

# CODE OF CONDUCT



VALUE BUILT ON VALUES

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# 1. Statement of Policy, Savola Foods Code of Conduct

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Savola Foods Code of Conduct designed to maintain a set of standards for the company's employees and all stakeholders . It highlights key policies that all employees should be familiar with. Each section of the code of conduct also provides employees with a clear understanding of what their responsibilities are.

All Employees are expected to be in full compliance with these codes at all times, and management should always guide all employees towards the proper observance of this Code of Conduct, as they constitute a major part of employee obligations towards Savola Foods.

All Employees and partners, (Consultants / Permanent / Temporary / Contractors) are expected to apply the principles of the Code of Conduct in all of their activities concerning Savola Foods and to ensure that their actions are in the overall best interests of the company, and to assist management in its efforts to ensure that the Code of Conduct is being followed.

In all decisions and actions taken on behalf of Savola Foods, Management is committed to the highest standards of integrity and ethical behavior, and to full compliance with all applicable laws in the countries we operate in, regulations and Savola Foods policies.

Employees shall not engage in any activities that may harm their personal reputation or that of Savola Foods, and shall behave at all times in conformity with the practices and traditions. Employees shall treat each other, their supervisors and colleagues with due respect and consideration, and shall not at any time engage in any behavior that may impinge, harm or malign the Savola Foods and its Management.

## 2. Message from the CEO

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Dear Brothers and Sisters,

In Savola Foods Company, we have a clear vision of success through building our business and our organization. Our ethics and values framework shapes our daily activities and relationships, where we focus equally on 'What' we do and 'How' we do it. We launched our 'Restoring Greatness' program not only to achieve our ambitious business goals, but also to revamp our culture and work environment so that SFC becomes the preferred employment destination for top talents across all our markets. Our aim is to share our pride of working in this great company with our families, our friends, and the communities in which we operate.

Our Code of Conduct is an essential element in our culture that was designed to protect Savola Foods' ethics and values. Those values are paramount to the success of our business as well as to shaping our company's character and image. If you suspect any unethical activities or misconduct within the company as a whole, please feel free to speak up and you have the right to remain anonymous by using the hotline tools at:

**<https://hotline.savola.com/en/Home.aspx>.**

We are a business run for people, and by people. That is why Savola's mission goes beyond only being a successful business and into having a positive impact on our employees and our society. We are well equipped for this role because of our unique people, our strong track record and, above all, our powerful heritage of ethical conduct. That's how Savola has earned its reputation for being a Value built on Values.

Regards,  
Sameh Hassan,  
CEO, Savola Foods Company

# 3. Company Heritage

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Savola Group is a strategic investment holding company focused on food and retail sector. Savola Group was established in 1979 with around 200 employees and a contributed capital of 40 million SR (11.6 million USD) at that time.

Savola Foods Company is Savola Group's flagship investment in the food sector operating in multiple categories and geographies that has around 7,000 employees and a capital of 2.2 billion SR (0.6 billion USD).

Savola Foods is a leading packaged foods company in the region of (MENATI) with consumer and customer focus.

Savola Foods strategic objectives include capitalizing on proven expertise in certain consumer-related business, while developing new categories that show potential to achieve brand leadership.

# A Journey of Value Creation



# 4. Savola Ethics and Values

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Savola Ethics and Values are the Foundation of its Code of Conduct. We always believe that the way we conduct our business and the core values that we hold are the most important pillars of our success. Thus, Savola was able to create a distinctive value because it is built on a solid foundation of values.

We strive to create financial value for investors, professional value for employees, and a social value for the communities in which we operate.

Savola Foods is witnessing continued growth and development over the years, crossing the borders of the country and touching the lives of millions across the MENATI region.

Our values are still pushing us forward in the booming times and protecting us in difficult times.

# Savola Values



## CORPORATE VALUES

Amanah

Taqwa

Birr

Mujahadah



## INDIVIDUAL VALUES

Tawado

Iq'tida

Azm

It'qan



## GROUP VALUES

Ihsan Al-Dhan

Qabool

Iq'bal

Mu'azarah



# 5. Business & Personal Ethics

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Savola Foods aspires to be a trusted and respected company in the foods industry. Every employee's reputation can positively or negatively affect the company's reputation for honesty, integrity, and fair dealing. Our Code of Conduct and Ethics expresses the core values of Savola; therefore, to protect and preserve the company's good reputation and continue to earn and deserve customers' trust, every employee must avoid situations that might cause an actual or perceived conflict of interest among the stakeholders including employees, customers, and vendors. Moreover, employees must avoid situations that might be seen as an actual or perceived conflict of interest between their personal gain and the welfare of the company and its shareholders.

Savola Foods Company expects its employees to demonstrate integrity and high ethical standards, to be conscientious, and to perform in such a way that we always have our customer's best interest at heart. As Savola Foods employees, we are responsible stewards of others' financial interests because our customers rely on us to maintain confidentiality and exercise prudence when dealing with their financial affairs, funds, and property. No employee may therefore take unfair advantage of another through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any other intentional unfair-dealing practice. In general, we should do what we say we will do and must communicate honestly and ethically in serving our customers and conducting business with others.

The core of the company's business Ethics is "Doing The Right Thing." In addition to complying with any applicable legal requirements and the requirements described elsewhere.

Everyone should ask the following questions in making decisions:

- Is my action the "right thing to do? And in line with Savola Foods Ethics and Values"
- Would I feel comfortable if my action were reported broadly in the news, or were reported to a person whose principles I respect?
- Is my action aligned with Savola Ethics and Values?
- Will my action protect the Company's reputation as an ethical company?
- Am I being truthful and honest?

If the answer to any of these questions about the action you are considering is not a definite "Yes" then simply, Do Not Take the Action.

# 6. General Compliance with Legal Requirements

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Savola Foods Company, and you as an employee, are subject to a wide variety of legal requirements as you conduct your work for the Company. We operate within the letter and spirit of the law.

We as employees have to obey to all applicable legal requirements at all times, and understand what legal requirements apply to our work by using appropriate resources, including appropriate company Legal personnel. As Savola Foods employees, we need to understand what legal requirements apply to our work by using appropriate resources, appropriate Legal personnel. If there are conflicting legal requirements in different jurisdictions, we need to consult with, and follow the direction of appropriate company Legal department to address and resolve issues once identified.

No one at any level of the Company has the authority to require or permit you to violate the law. If someone attempts to do so, do report the situation as described in the “How to Report a Business Conduct Case” topic in this manual.

