



Code of Conduct

Version 01/06/2019

Revision 1.1

Frießinger Mühle GmbH

Brühlstrasse 13

DE-74206 Bad Wimpfen

SCOPE OF APPLICATION AND CONTENT

This Code of Conduct applies to all locations and business units of the Friessinger Mühle GmbH. We commit ourselves to ensure that this code is respected, lived and acted by all our employees at all our locations, not only verbatim, but also in general use. The code provides the basis for labour relations with our employees. A very important part of responsible work in the food industry is - in addition to the compliance with laws, guidelines, principles and acknowledged standards - the protection of human rights and the health and safety of its employees (e.g. International Labour Organization, ILO) and also to take responsibility for our environment. Responsible and lawful action are understood as a natural course of action, that's why this Code of Conduct doesn't produce any new rules, rather it should explain the requirements on our behavior in the performance of our daily work. Therefore we have formulated a Code of Conduct in order to let, not only, our suppliers know what is expected from them. Rather our employees should get a clear understanding of the principles and ethical values, which do exist at the Friessinger Mühle GmbH. In our company we do everything possible to live with great social and environmental awareness, to improve constantly working conditions and to protect the environment.

COMPLIANCE WITH LAW

The Friessinger Mühle GmbH complies with the applicable laws and regulations of the countries in which we operate. This is what we demand of our suppliers, too. Further, every employee is committed to comply with regulations regarding health and safety protection at the workplace, environmental protection and product liability, which are described by sign boards and taught in trainings.

INTEGRITY AND ANTICORRUPTION

We act in accordance with generally accepted ethical values and principles, especially integrity, honesty, respect for human dignity, openness and non-discrimination for religion, belief, gender or ethnicity. The Friessinger Mühle GmbH rejects corruption, bribery and fraudulent business practices in any form and is committed to observe all operations regarding anti-bribery and anti-corruption laws and regulations.

HUMAN RIGHTS

Frießinger Mühle GmbH declares its responsibility with regard to the adherence to and promotion of human rights. Within the context of our business activities, we respect the internationally recognized standards for the protection of human rights. The working conditions of our employees are at least in accordance with fundamental labour standards and applicable laws. We do not select our suppliers exclusively on the basis of economic aspects. Environmental protection, work safety and social standards as well as legal compliance are also established as criteria in the selection of supplier relationships. We want to be an attractive employer, a reliable business partner and a good neighbour. For this reason, we assume social responsibility and support the activities of educational institutions and associations in the communities surrounding our sites. With our commitment, we want to contribute to positive social development and thus also to the encouragement of human rights. Open and respectful interactions with stakeholders are anchored in our fundamental values. Dialogue with relevant interest groups helps us to identify and evaluate new developments and challenges at an early stage and to address them in our business activities if necessary. As a company in the manufacturing industry, we are aware of the special responsibility we have towards our neighbours. If local residents have complaints about our conduct, they can express them using direct contact.

CHILD LABOUR

Child labour, but also labour of children of school age or younger than 15 years, is not accepted in the Friessinger Mühle GmbH (subject to special regulation of ILO-convention 138). The common starting age for work should coincide with the end of compulsory schooling. Any form of health, psyche or moral dangerous work is only allowed by the age of 18, under very strict conditions by the age of 16. In no case a child is permitted to work at night or in dangerous situation.

DISCRIMINATION AND HARASSMENT

The Friessinger Mühle treats all employees in all business decisions strictly according to their skills and qualifications, including employment and promotion, compensation, fringe benefits, conduct, training, dismissal and terminations and retirement rules. Nobody should be discriminated professionally because of its sex, race, color, religion, age or any disability, sexual orientation, political opinion, marital status, social origin or other personal characteristics. The employees of Friessinger Mühle GmbH are not exposed to any corporal punishment or otherwise physical, sexual, psychological or verbal harassment or abuse offenses. All employees must be treated with dignity and respect. We are also committed to workplaces that are free from any kind of harassment and bullying.

REGULAR EMPLOYMENT

There is a regular employment relationship between the individual employees and Frießinger Mühle GmbH. The work conducted is carried out on the basis of national regulations and the working relationship established in practice. The use of pure employment contracts, subcontracting or homeworking or through training plans without the intention of training skills is not used to avoid obligations towards employees arising from labour or social security law and regulations concerning regular employment. Nor are such obligations avoided by the excessive use of fixed-term contracts.

