

Code of Conduct

For all employees of the Hochland Group





Contents

Preamble	3
1 Basic Conduct	3
1.1 Observing laws and internal guidelines	4
1.2 Mutual respect	4
1.3 Reliability	4
1.4 Hochland's reputation	4
2 Dealing with business partners and third parties	4
2.1 Competition law and cartel law	4
2.2 The granting and acceptance of benefits	5
2.3 Expectations with regard to suppliers and service providers	5
3 Dealing with employees and social partners	6
3.1 Anti-discrimination	6
3.2 Working conditions	6
3.3 Management culture	6
3.4 Freedom of assembly and association	6
4 Conflicts of interest	7
5 Handling company property and information	7
5.1 Protecting company property	7
5.2 Information confidentiality	7
5.3 Transparent processes and truthful reporting	7
6 Sustainable economy	8
7 Complaints and notifications	8
8 The consequences of violations	8



Preamble

Since the company was founded in 1927, the Hochland family has become one of the leading cheese producers in Europe. This successful development has been possible thanks to a combination of high-quality products, consumer familiarity with the company's brands, customer relations nurtured over many years, brave business decisions and highly-motivated and competent employees.

Our business practices are based on values, adherence to which is of great importance to our shareholders and management alike. In addition to setting high standards in terms of the quality of our products and our performance, these values also include a high level of appreciation for every individual, a target-orientated and results-orientated approach to business and our company's independence. We take our responsibility towards our employees, our business partners, the environment and the society very seriously.

The purpose of this Code of Conduct is to define more precisely the values that we pursue in the way we work, and to explain our claim to ethical and legal behaviour. It defines the rules that should guide the conduct of our employees, and applies without limitation to all Hochland employees.

We call upon all employees to live by the Hochland values and to observe the content of this Code of Conduct in the course of their daily work.

2nd edition

Heimenkirch, April 2016

Peter Stahl

Thomas Brunner

Hubert Staub



1 Basic conduct

1.1 Observing laws and internal guidelines

Laws and other legal and tax-related regulations must be observed by the Hochland companies in every country along with internal guidelines. Employees have an obligation to be familiar with and to follow the legal requirements and internal guidelines that are relevant to their work.

1.2 Mutual respect

One of our most important values is respect for every individual that extends far beyond that person's economic benefit to the company. We treat our employees and business partners with fairness and tolerance. All discrimination, sexual harassment or any other form of personal attack on individuals by employees of a Hochland company violates our group principles and will not be tolerated.

1.3 Reliability

Reliability, openness, and honesty are virtues that we at Hochland value and support. Every employee is responsible for his/her own conduct. We promise only what is possible, and that maintains our credibility.

1.4 Hochland's reputation

Every Hochland employee represents our company through his/her actions and behaviour. Violations of legal requirements and of our own values can significantly damage the reputation of Hochland and our brands, and must therefore be avoided.

2 Dealing with business partners and third parties

2.1 Competition law and cartel law

We are competing with other companies on both the procurement and sales markets. Our conviction is that this competition must be conducted by fair means and within the framework of the law, and that we can prevail by virtue of our own Hochland strengths. Every employee has an obligation to ensure that no illegal means are used in order to gain an advantage.



The following in particular are prohibited:

- Exchanging with competitors information about prices, calculations, costs, margins, production output or other data relevant to competition.
- Discussions about dividing up geographical areas, customers or supply sources, the submission procedure for quotations, agreements not to enter into competition with a competitor, joint action against suppliers or customers, or other actions that hinder competition.
- Improper agreements on price fixing or exerting pressure in order to influence our customers' resale prices.
- Passing on information about customers/suppliers to other customers/suppliers.

2.2 The granting and acceptance of benefits

We expressly reject bribery as a means of gaining competitive advantages - which means that it is forbidden for employees to offer or guarantee advantages to office-holders or business partners with the aim of winning orders or gaining other advantages.

Also, no Hochland employee is allowed to use his/her position in the company in order to request or accept personal advantages.

An employee must inform his/her superior immediately if he/she is confronted with requests to grant advantages, or if business partners or third parties offer him/her such advantages. The giving or acceptance of occasional gifts or courtesy gifts of symbolic value, and reasonable invitations to meals or events, are allowed as a matter of principle.