# 7. Whistleblower Protection Policy

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We acknowledge that all organizations face the risk of their activities going out of business framework, policy and procedure from time to time, or of unknowingly embracing misconduct. We believe that we have a duty to respond appropriately to identify such situations and attempt to remedy them. By encouraging a culture of openness and accountability within the organization, we believe that we can help prevent such situations from occurring. We expect all employees to maintain high standards in accordance with our Code of Conduct and Company Ethics & Values and to report any wrongdoing that falls short of these fundamental principles. The aim of this policy is to ensure that our concerned persons are confident that they can raise any matters of genuine concern without fear of reprisals, in the knowledge that they will be taken seriously, that their concerns will be investigated appropriately and in a confidential manner. Please refer to the website <https://hotline.savola.com/en/Home.aspx> : for more information about the Whistleblower Protection Policy.

# 8. Accuracy of Company Books and Records

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## Books & Records:

Confidential information consists of non-public information which are not published yet including commercial issues of the company, marketing research information and sales information/plans, production information/plans, technical and engineering information, production formulas, products designs, employees' salaries or personal information, financial information, SOPs, company policy/procedures and any other information of this kind.

Continuous success of the company depends on properly using and protecting confidential information and non-disclosing them to third parties. Employees shall not disclose the confidential information or let others publish them unless they have documented permission of the authorized authorities in the company. This commitment will continue after resignation or end of service of the employee.

Furthermore, by special care in saving and transferring the confidential information, employees shall make all their attempts to prevent disclosure or informal publication of this information.

The company respects customers, suppliers and investors who have the same rights in keeping their information confidential. Information of other parties who are working with Savola Foods will be treated the same and shall be kept confidential.

The company is ready to compete successfully in the competitive market obeying the rules. Therefore, the employees shall adhere to the following regulations:

- Buying and selling policies and the prices will be defined independently and under any circumstances will not be shared with other competitors, organizations or persons directly or indirectly, formally or informally.
- Other information related to customers, products, competitive market will never be shared with competitors and the company will participate in the competition fairly.

This means in Savola Foods, there is no place for an intentionally false document or record. The company must have adequate assurance that the information in books and records, including its financial and other business records as well as personnel and benefit-related forms that employees may fill out, are accurate, timely and complete.

## Internal Controls:

Internal Controls are systems and processes that combine policies, authorizations and procedures with proper accounting and management tracking. This reporting is designed to ensure that business operations are properly managed. This means that the company have in place a set of internal controls that provides reasonable assurance.

# 9. Bribery and Improper Business Dealing

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## Anti-Money Laundering:

Savola Foods prohibits money laundering or financing for illegal or illegitimate purposes. “Money Laundering,” is the process by which persons or group try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.

You should always ensure that you are conducting business with reputable customers, for legitimate business purposes, with legitimate funds. If you suspect money-laundering activities, speak up and report it.

## Anti-Bribery and Corruption:

In the conduct of the Savola Food’s business, no bribe, kickback, or similar remuneration or consideration of any kind is to be given, offered, or received from any individual or organization. The activities of the Savola must always be in full compliance with all applicable laws and regulations. Savola Foods expects its employees to comply fully with the letter, spirit, and intent of all laws and regulations.

It is a Company Policy to comply fully with anti-bribery provisions of the law. A bribe may take the form of an offer, payment, promise to pay, or authorization of the payment of any money or anything of value.

Employees must never, directly or through intermediaries, offer or promise any personal or improper financial or other advantage in order to obtain or retain a business or other advantage from a third party, whether public or private. Nor must they accept any such advantage in return for any preferential treatment of a third party. Moreover, employees must refrain from any activity or behavior that could give rise to the appearance or suspicion of such conduct. Employees should be aware that the offering or giving of improper benefits in order to influence the decision of the recipient entail disciplinary actions up to and including termination of employment. Improper benefits may consist of anything of value for the recipient, including but not limited to Employment or consultancy contracts for closely related parties that are not in line with the relevant Savola Foods policies.

## Commercial Bribery:

The company does not engage in commercial bribery. Commercial bribery is giving to, or receiving from, company customers or suppliers (or their representatives), any personal payments, bribes or kickbacks with the expectation or effect of obtaining more favorable business terms or opportunities than would otherwise be available.

## Improper Payments to Government Officials:

The company prohibits improper payments to government officials. Improper payments are direct or indirect payments, whether in cash or in other things of value (such as lavish entertainment or gifts), to a government official or political party in order to influence acts or decisions, to receive special treatment or personal gain, or to obtain or retain business.

# 10. Our Work Standards and Guiding Principles

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## Employee Relations:

It is a company policy that all concerned persons, regardless of level, shall strive to meet the following objectives:

1. Respect each employee, worker and representative of customers, suppliers and contractors as an individual, showing courtesy and consideration and fostering personal dignity.
2. Make a commitment to demonstrate equal treatment of all employees, workers, customers, suppliers and contractors without regard to race, color, gender, religion, age, national origin, citizenship status or disability.
3. Provide a workplace free of harassment on the basis of race, color, gender, religion, age, national origin, status or disability.
4. Afford employees a reasonable opportunity, consistent with the needs of the business, for training to become better skilled in their jobs.
5. Encourage promotion from within, consistent with the needs of business, whenever qualified employees are available.
6. Ensure that each manager knows personally every employee two levels directly below them to allow employees an avenue to voice opinions to management other than their direct management.
7. Treat any suggestions by external consultants brought in to enhance our processes as opportunities to improve skills and not as criticism.
8. Provide and maintain a safe, healthy and orderly workplace.
9. Assure uniformly fair compensation and benefit practices that will attract, reward and retain quality employees.

## Sales Workforce:

It is a company policy that all concerned persons involved in the sales process, shall strive to meet the following guiding principles:

1. Offers shall be clear, so that consumers may know exactly what is being offered and the extent of the commitment they are considering.
2. A description of the goods and quality purchased, and the price in terms of payment shall be clearly stated on the order form together with any additional charges.
3. Contracts or receipts used shall conform to the applicable laws or regulations.
4. Any guarantee or warranty stated by the sales representative shall be consistent, with, and at least as protective as, that of the manufacturer or supplier of the product sold.
5. Any receipt or contract copy shall show the name of the sales representative and his/her representative and his/her address or the name, address and telephone number of the firm whose product is sold.
6. All salespersons shall immediately identify themselves to a prospective customer and shall truthfully indicate the purpose of their approach to the consumer, identifying the company or product brands represented.
7. Salespersons shall not create confusion in the mind of the customer, abuse the trust of the customer, nor exploit the lack of experience or knowledge of the customer.
8. A salesperson shall not imply that a prospective customer has been "specially selected" to receive some reputed benefit or that any offer is special or limited as to time when such is not the case.
9. All references to testimonials and endorsements shall be truthful, currently applicable and

- authorized by the person or organization giving it.
10. If product comparisons are made, they shall be fair and based on facts that have been substantiated.
  11. A salesperson shall refrain for disparagement of other products or firms.
  12. Strict compliance to the company credit policies, trade deals policies, zero deviation is allowed.

