

# CODE OF CONDUCT



**COSUCRA™**

**BUILDING OUR FUTURE  
WITH NATURE**

# 1.

# INTRODUCTION



This Code of Conduct and Ethics defines all the **fundamental values and principles** that guide COSUCRA in its activities and operations.

Each member of COSUCRA (General Assembly, Board of Directors, Executive Committee, Management, Workers, Employees) and each third party acting on its behalf commit themselves to respect and apply them on a daily basis.

At COSUCRA, our mission is to contribute towards a **contemporary, healthy and sustainable food**, focusing on nature's benefits in easy-to-use **integrated solutions**. This mission is complemented by an ambition and values shared by all our employees.

Through the drafting and publication of this Code of Conduct, COSUCRA wishes to assure all its stakeholders of its **commitment** to the **principles and values of ethics and integrity** contained in this Code.

It should be noted that this Code cannot cover every possible situation that could arise but provides a framework for legal and ethical responsibilities. The content of the Code of Conduct and Ethics will be regularly reviewed to incorporate changes within and outside COSUCRA. The latest version of this Code is available internally on the COSUCRA intranet and externally on the COSUCRA website.



# 2.

## COSUCRA VALUES



At COSUCRA, our ambition is to **create, together, a sustainable future for all by sharing our talents with passion**. This ambition is supported by 3 core values formulated by our employees themselves:

### ➤ Fulfilment

- At COSUCRA, we believe working with passion and maintaining good humour in our working relationships is a guarantee for quality work.
- It is therefore essential for us to remain curious of current affairs and the events that surround us.

### ➤ The search for excellence

- We want to create solutions with safety, quality and efficiency in mind.
- As a player in an ever-changing industry, we need to be agile and adapt easily to change.
- Innovation through our initiative and our strength of proposal are part of our DNA.

### ➤ Knowing how to live together

- Each of us must foster team spirit through trust, respect and mutual support and promote communication through listening, recognition, transparency and fairness.

These values guide us in the socially responsible and ethical application of our activities. We expect **every employee to live them to the full in whatever capacity** they are employed.

In addition to human values, COSUCRA places great importance on sustainability, as reflected in its baseline **"Building our future with nature"** and its sustainability strategy based on **7 strong commitments for 2030**:

- 1.** Develop and offer healthy, reliable, high-quality products from sustainable agriculture (50% of supply by 2030)
- 2.** Reduce COSUCRA's carbon footprint by 50% by 2030 by improving process efficiency by 20% and limiting the use of fossil fuels to 50% of 2019's consumption
- 3.** Ensure a sustainable water management (30% less water in processes by 2030)
- 4.** Contribute significantly to training in agricultural and food production technologies and techniques
- 5.** Ensure maximum recovery of by-products and reduction of environmental impact on the neighborhood
- 6.** Develop a company where people can flourish. COSUCRA pays particular attention to the training of its staff in order to support their development needs at any stage of their career
- 7.** Improve biodiversity on all company sites and land

As these 7 commitments demonstrate, **we take into account the expectations of our stakeholders**, in particular our employees, local residents, raw material suppliers, customers, authorities and shareholders.



# 3.

## SAFETY OF PERSONS



We strive to **create a suitable, safe and collaborative working environment. The health, safety and well-being of our employees are of key importance.** This is why we are undertaking various actions to protect them. Not only that, we are developing a risk management system to meet prevention objectives in line with current legislation in all areas of occupational well-being. We are also drawing up plans that include actions to achieve targets for reducing accidents, avoiding occupational diseases and **improving working conditions for our employees.**

Management is responsible for informing, motivating and training employees and visitors to comply with health and safety policies. While it is everyone's personal responsibility to respect safety rules, it is also everyone's duty to promote a safety culture. Everyone is entitled to take immediate action if safety is at stake, regardless of their role or title. We share a **personal and professional commitment to protecting the safety and health of everyone** at our production sites and surrounding stakeholders.

# 4. FOOD SAFETY



Located upstream in the food value chain, we have an **impact on a wide variety of consumer food products**. We follow **rigorous quality procedures to produce ingredients** that our customers can rely on to produce food that is healthy, safe and meets consumer needs.

The stability of our processes ensures that the **ingredients leaving** our factories are always under control, in compliance with legislation and the specifications required by our customers.

Each employee is required to apply and respect the established quality system. At COSUCRA, our quality system is built according to the requirements of **HACCP** and is **certified** by the **AFSCA** and by the **FSSC22000** and **FCA standards** for all our factories.

# 5.

## SOCIAL AND ETHICAL RESPONSIBILITY



### 5.1. Ethics and respect for social laws

COSUCRA treats its employees and all persons acting on its behalf with the **highest ethical standards**.

We comply with the internationally recognised Ethical Trading Initiative (ETI) Code of Ethics.

Our Human Resources Management policy respects existing legislation and **ensures free choice of employment, freedom of association and collective bargaining**.

