an imminent decision or action in terms of ethics:

Does this decision / action contradict to any law?

Is this decision / action in line with the code of conduct and internal guidelines, respectively?

Can I take a look at myself in the mirror and have a clear conscience, after having made this decision / taken this action?

How would my family or friends react if they read about this decision / action in the headlines tomorrow?

If we are in doubt even for one question, we contact our executive, the management or the Compliance Officer.

6. Implementation

The management, supported by the Compliance Officer, is responsible for the administration of the code of conduct. All employees must sign a statement or endorsement to their employment contract confirming that they have read the code of conduct and committing to observe the provisions defined therein. The code of conduct is controlled by the Kotányi quality management system and therefore published in the respectively valid version in the Intranet and Internet.

We commit to immediately report any infringement or questionable behaviour. These may also be reported anonymously to an internal trusted representative (e.g. employees' representatives) or the Compliance Officer or Group HR Director.



7. Further applicable documents

The code of conduct cannot comprehensively regulate all areas of the business activity of Kotányi and all forms of behaviour within the company. Therefore, in addition to sound judgment and common sense, further local or international, individual or collective arrangements are applicable to all employees and executives, all managers and shareholders.



rika-Mühle Siegedin.

Notes



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