## **Purchasing Workforce:**

It is a company policy that all concerned persons involved in the purchasing and procurement process, shall strive to meet the following guiding principles:

1. To purchase without prejudice, seeking to obtain the maximum value for each amount of money spent; to conduct business in a highly ethical manner; to be honest, courteous, and professional in our business affairs.
2. To honor our obligations and require that obligations towards Savola be honored. Purchasing requirements shall routinely be subjected to competitive evaluation.
3. To accord vendor representatives with sufficient respect, remembering that these representatives are important sources of information and assistance in solving our purchasing needs.
4. To maintain confidentiality regarding quotations, price, or other confidential information involving Savola, suppliers, and competitor dealings.
5. To settle claims and disputes on the basis of facts and fairness.
6. To refuse to accept any form of commercial bribery, and prevent any appearance of so doing. No gifts of substantial value shall be offered to or accepted from suppliers or customers of Savola. In connection with a government contract or subcontract, no gifts of any value whatsoever shall be offered to or accepted from suppliers or customers. In the case of having to accept a token gift, it should be in accordance with the conditions set by Savola regarding gift policy.
7. To avoid conflicts of interest with the business of Savola.
8. To strive for greater knowledge of purchasing methods and of the materials purchased.
9. To be receptive to counsel from our colleagues, and to cooperate with them to promote a spirit of teamwork and unity.
10. To conduct one standard of fairness and dignity, and to demand honesty and truth in the purchasing process.
11. To cooperate with all organizations and individuals involved in activities designed to enhance the development of the purchasing profession, remembering that one's actions reflect on the purchasing profession.

# 11. Confidentiality & Privacy

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All Employees are required to safeguard and maintain Savola Foods' private information in the strictest of confidence and are not allowed to disclose any confidential, restricted, and/or classified Savola or customer information, or to discuss such information as privacy to his/her position, either while on the job or otherwise. Employees may not keep into themselves any means by which work related information and documentation is recorded, kept, and/or maintained, which should by necessity be kept confidential and/or classified, either by its nature or by virtue of confidentiality directives.

Savola Foods' records are confidential and may not be copied, transmitted or disclosed without authorization from management. Employees must never discuss customer affairs, accounts, files, or printed material, except on a need-to-know basis with other employees. Confidential information includes all personnel and payroll records, information about our customers, and anything else about the way Savola Foods operates.

Likewise, Savola Foods respects the right of employees to privacy in matters that are not related to their employment. Matters of a personal nature concerning fellow employees should be treated with the utmost confidentiality.

Financial information regarding the company must not be released to any person unless it has been published in reports to shareholders, or otherwise made available to the public in agreement with applicable disclosure regulations currently in effect. Any questions regarding disclosure of confidential financial information must be reviewed with and approved by the Chief Financial Officer prior to disclosure. Conversely, non-financial information requests must be cleared by authorized management in the Marketing and Public Relations sectors.

Confidential information obtained as a result of comments made on Savola Foods premises or while conducting regular business should not be used for private interests. All current and former employees are bound by this confidentiality policy. Anyone who violates this policy may be subject to disciplinary action as per country law up to and including termination of employment for existing employee.



# 12. Review, Amendments and Waiver of the Code of Conduct

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This Code of Conduct shall be periodically reviewed and assessed for effectiveness and adequacy. Any amendments to or waiver of this Code shall be made only by Savola Foods CEO. If an amendment to or waiver of this Code is made or granted, appropriate disclosure will be made as required.

# 13. Fair Dealing with Stakeholders

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## Treating Customers Appropriately:

Savola Foods treats its customers equitably and does not give any customer an unfair advantage over another competing customer. The company does not discriminate by customer size, type, channel, or business strategy.

Examples of some situations that raise concerns:

- An employee applies pressure to secure a customer's agreement to resell a company product only at a specified resale price or within a specified price range.
- An employee terminates sales to a customer because other customers have complained about its resale pricing.
- An employee provides marketing incentives to a customer, but not to a similarly situated competitor of that customer.

## Treating Suppliers Appropriately:

Savola Foods allows suppliers to compete equitably for the company's business based on the total value offered to the company by that supplier.

Examples of some situations that raise concerns:

- A supplier solicits an employee to consider the supplier for business and, because the employee knows the individuals representing that supplier socially, he/she decides to purchase from that supplier.
- An employee creates criteria for a supplier that can be met only by a particular supplier who has offered him/her sports tickets, expensive dinners, or unique gift.
- An employee expects suppliers to regularly contribute to a local charitable campaign in which he/she is heavily involved.
- An employee asks a supplier to match the price the company is currently paying to another company for a good/service, and then shares confidential details of the current arrangement with the potential supplier.

## Advertising and Promoting to Consumers Appropriately:

Savola Foods does not permit its advertising or promotions for its products to be false or misleading.

Examples of some situations that raise concerns:

- Exaggerated or unsupported advertising claims are made to compete with a competitor that is doing the same business.
- Incomplete, inadequate or misleading disclosures in company advertising lead consumers to infer an incorrect unsupported conclusion.
- Advertising is distributed to the public before testing supporting the claims made in the advertising has been completed.

Following are general guiding principles to ensure efficient and fair operation of advertising activities:

- **Truth:** Advertising should tell the truth, and should reveal significant facts, the omission of which would mislead the public.
- **Substantiation:** Advertising claims shall be substantiated by evidence in possession of the advertiser and advertising agency, prior to making such claims.
- **Comparisons:** Advertising shall refrain from making false, misleading, or unsubstantiated statements or claims about a competitor or his products or services.
- **Bait Advertising:** Advertising shall not offer products or services for sale unless such offer constitutes a bona fide effort to sell the advertised products or services and is not a device to switch consumers to other goods or services, usually higher priced.
- **Guarantees and Warranties:** Advertising of guarantees and warranties shall be explicit, with sufficient information to apprise consumers of their principal terms and limitations or, when space or time restrictions preclude such disclosures, the advertisement should clearly reveal where the full text of the guarantee or warranty can be examined before purchase.
- **Price Claims:** Advertising shall avoid price claims that are false or misleading, or savings claims, which do not offer provable savings.
- **Testimonials:** Advertising containing testimonials shall be limited to those of competent witnesses who are reflecting a real and honest opinion or experience.
- **Taste and Decency:** Advertising shall be free of statements, illustrations or implications that are offensive to good taste or public decency. In particular it shall be compatible with prevailing religious values of the society where we operate.

