

Jungbunzlauer

May 26, 2025

Jungbunzlauer Canada Inc. is a subsidiary of Jungbunzlauer Holding AG and as such falls under the management of the Corporate Headquarters. Jungbunzlauer Canada Inc produces Citric Acid and its associated products in Port Colborne, Ontario. Jungbunzlauer has committed to reducing the risk of Forced Labour and Child Labour through policies and training, along with the use of Third-Party assistance. The Executive Committee Report dated 05.03.2025 by Felix Matthies (Supplier Engagement Sustainability Manager) outlines the steps taken by Jungbunzlauer to address this issue. This has also been emphasized with the Modern Slavery and Human Trafficking Statement issued by the Bruno Tremblay (CEO) and Sara Merian (CFO) of Jungbunzlauer. There are also policies in place on the local intranet site that apply to all employee's of Jungbunzlauer including but not limited to the Corporate Social Responsibility Policy, the Jungbunzlauer Code of Conduct and the Jungbunzlauer Code of Business Conduct. Jungbunzlaulers Suppliers are also required to follow the Supplier Code of Conduct and are responsible for submitting a Supplier Questionnaire to our company every 3 years. The suppliers are verified with Supplier Audits and visits along with 3'd party audits such as QRC (TransCaer-Responsible Care). Training of all staff with a valid email address is conducted every 2 years and includes Compliance Basics, Social Compliance, Preventing Corruption and Responsible Exporting. The Attached are the documents supporting Jungbunzlauer's focus on curtailing and reducing the risks of Forced Labour and Child Labour.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year 2024.

- Mike Smith
- CFO
- Canadian Operations
- 05/26/25

Michael Smith

I have the authority to bind Jungbunzlauer Canada Inc.

- Ryan Doell
- CFO
- General Manager Canadian Operations
- 05/26/25

Ryan Doell

I have the authority to bind Jungbunzlauer Canada Inc.

Report

Jungbunzlauer

TO: Executive Committee
FROM: Felix Matthies
DATE: 05.03.2025
SUBJECT: Swiss due diligence and reporting obligations on conflict minerals and child labour for the year 2024

Executive summary

Jungbunzlauer is not in the scope of Swiss due diligence and reporting obligations in relation to minerals and metals from conflict-affected areas under the corresponding ordinance as Jungbunzlauer is neither placing in free circulation nor processing concerned minerals and metals in Switzerland.

Jungbunzlauer is not exempted from checking whether there are reasonable grounds to suspect child labour in its value chain under the corresponding ordinance as it does not meet the criteria of a small and medium sized enterprise or of a low-risk undertaking.

We have thus checked whether there are reasonable grounds to suspect child labour in the manufacturing of products purchased by Jungbunzlauer in a risk-based approach and according to the best effort principle.

146 manufacturing sites supplying products to Jungbunzlauer have been identified in countries rated as “enhanced” by UNICEF, i.e. with a significant risk of child labour, and have been scanned with the EiQ Sentinel adverse media screening tool from LRQA ELEVATE.

As NO media controversies relating to child labour have been found in this scan, Jungbunzlauer has not identified any reasonable grounds to suspect child labour in the sites having manufactured the products it purchases.

According to Art. 5 of the DDTrO, Jungbunzlauer shall document this finding (done with this report) and shall be exempt from the due diligence and reporting obligations in relation to child labour.

Scope of application

According to the Ordinance of 3 December 2021 on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (“DDTrO”) of the Swiss Code of Obligations from The Swiss Federal Council, based on Articles 964j paragraphs 2–4 and 964k paragraph 4 of the Code of Obligations (CO), companies whose registered office, head office or principal place of business is located in Switzerland must comply with due diligence obligations in the supply chain and report on this if they:

- transfer tin, tantalum, tungsten or gold minerals or metals in a certain minimum quantity from conflict and high-risk areas into free circulation in Switzerland or process them in Switzerland; or
- offer products or services that are reasonably suspected of being manufactured or provided using child labour.

For minerals and metals from conflict areas, Jungbunzlauer does not fall under the due diligence requirements as we are neither placing in free circulation nor processing concerned minerals and metals in Switzerland.

