



# Code of Conduct



OUR PURPOSE

*Feeding  
the Future*



# Introduction

At Nutreco, our strong values guide what we do and how we do it. We always aim to treat others with care, integrity and openness, and expect colleagues throughout the company to live these principles in our day-to-day work. Every one of us is required to make thousands of decisions each day as we go about our business – big and small, straightforward and sometimes more complex. It's these complex decisions that this Code of Conduct will help us to manage in a thoughtful way by making the company policy clear and providing practical guidance.

I'm committed to ensuring that we all have the tools we need to help us act not only in line with the law but honestly and ethically. The Code will help us hold ourselves and each other accountable for both our results and how we achieve them. It is aligned with SHV's Ethics & Compliance ambitions and outlines what our company stands for, how we do business and how we should behave towards each other. It also points us towards more detailed policies, procedures and tools we may need to consult on certain topics mentioned in the Code and tells us where to find them.

Even with clear guidance, we will always encounter dilemmas, when it is difficult to tell right from wrong. If you encounter a dilemma, remember you are not alone – always make sure to discuss and resolve it with the help of others. Bring your dilemmas to management at the appropriate level, to Human Resources, to Ethics & Compliance (E&C) or to Legal, and your colleagues will help you determine the best way forward.

Part of acting ethically is also having the courage to speak up when we see behaviour that we know or suspect is wrong. You can consult the same colleagues who will help you handle dilemmas, or use our whistleblower line "Speak Up" to report any violations of our Code. Be assured that we do not tolerate any retaliation against those who report violations in good faith.

This Code is intended to help each of us act in a compliant and ethical way, and for that reason, it is an important part of your employment relationship with Nutreco. Please read it carefully and ask questions if anything is unclear, as it is important you fully understand the Code. I expect you to follow its principles and rules in everything you do.

**Fulco van Lede**  
CEO Nutreco



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## What is the Code of Conduct?

Our Code defines what we believe is the right way to do business. When you act consistently with this Code, you know you are behaving in accordance with our values and company policies and in compliance with the law.

## Who is the Code of Conduct for?

Our Code applies to all employees of Nutreco worldwide, regardless of their job or seniority level. It also applies to all employees working in joint ventures over which Nutreco has management control.

## How does the Code fit with our purpose, values and policy framework?

OUR PURPOSE  
*Feeding  
the Future*

TRUST INCLUSIVITY  
CURIOSITY INTEGRITY PASSION



### **Our purpose**

What we see as our goal



### **Our values**

How we behave to achieve our goal



### **Our Code of Conduct**

Our standards for business and personal conduct



### **Our policies**

Detailed instructions and processes that help us adhere to our Code

# What is expected of me?

This Code sets high standards of integrity and conduct for everyone who works at Nutreco. All employees must comply with this Code and the policies and procedures connected with it.

## As an employee you must be knowledgeable and aware

- Understand and practise the requirements of the Code.
- Learn the details of the policies relevant to your job.
- Acknowledge that even when something might be a common practice in your location or within your cultural norms, the requirements of our Code must prevail.
- Speak-up if you notice or suspect any breaches of this Code.

## Someone else's direction or approval is no excuse for wrongdoing

- If you are asked or receive management approval to do something that violates our Code or policies, this is wrong and you must report it immediately.

## As a leader you should drive a culture of ethical behaviour

- Demonstrate your commitment to integrity, not just through your words, but, more importantly, through your actions.
- Make sure your team members understand that business results are never more important than compliance with the law and our policies.
- Create an open environment where every employee feels comfortable raising concerns.
- Handle employee concerns appropriately and promptly.
- Engage with your teams on the importance of compliance, with sincerity and conviction, whenever you have an opportunity.
- Look out for business processes in which compliance risks may not be adequately mitigated and report these to E&C.
- Act promptly when compliance weaknesses are detected.





# Compliance with laws and regulations

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We comply with the laws, rules and regulations of the countries where we operate. If a conflict exists between a law and this Code, the law prevails over this Code. If this Code sets higher standards than local law, cultural norms or business practices, this Code prevails.



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- If in doubt: ask
- Raise your concerns and Speak Up!

# Business conduct



# Fair competition

**Our business success is based on the quality of our products, services and people. We support free and fair competition and abide by the laws that protect it. We will only enter into agreements, understandings or engagements that are permitted under applicable competition laws.**

## Dealing with competitors

- As a rule avoid contact with competitors as much as possible.
- If contact is unavoidable, never exchange any commercially sensitive information such as:
  - Pricing or pricing policy
  - Market share
  - Production, sales capacity or volume
  - Costs, profits or margins
  - Customers, suppliers and sales territories
  - Terms and conditions of sale
  - Sales, marketing or development strategies
  - Promotion, loyalty or rebate programs
  - Strategic processes or plans such as M&A activity, plant extensions or closures
- If a competitor attempts to communicate on any of these topics, stop the conversation immediately, actively remove yourself from the situation (by leaving the meeting) and report the incident to E&C or Legal.

