

# ETHICS POLICY AND CODE OF CONDUCT



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#### Introduction

For Inleit Ingredients, our business activity must be carried out respecting high ethical standards. This is the reason for establishing this Code of Conduct and ethical policy.

At Inleit, we operate in different legal and cultural environments worldwide. Regardless of this fact, this Code stipulates the minimum requirements that must be met by all personnel working in our companies, and we expect our suppliers and subcontractors to meet or ensure that their requirements are consistent with our own corporate principles.



## 1. Business Integrity

At Inleit, we are committed to the highest standards of business integrity. We will not tolerate any practice inconsistent with the principles of honesty, integrity, and fairness wherever we operate.

Inleit's ethical standards are set out in our Business Integrity Statement, which provides the following points:

- ✓ Abide by all applicable laws and regulations.
- ✓ Treat others with fairness, dignity, and respect.
- ✓ Prepare all records of financial transactions with care and accuracy.
- ✓ Report economic conditions and results of operations honestly and promptly.
- ✓ Treat customers, consumers, suppliers, and financial partners honestly and fairly.
- ✓ Avoid actual and potential conflicts of interest.
- ✓ Protect Inleit's assets.
- ✓ Protect confidential and proprietary information (and in the manner described in Item 4 below on Protection of Information).
- ✓ Protect Inleit's reputation.
- ✓ Separate individual political activities from Inleit's business activities.
- ✓ Report any violation of ethical standards and applicable laws and regulations.

**Inleit does not** engage in unfair competition or participate in any specific form of bribery.



## 2. Human Rights and fundamental rights at Work

At Inleit, we are firmly committed to respect for human rights wherever we do business. We will embody this commitment by working to implement and reinforce practices and procedures that prevent, mitigate, and, where appropriate, remedy adverse human rights impacts that may arise directly from our operations or that may be directly linked to our business through our relationships with Suppliers. Our commitment and implementation of such practices and procedures are based on international instruments such as the Universal Declaration of Human Rights, the ILO Statement on Fundamental Principles and Rights at Work, the OECD Guidelines for Multinational Enterprises, and the United Nations Guiding Principles on Business and Human Rights.

We expect our Suppliers to conduct their business in a manner that demonstrates their respect for human rights, to be consistent with the principles we have mentioned, and to take all reasonable steps required to address human rights hazards in their existing supply chains or any part of their own business.

# Elimination of all forms of forced or compulsory labor

**Inleit does not use** slave labor, bonded labor, indentured labor, indentured servitude, or any other form of involuntary forced labor.

Inleit guarantees that the work is performed willingly, in exchange for legitimate remuneration, and that the employee is not subject to any criminal penalties or persecution, whether actual or threatened or to conditions of violence, confinement, retention of identity documents, or waiver of rights or privileges to which they are entitled by law. Los trabajadores deberán ser libres a la hora de aceptar el empleo y serán libres de abandonarlo en cualquier momento, notificándolo dentro de un plazo razonable, de conformidad con la legislación y la normativa aplicables, con los acuerdos colectivos y con las restricciones operativas.

**Inleit does not** permit forced debt bondage labor, which involves employers offering labor recruiters loans or wage advances in exchange for a worker or a member of the worker's family offering their labor as collateral for repayment of the loan.

#### Effective abolition of child labor

**Inleit** only admits workers of legal working age in the relevant countries or jurisdictions. If no minimum working age is established, the minimum working age is 16. Irrespective of the legal minimum age and in cases where minors are authorized to work. All legal requirements **must be met**, particularly regarding working hours, wages, minimum education, and working conditions.

**Inleit shall** establish and respect clear age limits for work that may be dangerous or harmful to young workers from a mental, physical, social, or moral point of view. Young workers are defined as workers who have reached the minimum age, as explained above but have yet to reach 18.