For child labour, the Swiss Federal Council has set out an exemption for low-risk undertakings. According to Art. 7 of the DDTro, a low risk in relation to child labour is assumed if a company operating in countries whose due diligence response is rated as "basic" by UNICEF in its Children's Rights in the Workplace Index¹:

- a. purchases or manufactures products in accordance with the indication of origin;
- b. primarily procures or provides services.

Jungbunzlauer manufactures products only in countries whose due diligence response is rated as "basic" by UNICEF in its Children's Rights in the Workplace Index, i.e. with a low risk of child labour.

Prior to verification we knew that Jungbunzlauer purchases products mainly made in countries rated as "basic" by UNICEF, but also some made in countries rated as "enhanced" by UNICEF, i.e. with a significant risk of child labour. Therefore, Jungbunzlauer does not meet the criteria of a low risk undertaking.

Prior to verification we did not know if Jungbunzlauer would also purchase products in countries rated as "heightened" by UNICEF, i.e. with a very significant risk of child labour.

In compliance with Art. 5 of the DDTro, Jungbunzlauer has thus checked whether there are reasonable grounds to suspect child labour in the manufacturing of products that we purchase.

Verification process for evaluating the risk of child labour

To check if manufacturers of products purchased by Jungbunzlauer eventually present a risk of child labour, Jungbunzlauer has defined to apply the following principles:

- Origin based ("made in"): when we know the country of origin of a purchased product, its manufacturer is categorised according to the risk level of the country where he is located. When we do not know the country of origin of a purchased product, we strive to identify it as well as the name and address of the manufacturer. When a product is supplied to us by a distributor or by a subsidiary of an international group located in a "basic" country (direct supplier), but the manufacturing takes place in a different country, we strive to identify the name and full address of the manufacturer (original supplier).
- Limitation to products purchased by Jungbunzlauer: our due diligence obligation is limited to the origin of the products that we purchase. The due diligence obligation for the origin of the products used to manufacture the products that we purchase falls in the scope of responsibility of the manufacturer of the products that we purchase.
- Risk based approach: When the product received originates in a country rated as "basic" (51 countries with a low risk of child labour), the manufacturer is excluded from the scope of verification. When the product received originates in a country rated as "enhanced" (133 countries with a significant risk of child labour) or "heightened" (11 countries with a very significant risk of child labour), the manufacturer is included in the scope of verification.
- Best effort: Asking the manufacturer to confirm the absence of child labour in his company or to fill a questionnaire would not be considered best effort. To minimize the risk that publicly available information on the involvement of a company in child labour is not identified, we scan manufacturers of products located in "enhanced" or "heightened" countries with a professional media controversy scanning tool from a third party.

¹ Available at: <https://www.unicef.ch/en/what-we-do/national/partners-and-initiatives/childrens-rights-and-business>

Verifications performed in 2024 to evaluate the risk of child labour have been primarily focused on direct production inputs (raw materials, energies, chemicals, packaging materials). Indirect production inputs like production equipment and spare parts have also been considered when country of origin was known. Small spend items like tools and consumables for maintenance, laboratory and offices have not been considered.

As Jungbunzlauer’s production sites are all located in “basic” countries and purchase the products needed for manufacturing our products mainly locally, i.e. within the country of the production site or in surrounding countries, most of which are also “basic”, the vast majority of the products purchased by Jungbunzlauer are manufactured in “basic” countries and are considered low risk. A main exception to this rule of thumb is the USA which is the country of origin of different products purchased by Jungbunzlauer, mainly in Canada, but also in Europe, and which is rated as “enhanced” for child labour by the UNICEF.

The sustainability team and the purchasing team have worked together in 2025 to identify products originating in “enhanced” or “heightened” countries, based on Jungbunzlauer’s purchasing data in SAP for the full year 2024, and supplier and product knowledge of the purchasing team.

We have not identified any product purchased by Jungbunzlauer that would originate from one of the 11 countries rated as “heightened” for child labour by UNICEF.

We have identified 146 manufacturing sites located in “enhanced” countries (list annexed to this report) that deliver us products or may do so when a qualified product can originate from several manufacturing sites. 68% of these manufacturing sites are in the USA. 14% are in China. 5 % are in India, 3% are in Turkey and Bulgaria. The remaining 7% are distributed over Argentina, Bosnia and Herzegovina, Brazil, Malaysia, Peru, the Philippines, Thailand and Ukraine. From a product perspective, 54% of these manufacturing sites supply us with equipment and spare parts, 36% with chemicals, 7% with packaging materials and 3% with raw materials.

