



**Declaration of principle
of the Heidemark Group
respect for human rights and the
associated environmental standards**

Foreword by the management

As a family-run company with a long-standing tradition, we have always endeavoured to secure the trust of our employees, business partners and customers by acting with integrity and in compliance with the law. We realise that a team is only as strong as its weakest link. For this reason, it is of paramount importance that our business activities are always orientated towards the applicable laws and our internal company guidelines.

The cornerstones of the HEIDEMARK Group's corporate culture are morally impeccable behaviour as well as integrity and compliance with the rules without exception. All our employees and business partners are required to comply with applicable laws and internal company guidelines. The HEIDEMARK Group will support its employees and business partners in acquiring the necessary knowledge to ensure compliant behaviour on their own responsibility and in a self-determined manner.

Furthermore, it is important to us that both our employees and our business partners treat each other fairly and respectfully. We expect our employees and business partners to act in accordance with the fundamental values of fairness and honesty, particularly with regard to the treatment of people, animals and the environment.

In line with these values, respect for human rights and compliance with environmental standards are fundamental pillars of our business activities. And not only in relation to our own company, but also in relation to our supply and value chains.

We sensitise our employees to issues relating to human rights and environmental standards with the aim of protecting the rights of people and communities in our value chain in collaboration with our business partners. To this end, we have developed defined processes to identify and prioritise human rights and environmental risks and take appropriate countermeasures. We expect our partners to also comply with the relevant national and internationally recognised standards, to strive for sustainable business practices and to pass on these expectations along their value chain.

Our declaration of principles on respecting human rights and the associated environmental standards reaffirms our ongoing commitment. We will regularly review implemented processes and measures and adapt them as necessary in order to continuously fulfil our corporate due diligence obligations.

Management of the HEIDEMARK Group

Who we are and what we stand for

HEIDEMARK is your first point of contact for turkey meat products throughout Europe. As an industry leader, we stand for precisely coordinated processing steps, maximum flexibility and maximum reliability in terms of quality and volume. We actively provide our customers with impulses for a market-driven and contemporary product range and also fulfil short-term customer requirements with maximum product availability. Our roots go back to 1965, since when HEIDEMARK has established itself as the market leader through animal welfare, product quality and sustainability. Today, the company is one of the largest in its sector in Europe. From Ahlhorn in Lower Saxony, we supply customers throughout Europe - now in the third generation of family management.

HEIDEMARK attaches great importance to sustainable behaviour as an expression of corporate responsibility. Our actions today are intended to meet the current and future needs of our society on the one hand and to secure our long-term business activities on the other. A self-critical view is a matter of course for us as market leader. We understand sustainability to mean the development of sustainable turkey farming, taking into account economic, ecological and social factors.

As a company, we respect the human rights and dignity of all people affected by our business activities and conduct our business in an appropriate manner. This includes all our employees, contractors and external stakeholders. We consider the protection of human rights to be a central element of our corporate responsibility. We therefore respect human rights in our own business activities and in our global supply and value chains.

Our commitment to respecting human rights is based on

- the International Bill of Human Rights, i.e. the United Nations Universal Declaration of Human Rights,
- the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles),
- the OECD Guidelines for Multinational Enterprises,
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organization (ILO core labour standard),
- International Covenant on Economic, Social and Cultural Rights and
- International Covenant on Civil and Political Rights.

In addition to the aforementioned international standards, we also comply with the relevant national regulations, in particular the requirements of the German Supply Chain Duty of Care Act (LkSG), so that we always keep an eye on the value chain in addition to our own business area.

In doing so, we are playing our part in implementing the United Nations Sustainable Development Goals (SDGs). We have firmly anchored these principles in our corporate philosophy.

For reasons of better readability, the simultaneous use of masculine and feminine language forms is avoided. All personal designations apply to both genders.

Our commitment to human rights and environmental standards

We are committed to respecting internationally recognised human rights and upholding them in our business activities and along our value chains.