## Treating Competitors Appropriately:

Savola Foods goal is to win consumers for its products by virtue of the products' quality and value, and not by creating unfair disadvantage for its competitors.

Examples of some situations that raise concerns:

- An employee making a category management presentation to a customer recommends a new shelf space allocation and/or product distribution that is unsupported by reasonable marketplace data.
- An employee damages a competitor's products or advertising materials in a customer's store, or removes or obscures such products.
- An employee pressures a customer to disclose non-public information about competitor plans.

## Fair Competition:

The company does not make any agreements or arrangements with competitors with the intention of diminishing vigorous and fair competition between them. The company unilaterally and independently determines the prices and terms of sale for company products and services.

Examples of situations that raise concerns:

- An employee engaged in category management meets with a competitor to develop a joint recommendation to the customer.
- An employee implicitly agrees with a competitor that the competitor will follow the company's price changes and/or vice versa.
- An employee shares information with a competitor, either directly or through a trade association that will "signal" the competitor about how much promotional activity both companies should engage in during the next quarter.

## Suppliers Selection:

A supplier's performance and adherence to high business standards and ethical practices is an important and integral part for Savola Foods business practices that promote and expect the application of high legal, ethical, environmental and employee-related standards within our own business and among our suppliers.

Savola Foods commitment to integrity and professionalism is set forth in our Code of Conduct, which provides a clear set of standards for all our business conduct practices.

We believe that deviations from or violations of the Code of Conduct are unacceptable, and that our employees, clients or suppliers should feel able to raise them without any fear of retaliation or discrimination. To that end, we provide Savola Hotline to deal with sensitive ethical issues.

Savola Foods Code of Conduct sets forth the minimum standards of business conduct we expect from all of our suppliers.

## **Compliance with Laws:**

Suppliers shall comply fully with all laws and regulations applicable to them.

## **Environment:**

Savola Foods expects its suppliers to demonstrate a clear understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide. Suppliers should have in place an effective environmental policy, statement or program to mitigate these risks, the implementation of which should be evident throughout all levels of the company.

## **Human Rights:**

Suppliers must ensure that they and/or their subcontractors and suppliers shall respect the rights of their employees and comply with all relevant legislation, regulations and directives in the countries in which they operate.

## **Diversity and Inclusion:**

Our sourcing decisions, contracts and management of supplier relationships will reflect and promote the principles of Diversity and Inclusion by incorporating equal opportunities to all. In that, they will seek to ensure that suppliers do not victimize, harass or discriminate against any employee or party to the contract due to their gender, race, ethnicity or national origin, disability, religion or age. Suppliers will be required to meet the requirements of any applicable discrimination legislation. Our suppliers will be treated fairly and equally during the tendering and purchasing process, with decisions made on the basis of clear selection criteria.

## **Health and Safety:**

Suppliers must ensure that they and/or their suppliers abide by all local laws, directives and regulations relating to health and safety in the workplace or in any other location other than the workplace where production or work is undertaken and that they implement any amendments to these laws, directives or regulations.

## **Ethics:**

The highest standard of integrity is expected in all our business dealings. Any and all forms of corruption, extortion, bribery and fraud are strictly prohibited and may result in immediate termination and legal action.

# 14. Our Commitment to Safety, Health and Environment

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## Health and Safety:

Health, Security and Safety objectives are number one priority in Savola Foods to be considered all the time and to minimize accidents, and not to harm persons and working environment. It is important for us to provide safety and security of the company's employees and all workers. To achieve such goals, responsible, smart and respectful behaviors are required.

In case of any unsafe situation that may endanger health and security of other personnel, all employees are obliged to report the case to the relevant management personnel and contribute to avoid danger. In other words, any kind of accident, incident, illness and unsafe situation shall be immediately reported. All employees shall know the safety instructions and HS&E concerns of their jobs and observe its requirements.

## Product Safety:

- The company's products and packages will be safe for consumers and the environment when used as intended.
- The company will seek to ensure that our operations are safe for our employees, neighbors and the environment.
- The company will meet or exceed all applicable legislative and regulatory requirements with respect to product safety and labeling.
- The company will provide interested parties with relevant and appropriate factual information about the safety of our products and packaging.

## Employee Safety:

Savola Foods strives to provide a safe and healthy working environment for its employees. Nothing, including urgent business needs, justifies circumventing company safety practices.

## Environmental Quality:

- The company will meet or exceed all applicable environmental legal requirements.
- The company will assess our environmental performance with a focus on continuous improvement.
- The company will provide interested parties with appropriate factual information about the environmental aspects of Company operations and products.

## Adherence to Regulations, Instructions and SOPs:

- All employees under any circumstances shall observe company's internal regulations notified to them through procedures, instructions and SOPs.
- All Savola Foods employees regardless of their grade or level shall obey the company's policies and regulations.
- Any behavior or action in contrast to the country's laws, company policy and procedures will be treated as per the country approved disciplinary actions policy and in line with the relevant labor laws.

# 15. How to report a Business Misconduct Case

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All concerned persons shall promote ethical behavior and shall encourage employees to talk to supervisors, managers or other appropriate management personnel when in doubt about the best course of action in a particular situation. The concerned persons shall report illegal or unethical behavior, of which they become aware. As such, all executive management, managers and employees shall report illegal or unethical behavior to their direct line supervisor (manager) or to the Integrity Hotline.

Violations will be investigated and action will be taken by the appropriate personnel. Savola Foods will not allow retaliation for reports made in good faith and for more details, in this regard reference can be made to the whistleblowing policy.

## How to Report a Business Misconduct Case, Savola Integrity Hotline:

Savola Foods calls for each of you to protect Savola Values. Integrity is one of those values and is paramount to the success of our business. If you suspect any unethical activities or misconduct within the company as a whole, blow the whistle using the Integrity Hotline. You have the right to remain anonymous.