- There may be legitimate reasons to communicate or meet with competitors, for instance to discuss potential forms of cooperation or M&A transactions. On these occasions commercially sensitive information may need to be exchanged. Before communicating or meeting with a competitor for this purpose, you need written approval from next level management. E&C will advise in writing before a decision is taken.

## Dealing with suppliers and customers

- Seek advice from E&C or Legal when you wish to enter into exclusive or restrictive agreements with suppliers or customers.
- Understand that resale price maintenance is illegal in most countries and stick to recommended resale prices only.
- Nutreco's suppliers or customers may also be competitors or part of larger companies that compete with Nutreco. In these cases, you must only exchange information that is required for the existing business relationship. You do not need prior approval to interact with this type of supplier or customer as long as you understand what is appropriate to discuss. If in doubt consult E&C or Legal.





### Trade associations

- Take extra care at trade associations, industry meetings and fairs. While attending these is a perfectly legitimate activity, they also offer competitors a place to meet and improperly align businesses, particularly at pre- or post-event meetings.
- You need to obtain written approval from next level management to join and attend meetings of a trade association. E&C will advise management in writing on the conditions for you to participate.

### Care in communication

- Take great care in communicating, by email, letter or memo.
- Avoid language that could convey the wrong suggestion of anti-competitive conduct.
- If what you write could be misinterpreted, give more context or choose different words.
- Remember that electronic communications such as email may be retrievable for an indefinite period of time, even if you think you have deleted them permanently.
- Bear in mind that everything you communicate may become evidence in case of a lawsuit.

### Market intelligence

- Obtaining information about the competition can have a pro-competitive effect as it enables us to better understand where we can improve our offering.
- Use publicly available resources to obtain market intelligence, such as media reports, trade journals, annual reports and market reports made by third parties.

- You may also use information on competitors provided by customers or suppliers in the context of meeting competitive offers, but caution is required.
- You may never directly or indirectly (via a third party) obtain sensitive information from a competitor. If in doubt, consult E&C or Legal.

### Q&A

I have a friend who is a sales person working at a competitor. Sometimes we talk about marketing plans. Is this a problem?

Yes it is. In a conversation like this it is easy for you to reveal commercially sensitive information and violate competition laws that forbid discussions on marketing and pricing.

I want to meet with a company to determine if they can become a Nutreco supplier. This company however is also a competitor. Am I allowed to meet with them?

There may good reasons to meet with this competitor. However authorities are generally suspicious of such meetings. Take care, and make sure the meeting is allowed by competition law. If in doubt consult E&C or Legal.

For further guidance please refer to:

[Nutranet](#) > [Policy House](#) > [E&C](#) > [Fair competition](#)



# Trade sanctions

As a global company, we may produce, sell or export our products in or to countries that are subject to trade sanctions. We comply with all applicable trade compliance laws and regulations.

## Our policy

- Only OpCos that have been authorized by the Nutreco Management Board may do business with parties located in sanctioned countries. A list of sanctioned countries is available on Nutranet.
- Authorized OpCos must meet certain compliance requirements.
- All OpCos are forbidden from doing business with certain heavily sanctioned countries. A list of these countries is available on Nutranet.
- For further details, contact E&C or Legal.

For further guidance please refer to:  
[Nutranet > Policy House > E&C > Trade Sanctions & Export Controls Policy](#)

# Financial records

We keep clear, complete and up-to-date records that accurately reflect our business transactions and company assets.

