

Seeberger GmbH
Seeberger Professional GmbH
Seeberger Genusswelt GmbH

Supplier and Business Partner Code of Conduct

Ethical Standards and
Expectations for our
Suppliers





Contents

Preamble	1
Compliance with laws and international regulations	1
Human rights and social responsibility	2
Prohibition of child labor	2
Prohibition of forced labor and modern slavery	2
Freedom of association and the right to collective bargaining	3
No discrimination and harassment	3
Fair working conditions	3
Health and safety at the workplace	4
Prohibition of land, forest, and water grabbing	4
Environmental responsibility	5
Responsible use of resources	5
Waste management	5
Safe and responsible handling of chemicals	6
Climate protection & emissions reduction	6
Protection of biodiversity and forests	6
Ethical business conduct	7
Data protection and information security	7
Reporting of violations	7
Implementation and continuous improvement of the Code of Conduct	8



Seeberger Supplier and Business Partner Code of Conduct

Preamble

For over 180 years, Seeberger (hereinafter also referred to as “we,” “us,” “our,” or “Seeberger”) has stood for premium natural products and the highest quality standards as a family-owned company. Sustainable action is a fundamental part of our quality philosophy, as we believe that only through responsible decisions can we ensure a healthy environment for our generations. The diversity and range of our products require global sourcing that takes into account a wide variety of climatic growing conditions. In doing so, we aim to improve the living and working conditions of producers and processors in the countries of origin while conserving natural resources. We are firmly committed to respecting human rights, protecting the environment, and conducting fair business practices – and we expect the same from our business partners. Our expectations regarding integrity, fairness, and sustainability are set out in the [Seeberger Code of Conduct for Employees](#).

Compliance with laws and international regulations

In the Seeberger Supplier and Business Partner Code of Conduct (CoC), we define the fundamental principles and requirements applicable to our business partners (i.e., contracting parties, suppliers, producers, and service providers involved in the manufacture and/or delivery of goods and services for Seeberger). Furthermore, we expect our business partners to make reasonable efforts to promote these requirements within their supply chains and to pass them on to indirect suppliers. We expect compliance with all applicable legal regulations as well as with the following international guidelines and principles, which serve as minimum standards for our business relationships:

- Universal Declaration of Human Rights (UDHR)
- United Nations Global Compact (UNGC)
- Core Labour Standards of the International Labour Organization (ILO)
- United Nations Sustainable Development Goals (SDGs)
- OECD Guidelines for Multinational Enterprises

In addition, all relevant national laws and regulations must be observed. Where different legal provisions apply concurrently, the regulation offering the highest level of protection and safety for employees shall take precedence.

1. Human rights and social responsibility

We are committed to ensuring that our business activities positively impact the community and society as a whole. Respect for human rights is an essential foundation of responsible corporate governance at Seeberger. Together with our business partners, we take responsibility for protecting our employees along the value chain as well as the communities we are connected with.

1.1 Prohibition of child labor

At Seeberger, child labor is strictly prohibited and must not be used or supported in any form. The minimum age for employment is determined by the applicable national laws and must not be lower than the age at which compulsory education ends under national legislation. However, in no case may the minimum working age be below 15 years, unless one of the recognized exceptions under ILO Convention No. 138 applies (see Article 2(4), Articles 4 to 8), and the law of the place of employment explicitly permits such an exception. Furthermore, it must be ensured that young workers under the age of 18 are not engaged in work that could be potentially harmful to their physical or mental health, safety, or moral development. If the applicable local laws at the place of employment set stricter standards regarding child labor, those stricter standards shall take precedence. (Based on ILO Conventions 79, 138, 142, 182)

1.2 Prohibition of forced labor and modern slavery

No forced labor, modern slavery, or similar practices may occur at any point along our supply chains. All work must be performed voluntarily and must be free from punishment, threats, violence, or any other form of coercion. Employers must not retain identity documents (e.g., passports, work permits, or any other personal legal documents) or require the deposit of money as a condition of employment. Workers must have the right to leave their workplace at any time. Every employee is entitled to a written employment contract in a language they can understand, clearly and transparently outlining the essential terms and conditions of employment. Workers must not be subjected to any form of unacceptable treatment, including psychological hardship, economic or sexual exploitation, or humiliation. (Based on ILO Conventions 29 and 105)

1.3 Freedom of association and the right to collective bargaining

Employees have the right to form and join workers' representations, to engage in collective bargaining, and to exercise the right to strike – including the right not to do so. Membership in trade unions or workers' organizations, as well as participation in strikes, must not result in any form of disadvantage, such as discrimination, intimidation, or retaliation. In cases where freedom of association and the right to collective bargaining are legally restricted, alternative means of independent and free association for the purpose of collective bargaining must be supported.