Savola Integrity Hotline is a confidential reporting framework covering the entire operations in the region, managed at a Group level, which allows all employees and any concerned person to anonymously report incidents, and instances, which include suspected illegal activities, theft, fraud, corruption, waste or misconduct.

The program allows you to report violations online at: <https://hotline.savola.com/en/Home.aspx>. Click on the Integrity Hotline tab and follow the simple instructions. This reporting channel is completely independent and secure. Independent professionals with experience in investigating such matters will analyze the reported cases.

Please be assured that employees and concerned persons using the Integrity Hotline for genuine concerns can do so without fear of retribution and will not be victimized or intimidated in any way. You have our assurance.

Anonymity of a reporting person and a professionally managed framework are hallmarks of this service and Savola management is passionately committed to this initiative.

We believe that the service will open a communication channel for discerning and honest individuals, like you, who need to communicate any matter of concern.

Together, we will work to make Savola Foods an Employer of Choice.

# 16. Dress Code

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All employees are required to maintain a consistent professional appearance in and out of the Savola environment while performing their duties.

Savola Foods employees of both genders must adhere to the dress code of the company.

## Males & Females:

All employees, regardless of gender or nationality, should always observe the below guidelines and the dictates of a decent and appropriate dress code. The company's expectations are as follows:

1. Hair – clean, well groomed.
2. Hygiene – a high level of hygiene is required at all times and considered a must.
3. Sleeveless shirts/T-Shirts may not be worn on duty.
4. No excessively tight and revealing clothing are allowed while on duty.
5. The official company ID/access badge must be worn/carried at all times during the working hours.
6. This policy must be adhered to within the company offices and/or during the course of field assignments while representing the company.
7. Company allows smart business casual dress.
8. Employees may generally wear clothes relevant to their professional status.
9. Business shoes must be clean and in good condition; low-heel duty shoes, or training shoes with no brightly colored markings, clean and in good condition, appropriate for the work requirements. Clean socks, with laces tied at all times.

## Female Employees:

Without compromising on local customs and traditions and possible relevant laws, the female employees should always consider the following guidelines:

1. Standard uniform includes formal, smart clothes, including long skirts, blouses with long sleeves and formal pants and suits.
2. Make-up should not be visible.
3. Using perfumes should not be noticeable.
4. No low cut necklines.
5. Jewelry should be kept to a discrete minimum.
6. If required to wear uniforms, maternity uniforms are self-provided.
7. Plain closed/open toe, quiet suitably heeled shoes or sandals, clean and of professional standard.



## Uniforms:

Wherever the work requires, the company will provide certain employees with uniforms for use during working hours. This covers temporary employees, summer interns and coop. This is done for reasons of safety, uniformity of appearance and protection of the employee's personal clothing.

1. At the beginning of his/her service, each eligible employee should receive from the company minimum one pair of safety shoes, two complete sets of uniform which he/she will be required to wash and keep in good shape throughout their service.
2. Replacement of these uniforms following the original issued will be made when the employee's manager considers that such replacement is necessary. In all cases, the Department Manager should ensure that the need for this replacement was the result of a normal use, and not willful damage or negligence. The employee's manager should take adequate measures to avoid recurrence.
3. Employees who willfully or through negligence lose or damage their uniforms will be provided with replacement uniforms by the company at their own expense.
4. Uniforms are the only clothes allowed at work for staff that their work area located within operations area premises. It is expected that they keep them in good condition and utilize them properly.

## Dress Code Violations:

The line Managers are expected to inform employees when they are violating the dress code. The violators are expected to immediately correct the issue. Repeated violations or non-cooperation from the violators should be reported to the HR for disciplinary action .

# 17. Business Entertainment

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The company recognizes that business entertainment is essential to the operations of the company since it opens up channels of communication between the management and employees on one hand and among all employees on the other hand.

All types of business entertainment activities should be placed in proper frame to ensure careful control of relevant expenditures and better optimization of the company events and should be in line with the relevant company policies.

## Purpose of Business Entertainment:

The dinner/lunch gatherings should be for an occasion that has business significance for the company and really means something for the team. They are also intended to contribute to the development of team spirit/motivation. The organizing manager's speech should take this into consideration. All Business Entertainment should be budgeted and approved.

## Types of Business Entertainment Expenses:

The approvals of events' related expenses should be obtained prior to authorization for payment. The expenses that are normally covered by business entertainment include:

- **Air Tickets:** When attendance of employees out of country/city is beneficial and necessary to the business purpose of the event.
- **Meals and Refreshments:** Foods and beverages provided during the event are treated in the same way during business trips.
- **Event Venues:** This depends on size and purpose of event as well as number of attendees. Company facilities are given priority whenever possible.
- **Professional Events Management Agencies:** For major company occasions like Company Annual Conference when the company requires enhancement and enforcement of a business message or a theme for the event.
- **Professional Speakers:** Professional speakers may be invited to deliver a lecture or a speech of relevance to the business.
- **Organizational Surveys:** Based on management approval, a professional agency may be assigned to conduct employees' organizational surveys during the event that is usually major annual event.
- **Accessories:** Extra reasonable accessories for the set-up of location when necessary to enhance the purpose of the event.
- **Small Gifts:** To honor employees/teams/guests that contributed to the success of the company and showed distinguished performance, which should be in line with the company Rewards and Recognition policy guidelines.

For more details and information about the Business Entertainment Policy, please refer to the Savola Foods Corporate Policy and/or the Local Country Policy.

# 18. Diversity & Inclusion

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All employees shall show respect for differences, talents and abilities of one another.

Diversity here means all individual specifications that make us different from others such as personality, lifestyle, experience, working background, color, religion, race, ethnicity, gender, marital status, physical condition, etc. To be successful we need to attract, develop and keep workforce with different abilities and aptitudes. All employees play an important role in creating a healthy atmosphere at work to realize company's objective. All employees shall contribute and feel worthy and respectful at work. Everybody can contribute through following ways:

- Respect each other's abilities, skills, experience and talents.
- Employees are equipped with individual abilities, skills and talents. We should respect these differences.
- Develop honesty and trustworthiness in the company.
- The individual differences among employees can cause innovation and progress. So all employees shall accept such differences.

## Fair Dealing:

All Employees must always act fairly and honestly; no-one should take unfair advantage of others through:

- Manipulation
- Concealment
- Abuse of confidential information
- Misrepresentation
- Any other unfair dealing practice

Employees should always act with due skill, care and diligence, and should always act in the best interests of company and its shareholders while embracing Savola Ethics and Values. Moreover, employees should always act according to the standards established by regulations, and must always comply with all relevant regulatory requirements.