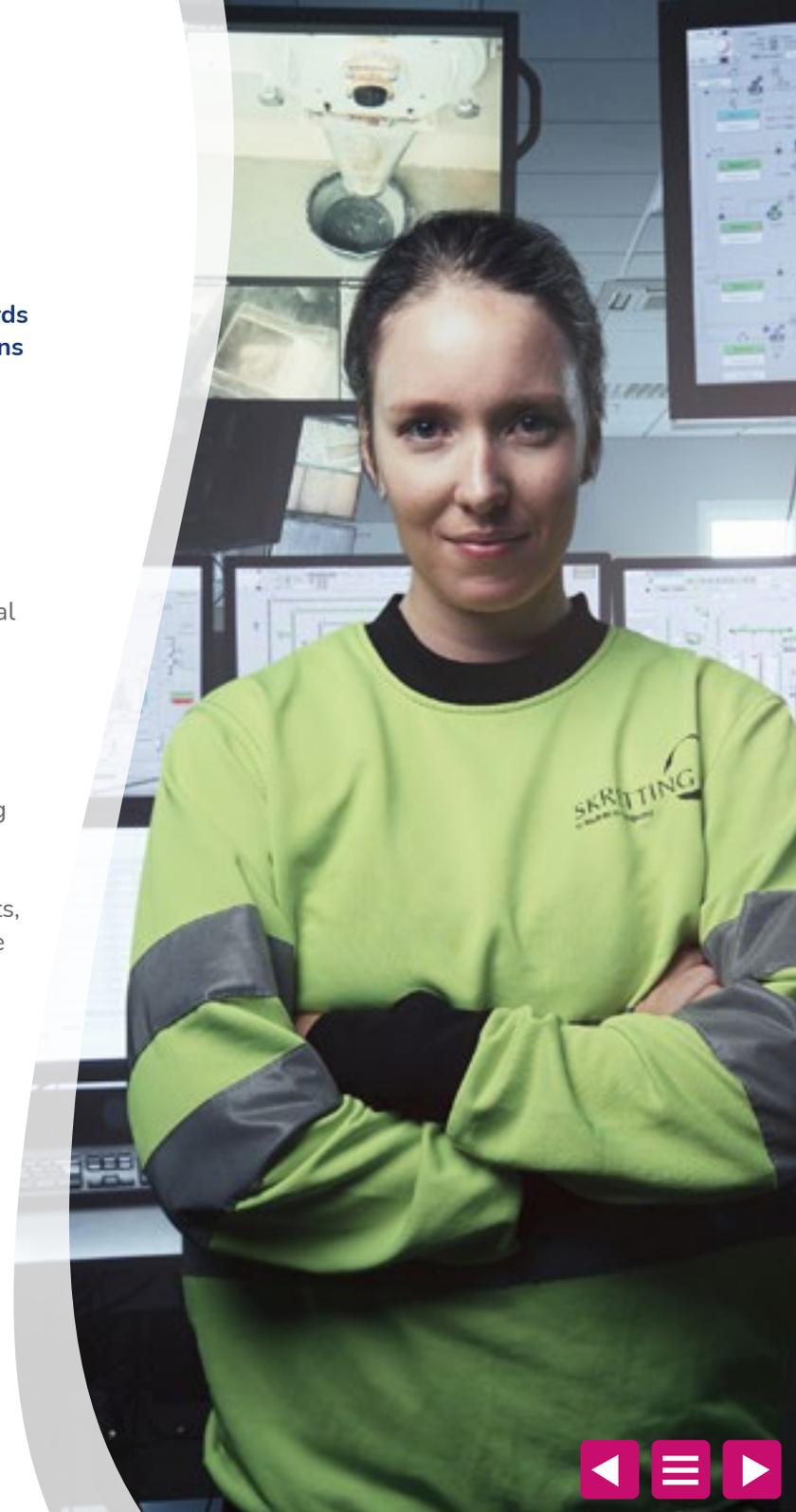
## Our policy

- We comply with applicable laws, generally accepted accounting principles and our internal accounting procedures.
- We don't keep "off the books" or secret accounts.

## Q&A

I am not working in a financial role. Is accounting integrity still my responsibility?  
> Yes, proper record-keeping is a responsibility we all share. You may work with expense reports, test data and sales invoices: all of these must be accurate, complete and properly recorded.

For further guidance please refer to:  
[Nutranet > Policy House > Finance > Nutreco Accounting Manual](#)



# Corporate Sustainability

**We contribute to greater sustainable protein output in the feed-to-food chain. Our businesses look for opportunities to create shared value for the benefit of our entire industry and society as a whole.**

## Our sustainability program

- Nuterra is our comprehensive sustainability program.
- It is aligned with and contributes to eight of the United Nations' Sustainable Development Goals.
- The Nuterra Sustainability Roadmap sets clear targets, measures progress and assesses the environmental impact of our nutritional solutions.

## Your role

Each of us has a role to play in making Nutreco a more sustainable business. You can help by:

- Ensuring that all of Nutreco's direct suppliers sign a procurement contract. This contract refers to our Code of Conduct for Business Partners which includes Nutreco's sustainability criteria.
- Driving transparency in sustainability by reporting progress and challenges to the Nutreco Sustainability Platform.
- Actively promoting and engaging in the Nutreco Global Community Day in your local community.
- Actively working on reaching the Sustainability Roadmap targets within your workplace and community.
- Encouraging customers, suppliers and other external stakeholders to read Nutreco's Annual Sustainability Report to help us create shared value on the sustainability challenges we face.
- Advocating for responsible and sustainable activity in your workplace and local community.