2.3 Expectations with regard to suppliers and service providers

As a company of integrity, Hochland wishes to collaborate with similar business partners. We therefore expect our suppliers and service providers to conform to these values and to obey the relevant laws, reject corruption, uphold human rights and labour laws (including laws prohibiting child labour), take precautionary measures to protect the environment and also demand the same in their own supply chains.



3 Dealing with employees and social partners

3.1 Anti-discrimination

We treat our employees with fairness and tolerance. We reject discrimination based on nationality, ethnic origin, skin colour, gender, religion, culture, appearance, disability, age, sexual orientation, political opinion, membership of trade unions or other employees' representative bodies.

3.2 Working conditions

To us, respect for our employees also means providing a place of work that offers them the highest possible degree of safety. It is the responsibility of all employees to take safety precautions and to report safety deficiencies and possible accident hazards to their respective superior so that appropriate action can be taken.

Employees receive reasonable payment. The laws covering hours of work and holiday entitlement are observed. Child labour and any form of forced or compulsory labour will not be tolerated.

3.3 Management culture

To us, management means assuming responsibility for the employees in the company's care. Every manager must strive to gain the recognition of the employees under them through exemplary conduct, performance, openness and social competence. To this end, they must observe the Hochland guidelines on management and cooperation, along with this Code of Conduct. Their responsibility also covers supporting employees in their development via challenging tasks and suitable training.

3.4 Freedom of assembly and association

Hochland recognises the right of its employees to assemble, organise and join trade unions of their choice. We desire open and trust-based cooperation with democratically legitimate employee representatives.



4 Conflicts of interest

In the context of a target-orientated and results-orientated approach, employees must - to the best of their knowledge - always make business decisions primarily in the interests of Hochland, while also taking into account the legitimate interests of our customers and business partners. It is not permitted for an employee to pursue their own interests to the detriment of Hochland. Every employee is therefore obligated to disclose any possible conflicts of interest to his/her superior or to another person in whom they have trust.

5 Handling company property and information

5.1 Protecting company property

Hochland provides its employees with machines/plant, IT, office and communications equipment and much more to enable them to perform their daily work. Employees must use this company property correctly, responsibly, carefully and economically.

The private or illegal use of Internet and e-mail applications provided by the company is prohibited.

5.2 Information confidentiality

Information about Hochland or its business partners must always be treated in confidence and may not be passed on to unauthorised third parties. This confidentiality obligation also remains in force after an employee ceases working for the company. It is not permitted for an employee to use confidential information to their own personal advantage.

The employees concerned must handle personal data responsibly and in accordance with the law and the Hochland data protection directives.

5.3 Transparent processes and truthful reporting

Processes at Hochland should be as transparent as possible in order to guarantee the best possible controllability and to make results comprehensible. All books, records and reports to be kept are true and complete, and conform to the rules and standards that apply to them.



6 Sustainable economy

To us, sustainable economy means dealing with consumers, customers, suppliers, employees and capital investors both responsibly and with a view to the long term. As a foodstuffs producer, conservation of the environment and of nature is especially important to Hochland - both for ourselves and for future generations. All employees have a responsibility to act with quality and the consumer in mind, and to protect the environment through the efficient use of resources, avoiding waste and recycling.

7 Complaints and notifications

Contact partners for all employees if they have questions relating to this Code of Conduct or wish to serve notification that it has been contravened are that employee's superior and the employee representatives. In addition, every employee can also contact:

**Stefan Heinz /
Internal Auditor**

Tel.: + 49 8381 502 329
Fax: + 49 8381 502 52 329
stefan.heinz@hochland.com
Kemptener Str. 17
88178 Heimenkirch
Germany

**Heidi Früh /
Division Manager Coordinator HR**

Tel.: + 49 8381 502 693
Fax: + 49 8381 502 52 693
heidi.frueh@hochland.com
Kemptener Str. 17
88178 Heimenkirch
Germany

This also applies to notifications regarding the need to adapt the Code of Conduct itself. All notifications, questions and complaints will be treated in confidence. Hochland also makes every effort to maintain a well-defined feedback culture in which every employee should be able to state their opinion openly and honestly without fear of reprisals.

Any employee can submit notifications in his/her own language.

8 The consequences of violations

This Code of Conduct is binding on all Hochland employees. Following a thorough evaluation and irrespective of the person's position within the company, contraventions will be subject to sanction in accordance with the rules that apply in the country and location in question.