## Non-Discrimination:

All employees shall be given equal opportunity to apply their abilities and potentials to contribute to Savola Foods success. To do so, all job applicants and employees shall be treated equally during job interview, employment, promotion, performance appraisal, training and other processes and decisions. Formal criteria declared by the company shall be met to decide about employees and job applicant's factors of competency, ability and performance and not any other irrelevant factors such as:

- Race or ethnicity
- Gender (excluding cases where nature of work requires physical fitness)
- Age
- Religion
- Disability
- Any cases clearly mentioned in the labor law

Decisions based on any of these personal criteria are unprofessional and fair treatment is in priority in any situation if the competent employees have the opportunity to promote and develop their abilities and contribute to company's objectives.

# 19. Conflicts of Interests

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The company policy regarding possible conflict of interests is based on the principle that an employee's business decisions must be made in the best interests of the company. In reaching these decisions, an employee should not be influenced by personal or family considerations, which might consciously or unconsciously affect his/her judgment as to what is in the best interest of the company.

There is a possible conflict of interest if an employee has any personal or family interest, financial or otherwise, in any other organization, which might profit:

From decisions made by him/her in execution of his/her company responsibilities:

Or,

From his/her knowledge of the company's actions or plans.

Possible "Personal Business" should not be handled by employee in such a way that may be perceived by others as an implication of company support by whatever position the employee is taking. "Personal Business" refers to those activities, which are essentially of interest to the employee, not to the company.

## Legal Applications:

Without compromising on local labor and relevant laws, company will ensure full protection to company's interests that may include maximum disciplinary action allowed by these laws.

- This policy must be shared and explained to the employees by their supervisors/managers on regular basis (annual review is preferred). On such occasions, employees should disclose any conflict of interests that might affect the business.
- If there is a possible conflict of interests, the employee should report it to his/her immediate supervisor/manager who should refer the matter to the HRBP and respective BLT member / Head of function to take the needed action as appropriate.
- This policy should be reviewed with new employees (by HC Division) at joining up orientation to ensure full understanding of the company policy regarding possible Conflict of Interest by them.

## Conflict of Interests - Basic Principle:

The basic principle of this policy is that: **No employee, because of his/her own or family interests, should be in a position in which that his/her decisions may be influenced by anything other than the best interests of the company, nor should such decisions even appear to be subject to any conflicting influence or interests.**

- a. Each employee has an ongoing responsibility to voluntarily disclose any potential conflict of interest so that the company can follow its established procedures to make a determination as to whether or not an actual conflict exists and whether it is material.
- b. Potential conflicts should be promptly reported whenever they arise. Employees should not wait until an annual compliance questionnaire is distributed.
- c. Proper disclosure will protect the employee and the review by higher management will either neutralize the conflict or call for some other means of resolving it.
- d. Employees must disclose to their line managers and to the head of Human Capital Division in their business any conflicts of interest. Disclosure must take place as soon as the employee identifies that may be a conflict of interest and, whenever possible, before the employee engages in the conduct in question. Newly hired employee specifically must disclose all conflicts of interest during the hiring process so they can be discussed with the hiring manager.

## Investment:

As a general rule, no employee or his/her immediate family should have any ownership or profit interest in a competing firm, or in any firm of supplier or customer with whom he/she deals in his/her employment. A nominal or portfolio investment in a listed firm or a small indirect ownership via investment fund would normally not represent a conflict of interest provided it would not affect the employee's efforts on behalf of the company.

For example:

- An employee who is involved in or closely related to the purchase of any commodity for the company should not personally trade in that commodity.
- An employee or family investment in a supplier may also pose a conflict if the employee, though not involved in company's dealings with that firm, can nevertheless influence the firm's actions.

## External Employment or Personal Business Activity:

Employees must not have any kind of paid or unpaid engagement with Savola Foods business partner or competitor. Employees are expected to give their full-time best efforts to the company. No employee should have any outside business interest which diverts a significant amount of his/her time or attention from his/her duties and responsibilities to the company, or which otherwise acts to the disadvantage of the company.

## Employment of Relatives:

Company may allow the recruitment of qualified relatives of an employee if they are qualified for the position, and considered on merit among all other candidates. Conflict of Interest may arise when an employee is involved in his/her relative candidate's selection at the time of recruitment. It also may arise when an employee – after recruitment or at any point of time during his/her career – is allocated within the same department where his/her relative employee is working as Head of Department (BLT), MOR or Line Manager/Supervisor. This should be avoided by early disclosure to the company from both sides and by HC Division acting accordingly in line with guidelines of this policy. It is important to adhere to the following:

- Relatives are: Father, Mother, Son, Daughter, Brother, Sister, Uncle, Aunt, Grandfather, Grandmother, Grandchildren, Husband or Wife, Son, Daughter of direct aunt or uncle, Nephew, Niece, Brother-in-law, Sister-in-law, Mother-in-law, Father-in-law, Son-in-law, Daughter-in-law and Cousin.

## Entertainment/Gifts:

Entertainment and gifts from customers, suppliers and any other external parties (in the form of cash or cash equivalents e.g. stocks, gift certificates, discounts, commission, service, or other favor) should never be accepted by the employees where any obligation could be expected by either parties. If lunch or dinner meetings are deemed desirable for business reasons, company representatives should, on appropriate occasions, offer to bear the expense. Regular promotional items distributed in mass to employees, i.e. new year calendars, pens (reasonably priced - not to exceed value of 50 SAR) and desk tools do not fall under this policy. In case the employees have received any mailed gifts, employee should handover the gift to the Head of HC Division to take the right action.

## Business Activities of Relatives or Closely Related Persons:

If an employee has a relative/ closely related person who is an employee and/or owner of customer, supplier or competitor, it is inappropriate for the employee to participate in decisions with respect to company's business relationship with that firm. It is also inappropriate for the employee to discuss any confidential company activity with such persons or expose them to any confidential company documents or materials. These explanatory guidelines highlight the principle areas in which company personnel are likely to encounter a conflict of interest. If an employee discloses or is discovered to have a conflict or potential conflict, it should be handled in accordance with this policy statement and its procedures in effect for disclosure and review.

"Closely related persons" are the employee family members, or friends with whom the employee has an intimate relationship.