COMPENSATION

The compensation, including wages, overtime and fringe benefits succeeds at least or is higher to the specified amount in the applicable law. The Friessinger Mühle GmbH guarantees therefore, no pay wages below the legal minimum wage and grants in case of full employment a compensation that satisfies the basic need of the employee. The terms and conditions of employment contracts should be fully understood and freely agreed. Unlawful or unauthorized deductions from salaries are not allowed. The employees of Friessinger Mühle GmbH are regularly informed about the composition of their compensation. Deductions from wages as a disciplinary measure are not permitted. Deductions from wages that are not permitted by national legislation will not be made without the express written consent of the employee concerned.

WORKING TIME

Insofar there are no national regulations set, regarding less working time, the Friessinger Mühle does not require from the employees -on a regular basis- a standard working week of more than 48 hours per week or a total work week of more than 60 hours (including overtime, max. 12 hours per week). Overtime shall be done on a voluntary basis. After six successive working days our employees have the right to at least one day off or within 14 days the right to two successive days off. The Frießinger Mühle GmbH still ensures necessary breaks to guarantee the safety and health of its employees.

FORCED LABOUR

Any form of forced labour, any work or service that is done under the threat of punishment, or for its execution someone has to offer his work force voluntarily, does not exist in our company, either in form of prison labour, involuntary labour (e.g. slavery, serfdom), unpaid voluntary work, bonded labour or in any other forms. The Friessinger Mühle GmbH treats its employees with dignity and respect. Frießinger Mühle GmbH does not practice the retention of identity documents as a " deposit ". Every employee is free to leave the company after a reasonable period of time.

FREEDOM OF ASSEMBLY AND COLLECTIVE CONTRACT NEGOTIATIONS

The employer recognizes and respects the legal right of workers to freedom of assembly. The employees have the right to join organizations of their choice.

HEALTH AND SAFETY PROTECTION AT THE WORKPLACE

To avoid accidents and personal injuries, the Friessinger Mühle GmbH provides safe and healthy working conditions, as well as safe accommodations, which correspond to the minimum criteria of applicable legal requirements. At Friessinger Mühle GmbH there are clear rules and procedures for health and safety at the workplace, which have to be followed. Working methods and conditions that violate fundamental human rights are forbidden. So we make sure that there is no danger at the workplace and its surroundings (machines, pieces of equipment and work flow, chemical working substances, etc.) or to the physical integrity or health of the workers. For the prevention, employees also receive regular training on safety and health at work. First Aider, fire safety and hygiene manager and necessary protective equipment, potable water, appropriate social and toilet facilities are provided in the Friessinger Mühle GmbH. Regular site inspections control the order and cleanliness at the workplace, which each employee is responsible for. Accommodation provided to Frießinger Mühle GmbH employees is clean, safe and meets the basic needs of the employees.

QUALITY

Quality is the highest goal of the Frießinger Mühle GmbH. The stable quality of our products is one of the basics of our successful business. Quality means to us to come up to our customers' expectations as possible. Clarity, powerful and harmoniously integrated systems and a well-functioning communication is the basis of a good quality. A quality conscious acting also means for us to deal with valuable resources efficiently and carefully. Each employee has the obligation and the right to work towards getting circumstances eliminated, which prevent the production with excellent quality. The continuous improvement of the quality for us is therefore the medium and long term requirement for an effective reduction of costs and an important contribution to protect the environment.

ENVIRONMENT

The Frießinger Mühle GmbH uses environmentally friendly practices at all locations that we improve continuously. All relevant applicable environmental laws and regulations must be respected. Where applicable, procedures and standards for waste treatment, for the handling and disposal of chemical and other dangerous materials, emissions and waste water treatment correspond to at least the minimum legal requirements or exceed them. During the milling, our main process, there are no chemicals used, odors and industrial effluents do not occur in the process and emissions have been adequately reduced in the rural area to the inevitable. With the launch of an energy management system, the scope of the future energy policy of the Friessinger Mühle GmbH shall be directed and improved continuously. In principle, steps that have a negative effect on our environment shall be reduced and minimized. Environmental consciousness is our obligation that we also expect from our suppliers and business partners.

COMPLIANCE WITH THE CODE OF CONDUCT

The regulations of this Code of Conduct apply to the entire operation of the Friessinger Mühle GmbH, as well as to our suppliers and other persons who maintain a business relationship with us. A violation against the Code of Conduct can lead to disciplinary actions for all employees i.e. also for managers. Every employee is authorized and encouraged to report violations of this Code of Conduct. The Friessinger Mühle does not disadvantage an employee by informing the management or any responsible officer, if a violation against this code is suspected. We would like to know, if suppliers violate against one of these points. All information will be kept confidential.

Bad Wimpfen, 01/06/2019

Willi Frießinger jun. (Management)