For further guidance please refer to:  
[Nutranet](#) > [Policy House](#) > [Sustainability](#) > [Nuterra](#)



# Personal conduct





# Gifts, hospitality and entertainment

**Gifts and hospitality can help build business relationships, but may become bribes if offered or accepted in return for a favour or business advantage. We do not allow bribery or facilitation payments to be offered or accepted in any of our business dealings around the world, with both governments and the private sector.**

## Use common sense

Always ask yourself if offering or accepting a gift or invitation could (be seen to) improperly influence you or someone else in making business decisions.

## What you should know

**Bribery** means giving, offering or promising anything of value to influence a business decision.

**A gift** can be an object, cash payment, voucher, gift card, favourable loan or anything else of value.

**Hospitality** may involve lunches or dinners, entertainment, sports events, travel or lodging.

**Facilitation payments** are small amounts paid to public officials to expedite routine or administrative actions such as issuing licenses or visas.

## Gifts and hospitality for public officials

- Do not offer any gifts, apart from Nutreco-branded promotional materials of limited value, to public officials or their families.
- Hospitality must be of reasonable value and permitted under local laws and regulations.

## Gifts for or from business partners

- Never offer, ask for or accept a gift to obtain an improper business advantage.
- Ensure that you don't violate the national laws or the known policy of the recipient.
- Take extra care during sensitive periods such as negotiations, a tender phase, or legal proceedings.
- Gifts in the form of cash or cash equivalents (such as gift cards, vouchers and securities) are not allowed.
- Gifts offered or accepted may not exceed €100 in value. Per business partner, gifts may not be offered or accepted more than four times per year.
- If a gift that does not comply with these rules cannot reasonably be refused, you may accept it if it does not immediately trigger any return gift or action. However, you must inform next level management promptly and you may not keep the gift yourself.

## Hospitality for or from business partners

- Offering or accepting hospitality is allowed if it is of reasonable value, fosters business relationships, displays good taste, does not violate the known policy of the recipient and is extended as a matter of courtesy.
- Business partners visiting Nutreco facilities or events may be offered reasonable, proportionate travel and lodging. Only offer the same to spouses and family members if this is appropriate.

## Deviations require approval

- Any deviation from these rules requires prior written approval from next level management following written advice from E&C.

### Exception in extreme situations

If you need to make a payment to avoid an immediate and genuine threat to the health, safety or illegal detention of yourself or a colleague, you are allowed to do so. Report the payment immediately to next level management and E&C.

### Third parties

- In addition to not paying or accepting bribes ourselves, we also need to make sure that third parties do not pay or accept bribes on our behalf. For this reason we have adopted the Third Party Due Diligence Policy that helps us assess the risks related to certain categories of third parties and take precautionary measures to manage these risks.
- This policy applies to the following third parties:
  - Sales agents
  - Customs agents
  - Advisors representing Nutreco
  - Intermediaries
  - Joint venture partners
  - Participations (non group companies in which Nutreco holds shares)
  - Third-party lobbyists
- Relationship owners must ensure that proper risk mitigating actions as set forth in the Third Party Due Diligence Policy are taken. E&C can support executing these actions.



### Sponsorships and charitable donations

- Sponsorships involve supporting organizations or events to promote the Nutreco brands and businesses.
- Charitable donations (in cash or in kind) are given to non-profit organizations with no expectation of direct corporate benefit.
- Sponsorships and charitable donations must:
  - Meet the requirements set out in the Nutreco Anti-Bribery and Corruption Policy
  - Be approved in writing by next level management following advice from E&C

For further guidance please refer to:

[Nutranet > Policy House > E&C > Anti-Bribery & Corruption Policy](#)

[Nutranet > Policy House > E&C > Third Party Due Diligence Policy](#)

### Q&A

One of our vendors offers me tickets to a concert that she can't attend.

Can I accept them?

> No. Even if the tickets fall within the €100 limit, the event doesn't offer an opportunity to enhance your relationship with the vendor, since she will not be attending with you.

A consultant I regularly work with asks me to join him at a sports event. Can I accept?

> Yes you may, provided the arrangement is of modest value and is not intended to influence a business decision.

A government employee asked if I can help his daughter get an internship at Nutreco. He says this would facilitate our relationship.