## Outline of Procedures:

### Role of Line Manager:

- a. Annually, preferably in January, instructions will be issued requiring every supervisor/manager to communicate the company's conflict of Interest Policy to employees reporting to him/her. As part of such circulation, supervisors/managers should be required to advise as to the existence of any possible conflict (whether new or previously reported). The subject should also be reviewed with administrative, technical, and other employees who are in decision-making position with potential for conflict of interest situations.
- b. Any possible conflict of interest reported to a supervisor/manager as a result of this annual review should in turn be reported to the HRBP and OU GM. In order to save time and ensure consistent handling, a standard conflict of interest disclosure Form will be used to report possible conflicts of interest.
- c. After the case is reviewed by Human Capital Division and Legal Department and feedback/corrective action is presented, the employee will be notified of the company's position and a copy of the report placed in his/her personal file. The supervisor/manager will be responsible for ensuring that the appropriate corrective action, if any, is implemented.

## **Role of Legal Department:**

Legal Affairs Manager/Department will review each reported possible conflict of interest case and the action recommended by the supervisor/manager. Legal's position will be noted on the Disclosure Form or other report and a copy returned to the supervisor/manager via the Business Leadership Team member. Notifying the employee about Company's position is the role of employee's supervisor/manager.

## **Role of OU GM:**

The annual compliance letter and questionnaire shall include a reference to the company's Conflict of Interest Policy. Each OU GM will be required to confirm that:

1. The company's Conflict of Interest Policy was communicated to the appropriate employees following the annual reminder distribution.
2. Possible personal conflicts of interest were reported to Company's Legal Department for legal concurrence or recommendation.
3. Personal file includes appropriate documentation concerning the disposition of any conflicts reported because of the annual conflict of interest review.

## **Role of Internal Audit:**

On a sample basis, the Internal Audit will ensure that these procedures are being followed throughout the company.

### **A.Documentation of Reports:**

All reports of possible conflicts of interest and relevant documents will be noted in the employee's personal file.

### **B.Company Management of Disclosed Conflicts:**

It is important to recognize that although a conflict of interest situation may develop from a conscious act on the part of an employee, it may or may not be caused by the employee at all. Further, proper management actions will control or clarify all conflict situations if the employee's motives are honorable. These same proper management actions will help identify and deal with improper motives in the rare cases where they exist.

### **C.Documentation of Company Position:**

Any action or position of the company with respect to a conflict should be communicated to the employee in writing by the member of BLT, under which employee's department is, with copy to the HC Division and Legal Department. This letter should summarize the facts, which led to a decision, state the conclusions, and state the actions, which are requested of the employee. Written statements of disassociation from certain decisions should also be sent to the Legal Department.

## **Responsibilities and Implementation:**

It is the responsibility of every employee to adhere to this policy within his or her area of functional responsibility, to lead by example, and to provide guidance to those employee reporting to him or her. All employees are responsible for adhering to the principles and rules set out in this policy.

For more information, please refer to the Conflict of Interests Policy.

# 20. External / Media Communication

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To exercise careful control over all public statements by employees on subjects related to the company's activities or interests, all types of information disclosure and communications related to the company and its sectors with all media (Radio, TVs, Newspapers, Magazines, News Agencies and Internet Forums) are entirely restricted unless authorized in writing by Savola Foods CEO.

Any press release or media article and interview materials should be channeled through Savola Foods CHCO and Savola Foods CEO approval.

For more information, please refer to the Communications Policy (External/Internal).



# 21. Intellectual Property, Security, Information, Clean desk, Violence & Smoking Policy

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## Intellectual Property:

Systems, software, manuals and any other intellectual property developed for Savola Foods (both those developed by the employee him/her self while on the job, or by external third parties) are and remain the property of Savola. An employee is not expected to retain such material or transfer it outside Savola even after he/she has left the company.

Similarly, Savola Foods shall not use proprietary material developed by other companies or individuals that is not in the public domain without prior permission from the rightful owner of those properties.

## Security of Company Premises and Facilities:

The purpose of premises/site security is to ensure protection of physical assets including buildings, fittings, equipment as well as people working on the site by preventing potential intruders from having access to the site and detecting those who have gained unauthorized access.

## Clean-Desk Policy:

To ensure the confidentiality of the company information and security of its property, clean desk guidelines should be communicated to all employees and implemented especially in open space work environment. Employees' are fully responsible for adherence to the following guidelines:

- a. Paperwork should be kept as much out of sight as possible.
- b. If desks are lockable, paperwork should be locked away at the end of each day and over the weekend.
- c. All personal valuable items should be locked away when desk is not attended.
- d. Laptops, meeting rooms' equipment and other company valuable items should be locked away at the end of each day and over the weekend.

## Violence:

Company is committed to providing employees with an environment that is safe, secure, and free from threats, intimidation, and violence. Violation of this policy by any individual will lead to disciplinary action up to the maximum allowed by relevant local laws and including termination.

### General Guidelines:

- a. Workplace violence includes:
  - **Threatening behavior:** such as shaking fists, destroying property or throwing objects.
  - **Verbal abuse:** swearing, insults or humiliating language.
  - **Physical attacks:** hitting, shoving, pushing or kicking.
- b. Employees must directly report such incidents to their Line Manager and/or Human Capital Division.
- c. The scope of these policies applies to all employees, casual labors and visitors to the company and applies to any and all acts of violence, intimidation and inappropriate aggression.
- d. In all situations and without compromising guidelines of this policy, if violence appears to be imminent and about to happen, employees should take the precautions necessary to assure their own safety and the safety of others.
- e. Human Capital Division should treat incidents of workplace threats or acts of violence seriously. Witnesses should report such acts or threats promptly to HC Division. Reported threats or acts of violence should be investigated promptly, and appropriate action should be taken to address each incident that is reported.
- f. Company should investigate all complaints in a sensitive and confidential manner to protect the rights of the victim and the accused. All investigations and sensitive information will be treated confidentially and should be documented properly.

## Smoking and Alcohol:

Savola Foods has adopted a non-smoking policy for all of its Operating Unit, offices, and facilities. Smoking is permitted only in designated areas, or outside business edifices, and smokers should pay particular attention and give due consideration to the rights of non-smoking employees to work and breathe in smoke free environments.

Savola Foods is committed to providing a healthy environment for all employees and guests. Hence, we ask all employees to follow all rules and act with respect and responsibility to each other. Savola Foods code of conduct does not permit smoking in offices. Smoking is permitted only outside the building or wherever a designated smoking area has been provided for that purpose.