### 5.2. Human rights, fair/diverse recruitment and harassment

COSUCRA respects human rights as defined in the United Nations conventions and by the International Labour Organisation. This includes **equal opportunities for all, fair pay** and a **good work-life balance**. In order to guarantee this balance and to ensure that rest and holiday times are respected, COSUCRA has drawn up an internal charter on the **"right to disconnect"** which aims to regulate the use of professional digital tools.

COSUCRA **treats people with respect and dignity**, does not discriminate between individuals on the basis of their origin, skin colour, age, gender, sexual orientation, disability, religion, language, but instead **promotes diversity**.

We do not tolerate **any form of harsh or inhumane treatment**, harassment, intimidation, verbal and/or physical abuse. Similarly, we do not tolerate **any form of forced or abusive labour**, whether it be child labour or any form of labour involving human trafficking.

### 5.3. GDPR

COSUCRA **complies with all applicable data protection** laws when collecting, processing, storing or otherwise handling the personal data of any individual.

COSUCRA applies, among others, the General Data Protection Regulation (GDPR), formally known as Regulation EU 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data. This applies to both internal and external exchanges.

All data processing is carried out for a specific purpose only, in a **transparent and verifiable manner**. Maintaining a high level of data security in information processing, preventing unauthorised access or use is not only a task for the IT department but a daily focus for all members of COSUCRA and anyone acting on its behalf.

In this respect, COSUCRA does not allow the processing of personal data without a legitimate reason or, failing that, without the consent of the person concerned.





# 6. ENVIRONMENTAL IMPACT



COSUCRA considers the **natural environment to be the most important resource**. We are aware of its fragility and the importance of protecting it. Improving our environmental footprint is a key concern.

Environmental impact management is also integrated into our production processes.

To formalise our approach, our environmental management system is certified according to the **ISO 14001 standard: 2015**. **COSUCRA also adheres to the environmental charter of Fevia (Federation of Belgian food companies)**.

# 7.

## BUSINESS INTEGRITY



### 7.1. Law enforcement, fair competition

COSUCRA, its employees and business partners must comply with **all applicable laws and regulations** in the regions in which we operate. We must apply the highest standard where local regulations conflict with the Code of Conduct or other compliance policies.

COSUCRA competes in all its markets and regions in **full compliance with antitrust, competition and fair trading laws**. COSUCRA's employees and representatives, in particular those involved in marketing, sales and purchasing, shall ensure that prices are set independently and that they are never determined directly or indirectly with competitors. Nor will they allocate customers, regions or products between COSUCRA and its competitors in any way other than through fair competition. Partners must comply with all applicable fair competition and antitrust laws. They must not enter, directly or indirectly, into illegal agreements with their competitors, nor must they exchange sensitive market information, such as customer prices and segmentation strategies.

## 7.2. Anti-corruption, bribery

**No employee, officer or other person representing COSUCRA shall give, offer or receive a bribe** or other improper advantage for commercial or financial gain. Gifts, hospitality, sponsorships, privileges such as the use of company assets and donations are only possible with full transparency and following all the requirements of an approval procedure.

Similarly, business partners shall not engage in **any form of bribery or corruption** (including the giving of gifts and/or benefits that unduly influence COSUCRA employees or representatives). Business partners shall comply with any applicable legal framework in the countries of incorporation and operation, and (inter alia) with the United Nations Convention against Corruption.



## 7.3. Conflicts of interest

Each member of COSUCRA or any other person representing COSUCRA **shall avoid conflicts of interest** (personal interests or interests of a third party competing with those of COSUCRA) as far as possible. The line manager must be informed if a situation arises that could lead to a conflict of interest. An employee may not pursue **outside activities that interfere with their responsibilities** at COSUCRA, that could potentially damage COSUCRA's reputation or harm COSUCRA's interests.

## 7.4. Data privacy

Except when required by law, COSUCRA employees or consultants shall **not disclose confidential information**. They must also make every effort to avoid inadvertent disclosure by taking special care when storing or transmitting confidential information. Confidential information shared by customers or suppliers must be treated with the same care and under the same restrictions. Business partners must **exercise due care** when handling, discussing or transmitting sensitive or confidential information that could affect COSUCRA, its employees, customers, the business community or the public, and will comply with all applicable data privacy laws.

# 8.

## VIOLATION OF THE CODE OF CONDUCT



Any breach of the Code of Conduct and Ethics **must be reported to the line manager and/or Human Resources** so that appropriate action can be taken. The information collected will be treated as confidential.

**More specifically, if you witness or are confronted with inappropriate behaviour that involves:**

- ➔ **Social and ethical responsibility:** you can talk about this internally to your manager, the HR department and one of our trusted persons, or externally to a prevention adviser on Psychosocial Aspects from the ATTENTIA department and to the Prevention and Protection at Work department (SEPP).
- ➔ **Business integrity:** COSUCRA has put in place a «whistleblower» procedure (WP). This procedure is an integral part of the COSUCRA Group Warcoing SA Work Rules (Ethical Policy). It applies to all employees worldwide and aims to facilitate the collaboration of all in the fight against corruption at COSUCRA Group Warcoing SA. This procedure is also open to third parties.



[www.cosucra.com](http://www.cosucra.com)

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