# Elimination of discrimination in respect of employment and occupation.

**Inleit does not** discriminate against employees in hiring, promotion, salary, performance evaluation, or any other employment status-based race, color, national origin, gender, gender identity, sexual orientation, religion, or disability. Therefore, employees shall not be discriminated against on any other basis prohibited by applicable laws and regulations.

# Freedom of association and the effective recognition of the right to collective bargaining

**Inleit respects** the right of employees to affiliate or not affiliate with a union of their choice and to engage in collective bargaining, free from any form of retaliation, intimidation, or harassment. Employees shall not be subjected to intimidation or harassment when exercising their right to affiliate or not to affiliate with a union.

#### Wages and benefits

**Inleit** will not pay less than the minimum wage stipulated by applicable laws and regulations.

At **Inleit**, we guarantee that employees will not be forced to work overtime to earn a minimum wage or to receive all mandatory and insurance benefits required by applicable laws and regulations.

#### **Working hours**

**Inleit** does not require employees to work beyond the legal overtime thresholds, except in the case of an emergency or if it is legitimate due to the nature of the work.

#### **Health and Safety**

Health and safety is an integral part of the mission of all Inleit companies to improve the quality of life. At Inleit, we are committed to implementing a global health and safety culture and outstanding health and safety performance.

At **Inleit**, we provide a safe and healthy workplace and working conditions. Health, safety, and other workplace standards shall, as a minimum, comply with all applicable laws and regulations.

**Inleit** will maintain in force, at its own expense, a public or private workers' compensation plan (such as workers' compensation insurance), as required by applicable laws and regulations.

#### **Disciplinary practices**

**Inleit** treats everyone with dignity. At Inleit, it is prohibited to inflict or threaten to inflict corporal punishment or any other type of physical, sexual, psychological, or verbal abuse or harassment on an employee.

**Inleit** has a straightforward disciplinary process that prohibits violence, harassment, or intimidation, both physical and emotional.



### 3. Delivery Documentation

Inleit will provide all personnel working in our company in an accurate and timely manner with the training and information they need so that they can work in compliance with all the requirements of this policy and code of ethics as well as comply with applicable laws and regulations.

## 4. Information protection and Data privacy

#### **Confidentiality and protection of information**

**Inleit** is highly committed to protecting the confidential information of all persons who work or collaborate with the companies that make up our group, including suppliers, customers, consumers, and employees, ensuring that such information is used within the framework of the applicable legislation and respecting **Inleit**'s policies and that it is information related only to **Inleit**'s activity.

At **Inleit**, we adhere to all applicable laws and regulations governing protected information. We safeguard all information received, ensuring that such information is used only for authorized purposes, is shared only with authorized persons, and is stored appropriately and securely. Suppliers with access to such information or any other information classified as confidential information of the company about specific individuals must be authorized for the use and safekeeping of such data following the products or services they are providing and adapt them to the legislation in force.

#### Data protection and confidentiality

**Inleit** is committed to meeting the confidentiality expectations of the personal information of everyone who works with us, including suppliers, customers, consumers, and other individuals and organizations, ensuring that such information is used within the framework of applicable law and is only related to **Inleit**'s business.

Suppliers shall comply with applicable privacy and data protection legislation and associated regulatory requirements and abide by **Inleit**'s privacy and protection policies when collecting, storing, processing, disclosing, transferring, and/or sharing personal information.



# **Implementation**

Inleit takes the appropriate measures to ensure that the principles of this Code are communicated to its employees and all its supply chains.

Inleit has established means and channels of communication for any suggestion or complaint, through "suggestion boxes" implemented both on our company website and in plants and offices, communications via e-mail, so that employees can raise their doubts or concerns without fear reprisals or negative repercussions.

Inleit reserves the right to carry out any controls we deem appropriate to ensure that this Code is respected by all employees and suppliers working or collaborating with our companies.

This Code will be updated occasionally to maintain its relevance based on feedback from internal and external stakeholders.

In Curtis, April 1st 2023





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