> Be careful. You can provide the government employee with information about the internship and allow his daughter to apply in the same way that other candidates do. Don't give her any form of preferential treatment.

While stranded at the border, a customs officer offers me a fast-track entry in return for some cash. Is this OK?

> No. This appears to be a facilitation payment. The situation would be different if there was an official fast-track service for which you would get an official receipt.



# Politics & governments

## Political support

- We observe neutrality with regard to political parties and their candidates. As a company, we do not make contributions to local, regional or national political fundraising events.
- However, Nutreco recognizes your right as an individual to participate in the political process on your own time and at your own expense.

## Lobbying

- Lobbying activities seek to influence a political decision-maker or legislator on a certain issue. They must be done openly and truthfully and never involve gifts, entertainment or donations.
- Lobbying activities by employees require prior written approval from next level management following written advice from E&C.
- Lobbying activities involving a third party require prior written approval from the Nutreco management board following written advice from E&C.

For further guidance please refer to:

[Nutranet > Policy House > E&C > Anti-Bribery & Corruption Policy](#)





# Conflicts of interest

**The business decisions we make should never be based on our own private interests. We must always seek to avoid real or perceived conflicts between our private interests and our professional responsibilities. Conflicts of interest must be reported immediately.**

## Examples

Conflicts of interest may arise when personal interests affect (or appear to affect) our ability to make impartial business decisions. Typical examples include:

- Having a financial interest in one of Nutreco's business partners or competitors
- Doing business on Nutreco's behalf with someone you have a close personal relationship with
- Taking for yourself a business opportunity that is meant for Nutreco, or passing it on to someone else
- Recruiting or supervising family members or close friends

## Your role

- Avoid situations of (real or perceived) conflicts of interest as much as possible.
- Do not engage in decision-making that creates a (real or perceived) conflict of interest.
- Do not give preferential treatment to family members or close friends.
- Disclose (potential) conflicts of interest in writing to your next level management.

Management will provide you with a written decision, following written advice from E&C.

## (Supervisory) board positions

Seek approval from your next level management for (supervisory) board positions or advisory roles that could conflict with your responsibilities as a Nutreco employee. A written decision will be taken after written advice of E&C.

## Romantic relationships

Romantic relationships can become an issue if the employees concerned work in the same reporting line. In these cases, both employees must disclose their relationship to HR or next level management so the possible implications can be assessed and any necessary arrangements made.

## Remember

A conflict of interest is not necessarily a breach of this Code, but failing to promptly disclose a conflict is a violation.

## Q&A

I am looking for a new supplier. A friend of mine owns a company that is well-positioned to supply Nutreco. May I engage with her?

> No, you may not engage with her personally. You may introduce your friend to a colleague, who can treat her as any other possible supplier. You may not be involved in the decision-making process.

I have been offered a role in the supervisory board of another company. Am I allowed to accept this role?

> Before you accept, you should first disclose this offer to next level management. You may only accept this role after your manager has approved, following written advice from E&C.

For further guidance please refer to:  
[Nutranet](#) > [Policy House](#) > [E&C](#) > [Anti-Bribery and Corruption Policy](#)



# Product Safety

Nutreco's sustainable development is based on product safety, quality and integrity. By complying with regulatory requirements and our internal standards we protect people and animals from hazardous substances.

## Our safety and quality program

- Nutrace is our company-wide proactive program to ensure feed-to-food quality and safety.
- It safeguards the quality of Nutreco products and services and complies with legislation. It helps us meet customer demands.
- We inform our customers through clear labelling and product-documentation so that they can safely apply our products.
- We handle any safety related complaints seriously and ensure that they are properly investigated. If required we report to the appropriate regulatory authorities.
- We share information on food and feed safety matters both internally and externally.

## Your role

- Be alert for situations that could lead to our products being compromised.
- If you see or suspect something that could negatively affect the safety or quality of our products, speak up and report it immediately.

For further guidance please refer to:  
[Nutranet](#) > [Policy House](#) > [Product Safety](#)



# Workplace environment

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# Workplace environment

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We are committed to providing a safe, collaborative and inclusive workplace environment where employees and business partners are respected and appreciated.

## Diversity and inclusion

- We attract, develop and retain a workforce that is as diverse as the markets we serve.
- We promote diversity and inclusion by:
  - Respecting the mix of each other's talents, abilities and experiences
  - Valuing each others' input
  - Fostering an atmosphere of trust, openness and sincerity

## Non-discrimination / equal opportunities

- We recruit, treat, promote and compensate employees and job applicants based on merit, qualifications and job-related performance.
- We do not discriminate with regards to gender, race, religion, age, disability, sexual orientation, nationality, political opinion and social or ethnic origin.