(Based on ILO Conventions 87, 98, 135, 154)

1.4 No discrimination and harassment

Seeberger is committed to treating business partners throughout the entire supply chain with respect and fairness. We place great importance on ensuring that no one is discriminated against on the basis of gender, gender identity, national or social origin, ethnic background, skin color, religion or belief, sexual orientation, political opinion, age, disability, marital status, pregnancy, family situation, or any other personal characteristic. We therefore expect our business partners to refrain from any form of inappropriate behavior – including corporal punishment, threats of violence, or harassment and abuse in physical, sexual, psychological, or verbal form. (Based on ILO Conventions 110, 111, 159, 190)

1.5 Fair working conditions

Compensation for regular working hours and overtime must at least comply with the national minimum wage or prevailing industry standards – whichever is higher. Wages should be sufficient to cover basic living expenses and allow for a minimum level of savings. Where no statutory minimum wage is defined by applicable law, wages must be set at a level that meets the basic needs outlined in the ILO Convention concerning Minimum Wage Fixing. (Based on ILO Convention 131) Wage deductions used as a disciplinary measure are not permitted. Employers should provide employees with regular, written, clear, and transparent information regarding their compensation. Our business partners are also expected to ensure the implementation of transparent working time regulations and the observance of appropriate rest breaks and recovery periods.

1.6 Health and safety at the workplace

Our business partners are required to ensure a safe and healthy working environment. This includes the implementation of effective occupational health and safety measures that minimize the risk of physical or mental exhaustion, illness, and accidents. The use of appropriate protective measures—such as the provision of personal protective equipment—is essential. Employees must be regularly informed about applicable health and safety standards and related measures. In addition, access to adequate drinking water and clean, sanitary facilities must be ensured at all times. (Based on ILO Conventions 1, 14, 155, 164)

1.7 Prohibition of land, forest, and water grabbing

Legitimate ownership, possession, and usage rights—as well as international, national, local, and traditional rights, particularly those of Indigenous communities — must be respected in the cultivation of raw materials and throughout the entire supply chain. Farmers and/or communities must not fall victim to land grabbing, lose their land rights due to unclear ownership structures, or be displaced from land they have used over a long period for agricultural purposes. (Based on ILO Convention 169)



2. Environmental responsibility

Environmental protection is a core part of our values. We rely on sustainable agriculture and the responsible use of resources to ensure the quality and long-term availability of our products. We expect our business partners to comply with all applicable national and international environmental laws and agreements, and to actively implement measures that minimize environmental impact and promote sustainable practices. Environmental risks must be systematically identified, avoided, and addressed proactively – especially those that could have potential impacts on human health.

2.1 Responsible use of resources

We expect our business partners to handle natural resources (such as soil, water, air, and biodiversity) responsibly. This includes reducing energy and material consumption and applying the principles of the circular economy. Sustainable water management, soil protection, and the implementation of environmentally friendly technologies that conserve energy and water should be actively pursued. Our business partners are expected to use plant protection products and fertilizers responsibly –by equipping workers with protective gear, providing training on safe application, refraining from the use of banned substances, and ensuring proper storage and disposal in compliance with legal requirements. Overall, transparent measures and effective management systems should be implemented to optimize resource use in a sustainable manner.

2.2 Waste management

Our business partners are expected to take a systematic approach to identifying, responsibly managing, reducing, and properly disposing of, recycling, or reusing waste in an environmentally sound manner. In the context of the German Supply Chain Due Diligence Act (LkSG), the requirements of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal must be observed.

2.3 Safe and responsible handling of chemicals

Comprehensive hazardous substances management ensures the safe handling of chemicals—from processing and storage to transport, treatment, and environmentally sound disposal or recycling. In line with the German Supply Chain Due Diligence Act (LkSG), our business partners are required to comply with the Minamata Convention on Mercury and the Stockholm Convention on Persistent Organic Pollutants (POPs Convention).

2.4 Climate protection & emissions reduction

Climate protection is a core priority for Seeberger. By joining the Science Based Targets initiative (SBTi), we have committed to reducing our emissions in line with global climate goals. Our business partners play a critical role in achieving this objective. We therefore expect our suppliers to measure their emissions (Scopes 1, 2, and 3), implement reduction measures, and disclose them transparently. Where technically and economically feasible, we encourage our suppliers to transition to renewable or low-carbon energy sources and contribute to mitigating global warming. A close and trusting collaboration is essential to us in order to advance climate protection together.