In particular, we are committed to identifying the most important human rights risks as part of our human rights strategy, preventing them and countering violations in an appropriate manner. These include in particular

Child labour

Heidemark fundamentally rejects any kind of child labour. It is assumed that the minimum age for admission to work in accordance with ILO Convention No. 138 is not less than the age of completion of compulsory education in the respective country and in no case less than 15 years. Employees under the age of 18 are excluded from work that is considered dangerous, unsafe or harmful to health.

Forced labour

Forced or compulsory labour is any type of work, employment or service that is not voluntary and is performed under threat of punishment. No one may be employed or forced to work against their will, not even in the context of prison labour.

The ban includes all forms of slavery-like practices, servitude and oppression.

Discrimination

Equal opportunities and equal treatment are a cornerstone of social sustainability at Heidemark. Therefore, discrimination, whether based on gender, age, religion, ethnicity, origin, disability, marital status, sexual orientation, political opinion, membership in a workers' organisation and trade union or other personal characteristics (e.g. skin colour), is inadmissible and must be avoided. Decisions on the type and manner of employment are made solely on the basis of the employee's abilities.

Labour contracts

Employees must be provided with a written employment contract where required by law. It is not permitted to withdraw or withhold personal identification documents of any kind from employees.

Remuneration

The remuneration of employees may not be below the statutory minimum wage or - in the case of collective bargaining - the collectively agreed minimum wage. Employees must be allowed to freely dispose of part of their remuneration and the respective statutory social benefits must be complied

with. Deductions from wages as a disciplinary measure are not permitted. Wages must be paid in a manner that is practical for the employees. Employees must be regularly informed of the composition of their remuneration in a form that they can understand.

Working hours

The working hours must comply with the applicable law or - in the case of collective bargaining - the applicable collective agreement. Work breaks must be granted in accordance with the applicable local law. Employees' working hours must be documented and remunerated in accordance with the applicable statutory provisions. Overtime must be voluntary or regulated by a contract or collective agreement. In addition, the prescribed rest periods between working hours (in accordance with local law) must be observed.

Disciplinary measures

All forms of harassment, infliction of physical or psychological harm, abuse and intimidation are prohibited. Only disciplinary measures that are in accordance with national laws and internationally recognised human rights will be tolerated. All employees are to be treated with dignity and respect.

Freedom of association

It is a firm condition that employees' freedom of association is recognised and respected. Employees may join or form employee representative organisations or trade unions of their choice in accordance with local law. Membership of such an association must not result in employees being favoured or disadvantaged.

Health and safety

The health and safety of employees in the workplace must not be jeopardised. It must be ensured that the working environment is safe and that health hazards are excluded as far as possible. Clean sanitary facilities, adequate lighting, ventilation and heating systems, sufficient drinking water and regular safety assessments, instructions and training are fundamental to this, as far as practicable. This also includes protection against fire, extreme heat or cold and toxic substances. Employees have the right to be absent from work in the event of illness (with appropriate proof). In addition, access to health care must not be denied. Where there are sources of danger, it must be ensured that employees are equipped with appropriate protection (e.g. protective clothing, hearing protection) when working. If dormitories are provided, hygienic and safe conditions must be ensured in accordance with the circumstances. If private or public security forces are commissioned or used, it must be ensured that their deployment does not violate environmental or human rights obligations.

Unlawful eviction and unlawful land confiscation

Land, forests and waters that are used to secure livelihoods may not be unlawfully taken from the persons concerned, nor may this area be unlawfully evicted. All parties involved are obliged to exclude this when acquiring, building on or otherwise utilising land, forests and waters in accordance with the applicable local law.

How we fulfil our due diligence obligations

We always comply with applicable laws for the protection of human rights and environmental standards, including the Supply Chain Due Diligence Act (LkSG). Where local law and international human rights are not aligned, we will act in accordance with the higher standard. We endeavour to meet our obligations on an ongoing basis by thoroughly fulfilling our due diligence obligations, consistently involving the relevant interest groups, communicating transparently and continuously improving our internal regulations and processes.