To provide best effort, we have mandated LRQA ELEVATE, a leading global assessment and inspection expert conducting over 25’000 social compliance audits per year, to scan these manufacturing sites with their EiQ Sentinel adverse media screening tool for the last 8 years.

Scanning process with LRQA’s ELEVATE EiQ Sentinel screening tool:



The scan was performed in February 2025 for the period of December 2017 to February 2025, covering the whole year of 2024. The result was 0 media controversies relating to child labour for the 146 manufacturing sites located in “enhanced” countries. Therefore, Jungbunzlauer has not identified any reasonable grounds to suspect child labour in the sites having manufactured the products it purchases.

According to Art. 5 of the DDTro, Jungbunzlauer shall document this finding (done with this report) and shall be exempt from the due diligence and reporting obligations in relation to child labour. We can however report voluntarily our findings in our annual Corporate Sustainability Report (recommendation) and in our Modern Slavery Statement (done).

Jungbunzlauer

List of countries / EUC

Valid since

15.09.2023

- Algeria
- Armenia
- Azerbaidzhan
- Belarus
- Central African Republic
- Congo
- Irac
- Iran
- Israel
- Jordan
- Lebanon
- Libya
- Myanmar (Burma)
- North Korea
- Pakistan
- Russia
- Zimbabwe
- Somalia
- Sudan
- Republic of South Sudan
- Syria
- Venezuela

To whom it may concern

Jungbunzlauer

Basel, 25 March 2025

Modern Slavery and Human Trafficking Statement of Jungbunzlauer Group for 2024

This statement is made pursuant to the UK Modern Slavery Act 2015, the California Transparency in Supply Chains Act 2015, the Australian Modern Slavery Act 2018, the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour 2021 (DDTrO) and the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 (S-211).

It explains our efforts to identify, assess and manage the risks of modern slavery, including forced labour and child labour, and human trafficking within our business and our supply chain.

This statement has been approved by the Jungbunzlauer Board of Directors on 25 March 2025.

Our Business

Jungbunzlauer is one of the world's leading producers of biodegradable ingredients of natural origin for food & beverages, nutrition & health, personal & household care, and various industrial applications.

Headquartered in Switzerland, we take pride in the quality and supply reliability of our acidulant, texturant and specialty ingredient products manufactured in our four plants in Austria, Canada, France, and Germany. We serve customers in more than 130 countries and generate CHF >1 billion in revenues.

Our vision "From nature to ingredients®" commits us to the protection of people and their environment. We strive to fulfil our vision by relying on our values as the basis of everything that we do.

We aim to operate our business according to highest ethical, social and environmental standards. We have integrated a framework of principles, guidelines and policies that is communicated and available to all employees.

Our Commitment

Jungbunzlauer prohibits any form of modern slavery and human trafficking within its organisation and supply chains.

Our Human Rights Policy states our commitment to free choice of employment and to compliance with national labour laws, the Universal Declaration of Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and the UN Convention on the Rights of the Child.

Our Supplier Code of Conduct explains our requirement for our suppliers to comply with the UN Global Compact's Ten Principles in the areas of human rights, labour, environment and anti-corruption. The principles 4 and 5 are respectively for the elimination of all forms of forced and compulsory labour and for the effective abolition of child labour.

Assessment of Own Operations and Upstream Supply Chain

Jungbunzlauer's own production sites are all located in countries rated as "basic" by UNICEF in its Children's Rights in the Workplace Index ("CRWI"), i.e. with a low risk of child labour. Our production sites participate in the Supplier Ethical Data Exchange ("SEDEX") ESG rating platform with the aim to track social and ethical performance, and to drive improvements in responsible business practices. A core principle of SEDEX is to avoid unfair and unsafe labour practices including modern slavery and human trafficking. The SEDEX Self-Assessment Questionnaire ("SAQ") is updated at least once a year for each production site. Each production site is also checked every two years by an external auditor using the SEDEX Members Ethical Trade Audit ("SMETA") process. The findings are closely monitored, and non-compliance rapidly remediated through appropriate corrective actions.