2.5 Protection of biodiversity and forests

Nature is the foundation of our lives and our business. As a food company, we depend on intact ecosystems that must be preserved for future generations. We therefore expect our business partners to implement sustainable agricultural practices that protect and promote biodiversity. This includes preserving fertile soils, safeguarding genetic diversity, natural resources, and habitats, as well as protecting endangered species. Forests and valuable ecosystems should be given special protection to counteract climate change and biodiversity loss. The clearing of native vegetation for agricultural purposes must be avoided. Our business partners are expected to ensure that their products are not associated with deforestation or illegal land use. This includes ensuring transparent supply chain traceability and implementing targeted measures to prevent land grabbing.

3. Ethical business conduct

We pursue only legitimate business objectives and practices and collaborate exclusively with partners who share these values. We therefore expect our business partners to respect the cultural, legal, economic, and social conditions of the countries and regions in which they operate. Our business partners must comply with all applicable laws and regulations regarding anti-corruption, bribery, fraud, extortion, and money laundering. In particular, gifts, hospitality, or payments must not be offered, accepted, promised, or solicited if they are intended to improperly influence business decisions or relationships. Any decisions regarding cooperation with Seeberger must be based solely on factual and objective criteria. Furthermore, our business partners are required to adhere to the principles of fair competition, in particular by complying with antitrust and other competition laws. They are also expected to fully comply with all legal obligations related to the prevention of money laundering.

3.1 Data protection and information security

Our business partners are required to fully comply with all applicable data protection laws. This includes the careful protection of personal data and its processing solely on a lawful basis. Any unauthorized disclosure or misuse of personal data constitutes a clear violation of applicable data protection regulations.

In addition, we expect our business partners to manage information systems that contain confidential information or data belonging to Seeberger responsibly. These systems must be effectively protected against unauthorized access through appropriate technical and organizational measures.

3.2 Reporting of violations

Business partners must inform Seeberger in a timely manner of any identified risks or violations of the principles outlined in this Code of Conduct, as well as of the corrective actions taken. Such reports may be made directly or anonymously, without the reporting person having to fear any form of retaliation, harassment, or discrimination. An online whistleblowing system is available for this purpose and can be accessed via the QR code provided. We also encourage our business partners to communicate the availability of this reporting channel to their own employees and suppliers.



3.3 Implementation and continuous improvement of the Code of Conduct

We aim to establish long-term and trusting relationships with our business partners throughout the entire supply chain. Together, we work on solutions and measures to ensure compliance with this Code of Conduct, with the goal of deepening our collaboration and securing a sustainable and responsible supply chain. In the event of violations of the expectations outlined in this Code, the business partner is obligated to inform us without delay, initiate appropriate corrective actions, document and implement them. In cases of serious violations, the business partner is expected to collaborate with us in the development and implementation of remedial and preventive measures.

To ensure compliance with the Code of Conduct, reviews may be initiated in the event of concrete suspicions of significant breaches of human rights or environmental standards—such as audits carried out by external, independent service providers. Such reviews will only be conducted when credible indications are present and after prior notification. The associated costs shall be borne by the business partner. As part of the review, access to relevant documents must be granted. The scope of the review is limited to what is necessary to clarify the matter and will preserve the protection of trade and business secrets.

Violations of the human rights or environmental expectations listed herein are considered serious disruptions of the business relationship. If the business partner fails to take corrective actions or refuses to agree to proposed improvement measures, Seeberger reserves the right to suspend the business relationship in whole or in part. In the event of repeated non-compliance after a reasonable grace period, Seeberger may terminate the contract as a last resort.

We encourage our business partners to proactively contribute innovative ideas that promote social, environmental, or economic improvements. Seeberger values open dialogue on new approaches and looks forward to making progress together and continuously evolving in close cooperation with its business partners.

Legal notice

Seeberger GmbH

Hans-Lorensen-Straße 36

89079 Ulm

Germany

Telefon +49 731 4093-0

Telefax +49 731 4093-66 5000

info@seeberger.de

HRB 728251 Amtsgericht Ulm

Head office: Ulm

Managing directors: Ralph Beranek, Clemens Keller

VAT ID no.: DE284328280

Status as of: Mai 2025