Supplier Code of Conduct (SCoC)

With our Supplier Code of Conduct (SCoC) for suppliers, co-packers, licencees and their upstream suppliers and other business partners, we formulate our binding expectations of those involved in our supply chain that they also commit to complying with the principles set out, implement appropriate processes to respect human rights and environmental standards and also pass on these expectations to their own suppliers. This also means that our suppliers should provide appropriate information on request about how they address the aforementioned principles and what processes and measures they have established to ensure the best possible compliance and counteract any undesirable developments.

How we identify, monitor, prioritise and counteract risks

As a company, we have the opportunity to strengthen the protection of human rights in a variety of ways. We are aware of the potential human rights and environmental risks that may be associated with our business activities. We consider it part of our duty of care to identify potential and actual adverse risks and impacts of our business activities on people and the environment in the value chain. We strive to regularly analyse, document and continuously monitor risks and their specific connection to our company through structured risk assessments of our supply chain. As a first step, in 2023 we began to carry out risk analyses in this regard with regard to human rights and environmental issues

for our group of companies and to implement a corresponding control process. In this way, we address the human rights and environmental due diligence obligations throughout the HEIDEMARK Group and take appropriate measures to counteract any risks that are identified.

How we implement measures for recognised risks

The results of the analysis of human rights and environmental risks and impacts are incorporated into relevant business processes, particularly in our supplier management, but also in other internal company processes.

If a specific risk is identified at a direct supplier (risk supplier), a defined, interdisciplinary team defines appropriate preventive measures for the individual case (e.g. supplier surveys, contractual assurances, audits, training, etc.). The aim is to protect the (potentially) affected stakeholder groups and to avoid or at least minimise adverse human rights and environmental impacts in advance.

How we deal with actual injuries

In cases in which an actual violation of human rights or a violation of an environmental obligation is identified or appears likely, the relevant facts are substantiated by the responsible team and appropriate and effective remedial measures - up to and including termination of the cooperation - are taken immediately in order to end the violation or minimise the extent of the violation as far as possible.

How we review the effectiveness of our measures

We continuously monitor the effectiveness of our due diligence compliance and make appropriate adjustments if we identify potential for optimisation. In this context, we review the effectiveness of our measures to prevent and mitigate adverse human rights or environmental impacts at least once a year, but also on an ad hoc basis.

We document the fulfilment of our due diligence obligations within the company in an appropriate manner on an ongoing basis. We also actively endeavour to compensate for negative impacts to which we have contributed through our business activities, whether directly or indirectly.

Anchoring risk management in our company

We have defined clear responsibilities for the fulfilment of and compliance with our human rights and environmental due diligence obligations.

In order to centralise the monitoring of our risk management, we have appointed a Human Rights Officer who reports directly to the Management Board. The Human Rights Officer is supported in the operational implementation of our human rights and environmental due diligence processes by a clearly defined interdisciplinary team. The team meets regularly, but also on an ad hoc basis, documents its work and is also responsible for the further development of the corresponding risk management and due diligence processes.

Our whistleblower system

We reject all forms of human rights violations. Appropriate and effective grievance management is therefore an important part of our due diligence processes in order to effectively prevent and remedy any potential adverse effects caused by our company and our business activities.

To this end, we have set up a corresponding whistleblower portal on our website www.heidemark.de, which gives internal and external stakeholders (e.g. employees, contractors, customers, local groups) worldwide and at any time the opportunity to submit reports, including on human rights issues and environmental violations. Reports can be submitted anonymously and in various languages.

The whistleblower system is a confidential communication channel. Access options are communicated proactively. All reported information and suspicions about possible human rights or environmental violations in accordance with the LkSG are processed as part of a transparent, balanced and predictable process for all parties involved.

Ahlhorn, 02.01.2024

The management of the HEIDEMARK Group

Christopher Kalvelage

Timo Macke

Thomas M. Henseler

Bernd Wiegmann

Nils Witt

Andreas Fragge