Savola Foods does not allow usage of Alcohol by its employees during working hour in the workplace or in any business related events or meetings at any time and will not cover any expenses related to that.

# 22. Political Contributions and Related Policies

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## Political Contributions:

It is Savola Foods policy on Political Contributions that the company funds or resources may not be used to make a political contribution to any political candidate or political party anywhere in the world, except where such contributions are permitted by law and express permission has been given in advance by the Company Chief Executives Officer.

## Employee Political Activities:

Savola Foods does not discourage its employees to participate, as individuals and on their own time, in such political undertakings, as they may desire. A decision by an employee to contribute any personal time, money or other resources to a political campaign or political activity must be voluntary.

Savola Foods policy does not permit the use of any of company facilities, including conference facilities, office supplies, mail service, telephones, fax machines, word processors and copying machines for political campaigning, political fund raising or partisan political purposes. Employees may not participate off-site in assisting any political candidate's campaign during paid working hours and may not do so on the company premises at any time. Should an employee decide to make a contribution of time or money, reimbursement or compensation from Savola Foods or its affiliates is specifically forbidden. Referenda and Public Issues as a corporate citizen, Savola Foods may from time to time take a stand on issues of public policy, particularly those that affect the interests of the company, its employees, stockholders, customers and suppliers.

These occasions may arise through legislative, administrative or regulatory activities of various levels of government, or through the initiative and referendum process, constitutional amendments or other procedures involving a vote of the people.

In such cases, Savola Foods, after appropriate clearances, may express their views publicly. Savola Foods funds may also be spent in any lawful manner to ensure that company's' position is broadly disseminated and to provide financial support to the organizations that advocate essentially the same position the company has taken.

# 23. Transacting International Business

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Managers and employees of Savola Foods affiliates doing business around the world are required to conduct their activities in compliance with the applicable laws of these countries. They are also required to comply with all Savola Foods policy statements.

In addition, managers and employees whose units or companies are engaged in international activities need to be aware of, and comply with, certain local laws that apply to such activities of the company and, in some instances, its non-Saudi affiliates.

## **Payments to Foreign Government Officials:**

Employees involved in international operations should be especially mindful of the Foreign Corrupt Practices that makes it a crime to make payments, whether directly or indirectly, to a government official or political party in order to obtain or retain business. The law prohibits not only payments of money, but also the providing of other things of value for an improper purpose--for example, lavish entertainment or transportation. Small gifts or tips to low-level government clerical or administrative personnel, such as customs agents, intended only to expedite performance of routine actions, are exempted from this law and permitted by Savola's Foods policy if legal under local law. Individual employees violating the law may be subject to criminal prosecution, so prior advice of Savola Foods legal affairs department is essential regarding any matter that might possibly raise a question in this area.

## **Compliance with Export Control Laws**

It is Savola Foods policy to comply with all local and foreign Export Control laws. These laws restrict exporting certain commodities, software and technology to various countries. Controls under these laws, for example, restrict sales to certain countries of technologies, materials and products that could be used in weapons. There are also controls that impose trade sanctions and prohibit sales to certain named individuals and companies.

Savola Foods operations worldwide must comply with applicable Export Control laws of all countries where they conduct business. Many countries have export control laws. If local Export Control law conflicts with the export control law of another country, consult Savola legal affairs department attorney before taking action.

## **Compliance with Customs Laws and Regulations:**

It is Savola Foods policy to comply with all customs laws and regulations in all business operations. International movement of Savola Foods products requires appropriate customs documentation, country of origin markings and proper valuation declarations. Assistance in these areas can be obtained from Savola foods legal affairs department.

## **Payment for Goods or Services:**

Payments for goods and services provided to Savola must be paid by cheque, draft or other approved documentary transfer payable to the person or company legally entitled to receive payment. Written contracts must be used to purchase goods and services except where purchases are routine in nature and arise out of Savola's ordinary course of business.

# 24. Harassment

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The company intends to provide a professional work environment that is pleasant and free from intimidation, hostility or other offences that might interfere with work so employees at all levels can devote their full attention and best efforts to the job.

Harassment of any kind - verbal, physical, and visual - will not be tolerated and will be seriously dealt with on a case-by-case basis. Harassment by any individual will lead to disciplinary action up to the maximum allowed by local relevant laws and including termination.

Harassment has no place in the work environment. The company does not authorize and will not tolerate any form of harassment based on the following: Race, ethnicity, gender, nationality, age, physical appearance, marital status, disability or religion.

This policy applies to management and non-management employees alike, and even to non-employees who harass our employees.

This policy protect employees from harassment by other employees, as well as harassment by customers or vendors of the company, or any other person or entity who is in a business relationship with the company. It also prohibits employees from harassing other employees, as well as customers, vendors, or any other persons or entities who are in business relationship with the company.

Harassment is defined as: any behavior that disgraces, embarrasses, humiliates, annoys, alarms or verbally abuses a person in a way that is known or is expected to be unwelcome. This includes written or verbal words, suggestions, gestures, intimidation, bullying, or other inappropriate activities.

## Examples of Harassment at Work:

It is impossible to list every type of behavior that can be considered harassment in violation of this policy. In general, any conduct based on these traits that could interfere with an individual's work performance or could create an offensive environment will be considered harassment in violation of this policy. This is the case even if the offending employee did not mean to be offensive. It is essential that employees be sensitive to the feelings of others.

- a. Sexual harassment, or harassment based on gender identity (whether opposite-sex or same-sex, or based on gender identity) is strictly prohibited. Examples include but not limited to the following:
  - Sexually offensive jokes or comments.
  - "Sexist" or "discriminatory" comments or behavior (in other words, conduct that demeans other individuals because of their sex, gender identity).
  - Physical assaults, inappropriate staring or other touching that is sexual in nature.
  - Promising favorable treatment or threatening unfavorable treatment based on the employee's response to sexual demands.
  - Displays of sexually oriented reading materials or pictures, including electronic materials.
  - Punishing an employee for complaining about harassment, including but not limited to, any of the above.



# 25. Breach of Savola Foods Code of Conduct

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Employees are required to perform their work with precision and honesty, exercising all necessary due diligence in all aspects of their assigned tasks and duties to ensure the satisfaction of Savola Foods' policies and goals. All Employees are requested to exercise all due diligence and care in the service of Savola Foods' customers and clients, and the full and accurate completion of their transactions, and to inform Savola Foods Management if there is any breach of the code of conduct. **Please refer to How to Report a Business Misconduct Case**, Savola Integrity Hotline.