

Valora Business Partner Code of Conduct

Valora is committed to upholding the highest standards of business ethics and integrity as set out in the Valora Code of Conduct. Valora is committed to the principle of strict legality for all acts, measures, contracts and other dealings of the Valora Group. Compliance with the principle of legality also implies the payment of taxes and customs duties owed, compliance with competition and antitrust laws, the strict prohibition of corruption and money laundering, obtaining the requisite official authorisations, and respecting the legal rights of third parties.

Valora expects of all of its business partners (e.g., suppliers of goods and services, landlords, agencies, and franchisees) that they will also act in compliance with such laws, standards, and principles of business ethics. Business partners are therefore expected to comply with the requirements of the Valora Business Partner Code of Conduct. In addition, Valora and its business partners may agree to additional requirements in the individual contracts.

1. Human rights

In line with the aforementioned business ethics and aforesaid standards of conduct, Valora expects its business partners to comply with the following business practice:

- to show respect for the personal values, privacy and individual rights of every individual;
- to refrain from employing anyone against their will or by force; and
- to eliminate conduct, including gestures, references and physical contact, which is any way sexual, violent, threatening, abusive or exploitative.

2. Fair working conditions

Business partners should be concerned to ensure fair working conditions. In particular, they should:

- eliminate discrimination in the workplace based on sex, skin colour, ethnic origin, religion, disability, union membership or political affiliation or sexual orientation and comply with all valid laws for the avoidance of discrimination in the workplace;
- respect the rights of employees to freedom of assembly and collective bargaining;
- refrain from using forced or mandatory labour or compulsory prison labour and allow all employees the freedom to terminate their employment contract subject to a reasonable notice period;
- pay their employees fairly and comply with local wage agreements and collective agreements and/or, where these do not exist, pay employees enough for them to satisfy their basic needs.

Business partners shall, in no phase or area of their operations, deploy or tolerate child labour which does not comply with valid laws and provisions.

3. Health and safety at work

3.1 General principles Health and safety

Business partners should be concerned to create a safe and healthy working environment, including living accommodation provided by the company. Business partners will have a Health and Safety Plan to define, implement and monitor guidelines and management systems, which also covers compliance with regional and national provisions.

3.2 Health and protection of employees

Business partners protect their employees against excessive exposure to chemical, biological and physical risks in the workplace as well as against risks relating to the infrastructure used by employees.

3.3 Maintenance, emergency preparedness and response

Business partners shall provide plans for running and maintaining all of their operational processes as safely as possible. Business partners shall identify and assess possible emergency situations in the workplace and minimize their impact by implementing emergency response plans and procedures.

3.4 Information and training in relation to risks

Safety information must be available for the purposes of further education, training and protecting employees against risks.

4. Ecological responsibility

Business partners undertake to protect the environment and will carry out their business operations on an ecologically responsible basis.

5. Business ethics

Business partners shall be concerned to carry on their business ethically and in accordance with all valid rules and provisions.

5.1 Avoidance of conflicts of interest

Business partners are expected to make decisions on the basis of objective considerations and to not allow itself to be unduly influenced in its decisions by personal interests. Where a business partner becomes aware of a potential conflict of interest, it is to inform Valora thereof without delay.

5.2 Free competition

Business partners are expected to conduct themselves in accordance with the principles of fair competition and to comply with all applicable legal provisions for the protection of fair competition. In addition, business partners must not enter into any agreements or engage in concerted practices with other undertakings with the intent of preventing, limiting, or distorting competition as defined by the applicable antitrust provisions of law; business partners may also not exploit any dominant market position in an unlawful manner.

5.3 Corruption

Business partners must ensure compliance with all applicable anti-corruption laws. In particular, business partners are to make certain that their employees, sub-contractors, or representatives do not offer, promise, or grant any advantages to employees of the Valora group with the intent to obtain a contract or receive any other form of preferential treatment in their business dealings. These rules also apply where business partners work in collaboration with other third parties within the framework of their activities on behalf of Valora.

5.4 Business information and trade secrets

Business partners are responsible for ensuring that confidential business information or business secrets that come to their knowledge in connection with their business dealings with Valora are treated with the strictest of confidentiality and are not used in an improper manner or disclosed to third parties. This applies also following termination of the business relationship.

5.5 Data protection

Business partners undertake to ensure that their employees are offered adequate protection of their rights to privacy and of their personal data, and that compliance is maintained with all legal provisions governing the protection of data.

5.6 Money laundering

Business partners are to maintain compliance with all relevant legal provisions for the prevention of money laundering.

6. Business partner suppliers

Valora expects of its business partners that they will require their sub-suppliers to maintain compliance with equivalent standards of business ethics and integrity.

7. Expressing concerns

Business partners shall urge their employees to express concerns or report unlawful activities in the workplace without fear of reprisals, intimidation or harassment. Business partners shall investigate such incidents and where appropriate take corrective measures. All reported cases shall be officially recorded by business partners.

In the event that a business partner has any reservations with regard to this Code of Conduct or its implementation, the business partner may address those concerns directly to its contact person at Valora. Should a business partner wish for any reason to report on a matter of concern in a confidential manner or via another channel, Valora also provides a special reporting tool for that purpose, the Valora Integrity Line (<https://valora.integrityline.org>). If necessary, the tool may also be used anonymously.