## Anti-harassment

- We seek to provide a working environment that is free from harassment and disrespectful conduct.
- Harassment includes unwelcome verbal, visual or physical behaviour that creates an intimidating or offensive environment.
- Examples include:
  - Rude language or jokes
  - Intimidating or threatening behaviour
  - Degrading comments
  - Hostility towards others because of individual characteristics
  - Unwelcome sexual advances or remarks
- You can help by always treating others the way you would like to be treated.

## Freedom of association

- We respect every employee's right to join a trade union or to have recognized employee representation in accordance with the law.
- We recognize the right to engage in collective bargaining.

## Compulsory and child labour

- We will not use child labour or any other form of compulsory labour.
- The minimum age for entering into employment or working should not be less than the age for completion of compulsory schooling as provided by national law and, in any case, should not be under 15 years old.
- We comply with the International Labour Standards.

## Minimum wage

All employees are entitled to the legal minimum wage, as published by the government in the countries where we operate.

### Alcohol, drugs, weapons and tobacco

- We do not tolerate working under the influence of drugs or alcohol.
- Consumption of alcohol is forbidden in all production plants. In other Nutreco locations alcohol consumption is only allowed outside of working hours.
- You are expected to perform your job free from any substance that could impair your job performance (such as medication).
- We do not permit firearms or any other weapons on our locations without prior written approval of OpCo management following written advice of E&C.
- Smoking is prohibited in all our working areas, offices and plants.

### Q&A

My manager often loses his temper and yells at people. Is that harassment?

> It depends, but, in any case, the situation creates a negative working environment and should be addressed. Share your concerns with HR or E&C or leave a message with Speak Up.

One of my colleagues emailed an inappropriate joke to me and some teammates. I find it offensive. What should I do?

> Offensive behaviour is not acceptable. If you feel uncomfortable speaking with your colleague directly, contact your manager, HR or E&C or leave a message with Speak Up.

For further guidance please refer to:

[Nutranet > Policy House > HR > Global Human Resources Policy](#)

### Health, Safety and Environment

We strongly believe that zero harm is possible.

We are committed to:

- Safeguarding the health and safety of our employees, contractors and visitors.
- Caring for the environment by not wasting finite resources.

### Your role

- Be trained and adhere to the Nutreco HSE Policy, standards and procedures.
- Address gaps and engage with colleagues on safety matters.
- Take a minute to evaluate the risks and ensure that the work can be executed safely.
- Keep the work area safe, clean and tidy, to prevent slip, trip and fall accidents.
- Strictly respect the Life Saving Rules on site
- Adhere to traffic rules.
- Do not text or read emails on your phone while driving. Only call handsfree.
- Use the personal protective equipment as per job requirements.
- Use the correct equipment and tools to perform the task safely.
- STOP a task if you feel that safety is not adequate, report and wait until a competent person takes appropriate risk control measures.
- Act with respect and challenge any unsafe conditions and unsafe acts you see or perceive.
- Report any incident, including near miss or hazardous situations, and leverage it to learn and avoid recurrence.
- Recognize and report positive behaviors.

For further guidance please refer to:

[Nutranet > Policy House > HSE Policy](#)



### Travel security

When travelling for work, Nutreco wants its employees to be as safe as possible. The Travel Policy provides clear instructions to limit risks.

- Travel only if essential and if other means of collaboration (such as online meetings) are not sufficient.
- All flights must be approved as provided in the Global Travel Policy.
- All flights must be booked via Nutreco Procurement approved travel agencies.
- Travellers must consult the country/regional information and risk ratings provided by external sources (International SOS, BCD TripSource and local health authorities).
- Travelling to countries or regions with a high (red) or extreme risk rating (dark red) as defined by International SOS must be approved as provided in the Travel Policy.
- Travellers must comply with country entry restrictions, local governmental rules and health instructions.
- Take medical precautions such as vaccinations.
- Download the International SOS App. In case of an emergency use the contact details provided there.

For further guidance please refer to:

[Nutranet > Policy House > HR > Travel Security Policy](#)



# Protection of assets and information

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# Company property and confidential information

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Our property consists of real estate and equipment, IT systems (such as laptops, mobile phones), intellectual property (patents, trademarks and brands) and confidential information (know-how, formulations, business plans and supplier or customer details), among other things. We are all responsible for protecting company property.

## A. Protect our property and systems

- Keep the IT equipment that is assigned to you in secured places.
- Immediately report any property that is lost, stolen, damaged, unsafe or in need of repair.
- Only install software and applications that comply with the Nutreco IT User Instructions.

## B. Protect our confidential information including intellectual property

- Confidential information is information that is not available to the general public and might be of use to competitors or harmful to Nutreco, if disclosed.
- Safeguard Nutreco's confidential information from unauthorized disclosure and misuse.
- Confidential information may only be accessed, used or shared to the extent necessary to fulfill your job duties.

## C. Social media

- In social media, refer to Nutreco in a professional way. Do not share pictures or videos of the inside of our premises.
- Obtain permission from colleagues before posting any images of them.
- Do not speak on behalf of Nutreco unless you have been authorized to do so.

## D. Personal use of company property

- Limited personal use of our company IT resources is permitted if it does not have a negative impact on the day-to-day operations of the business.
- Personal use must not involve illegal, sexually explicit, discriminatory or otherwise inappropriate material and/or activities such as gaming.
- Nutreco reserves the right to monitor the use of our IT systems and information without prior notice and to the extent permitted by law.
- Personally owned devices (BYOD) used to process and/or store Nutreco information must comply with the Nutreco IT User Instructions.

For further guidance please refer to:  
[Nutranet > Policy House > IT > IT Users Instructions](#)  
[Nutranet > Policy House > Communications > Social Media Policy](#)



# Personal data

**We respect the privacy of our employees, customers, suppliers and business partners. We only collect and use personal data that we need for our business. We treat personal data with care and process it safely. Nutreco has appointed a Group Privacy Officer, who oversees our data privacy programme.**

## Processing of personal data

- For data privacy the key concept is “processing of personal data”.
- Personal data is any information that relates to a person who can be identified - such as a name, address, email, etc.
- The processing of personal data covers all of the actions you take with this data, including collecting, storing and deleting data.

## Your role

Always ask yourself if the data you are processing is personal data. If so, keep the following in mind:

- Only collect and process personal data that you really need.
- Only share personal data with people who need it to perform their jobs.
- Keep the personal data that you process up-to-date.
- Delete any personal data that you no longer need.

- Make sure that individuals whose personal data we collect are well-informed about how this data is processed.
- Take appropriate (IT) security measures to protect the personal data you process, from the moment you collect it until the moment you delete it.

## Be aware

- Always report possible data breaches at [privacy@nutreco.com](mailto:privacy@nutreco.com). A data breach occurs when personal data (1) is permanently lost or (2) ends up in the hands of the wrong person outside the company in a way that could lead to misuse.
- Individuals have the right to access their personal data and have it corrected or removed. Any requests must be forwarded to [privacy@nutreco.com](mailto:privacy@nutreco.com).
- When a third party processes personal data on behalf of Nutreco, ensure that a proper data processing agreement is in place.

## Q&A

I would like to send a newsletter to all my customers. Is this OK?

> Yes, as long as it is sent exclusively to existing customers. For prospective customers, you would need to ask them first before sending them a newsletter or other information.

To celebrate the successful completion of a major project, a supplier would like to send a personalized thank you gift to the home addresses of the project team members. Can I share the names and home addresses of the project team members with the supplier?

> In a situation like this, please contact the Group Privacy Officer at [privacy@nutreco.com](mailto:privacy@nutreco.com). Although the gesture is well-meant and the project team members may like to receive the gift, just sharing the details could be problematic. The Group Privacy Officer can help you determine the best approach.

For further guidance please refer to:

[Nutranet > Policy House > E&C > Privacy Codes for Employee and Customer Data](#)



# Your commitment



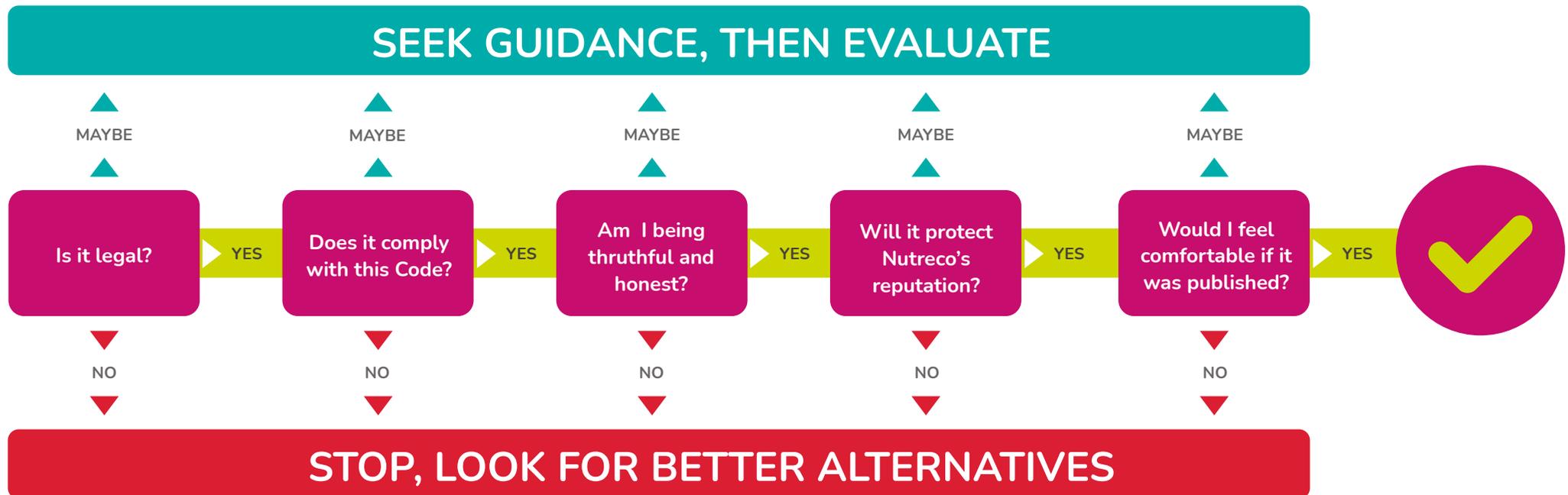
# If in doubt: ASK

While our Code and policies are well-defined, everyday life is not always as straightforward. You may face challenging situations in which the right thing to do is not immediately obvious. If you are unsure about what to do or what decision to make, ask yourself the following questions:

If the answer to any of these questions is “no,” do not proceed.

If the answer is “maybe,” seek guidance – here are a few ways you can do this:

1. Talk to your manager; he or she knows your business and your situation best.
2. Talk to a higher level manager.
3. Contact E&C or Legal.



# Raise your concerns and Speak Up!

**Our business is built on the trust we earn from our stakeholders. Any violations of our Code and policies erode this trust. Failing to follow the Code can put your colleagues and our business at stake. Because of this, it is important that you report suspected violations of our Code. There are several safe ways for you to do this.**

**“Good news may travel slowly, bad news should travel fast”**

In keeping with this principle embraced by SHV, you must report possible Code violations as soon as you become aware of them. This will help us to solve them before they have a negative effect on Nutreco. As a manager stimulate Speak Up: talk about it, listen carefully and act in a fair and reliable way.

## **Where can you raise your concerns?**

There are multiple ways:

- Talk to your manager or a higher level manager.
- Talk to HR.
- Talk to E&C or Legal.
- Send a message to [compliance@nutreco.com](mailto:compliance@nutreco.com)
- Leave a report with our whistleblower line Speak Up.

## **Speak Up**

- Speak Up is the central whistleblower program of SHV.
- Information on Speak Up can be found on special display boards in almost all of our locations.
- Speak Up can be reached online ([www.shvspeakup.com](http://www.shvspeakup.com)) or by telephone using the toll-free national number found on the display board in your location.
- Reports can be made by name or anonymously.

## **Investigation process**

- Reports will be investigated by one or more internal and independent investigators.
- The facts of the situation will be established by reviewing relevant documents and through interviews.
- We will respect the privacy and confidentiality of everyone involved in the process to the fullest extent possible.
- Employees under investigation will be notified and have the right to be heard as soon as possible during the process.
- The reporter (if known) will be provided with feedback on the outcome of the investigation.

## **Non-retaliation policy**

We will not tolerate any retaliation against anyone who, in good faith, reports a potential violation of our Code or internal policies. Any form of retaliation may result in disciplinary action, up to and including termination of employment.





### Corrective action

If we determine that there has been a breach of our Code or policies, corrective action against the involved employee(s) will be considered. This may range from sending the employee(s) a confirmation of our rules or a formal warning letter to terminating their employment and will depend upon:

- Whether the conduct was accidental or deliberate
- Whether the conduct involved a violation of the law
- Whether the conduct involved dishonesty, theft, fraud or personal gain
- Whether the conduct was repetitive or systemic
- Whether the employee cooperated fully or tried to conceal things
- The employee's level in the organisation
- Whether the employee self-reported or not.

### Q&A

I suspect – but am not certain – that someone is violating our Code. Should I keep my concerns to myself until I am sure?

> No. If you suspect a violation, raise your concerns. Reporting in good faith means that you can also share concerns you believe are true, but which may, after investigation, turn out to be unsubstantiated.





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