Jungbunzlauer recognises the human rights risks inherent in global sourcing. As a large-scale ingredients producer with a manufacturing footprint in the European Union and Canada, we source goods needed to manufacture our products mainly locally, i.e. within the country of our production site or in surrounding countries. Our residual risks in relation to modern slavery and human trafficking are at our limited number of suppliers manufacturing goods outside of these regions. We strive to select our suppliers carefully and make them aware of our Supplier Code of Conduct prior to engagement. For goods purchased by our production sites manufactured in countries rated as "enhanced" or "heightened" by UNICEF in its CRWI, i.e. with a higher risk of child labour, we conducted an assessment using an adverse media screening tool to determine whether there are reasonable grounds to suspect child labour in the manufacturing of these goods in a risk-based approach and according to the best effort principle. Furthermore, we assessed additional suppliers with the same tool on a number of ESG risks, including forced labour and human trafficking. We concluded that there are no reasonable grounds to suspect child labor, forced labour or human trafficking in the production sites of the goods sourced by Jungbunzlauer, and that we are therefore exempt from further due diligence and reporting obligations in accordance with Art. 5 para. 2 of the DDTrO.

We do not import or process gold, tin, tungsten or tantalum in quantities exceeding the thresholds specified in the DDTrO. We therefore concluded that we are exempt from further due diligence and reporting obligations in relation to Minerals and Metals from Conflict-Affected Areas.

Trainings

All relevant employees of Jungbunzlauer undergo a compliance training program in their first year of employment and a refresher compliance training program every two years thereafter. The program includes trainings on compliance basics, social compliance and whistleblowing.

Raising Grievances

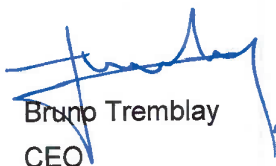
Jungbunzlauer takes all reports of potential misconduct very seriously, and we have established a transparent and fair process to deal with any concern or complaint.

We encourage our employees and external stakeholders to inform us of possible ethical or legal violations, and we commit to investigate thoroughly any arising issue and to solve it. If feeling uncomfortable with transparent reporting, our employees can also communicate any identified or suspected misconduct anonymously via our third-party whistleblowing system.

Our managers and executive boards must report to the CEO when any such complaint or concern is being raised, or at least once a year on the overall situation regarding such issues. Reports of potential misconduct of the CEO must be directed to the Chair of the Board. The CEO provides the Board of Directors with a summary report on the observance of such issues that may have arisen.

Conclusion

Jungbunzlauer is committed to preventing modern slavery and human trafficking in all its forms, and we will continue to work diligently to prevent any misconduct relating to modern slavery or human trafficking in our own operations and in our upstream supply chain.



Bruno Tremblay
CEO



Sara Merian
CFO

Corporate Social Responsibility Policy Jungbunzlauer Group

Labour Standards

All Jungbunzlauer personnel is employed in compliance with respective national labour laws. Jungbunzlauer fully respects the rules of conduct stated in the International Labour Organization's (ILO) Fundamental Conventions as well as the Universal Declaration of Human Rights.

The following standards apply:

A. Residence and Work Permits

All employees are in possession of a residence and work permit according to national law.

B. Employment Contracts

All employees have a written employment contract which complies with the legal and collective contractual regulations of the place of employment.

Special conditions granted at the moment of employment under particular circumstances are justified and documented in writing and are immediately adjusted to the company's standard payment model. Wages may differ from this payment model, especially for reasons of motivation and as a reward for special achievements, but are justified and documented in writing.

C. Responsibility to Employees

Employment is freely chosen. There is no forced or compulsory labour and workers are free to leave their employer after reasonable notice.

All Jungbunzlauer companies are in compliance with the ILO conventions on child labour and the UN Convention on the Rights of the Child.

Discrimination due to personal characteristics such as gender, religion, race, etc. is not allowed. This ban on discrimination refers to recruitment, payment of wages, attribution of work, promotion and dismissal (in the event of a personnel cut for internal reasons).

All personnel are treated with dignity and respect. Jungbunzlauer does not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of personnel. No harsh or inhumane treatment is allowed.

All personnel have the right to form, join, and organise trade unions of their choice and to bargain collectively. Where this is restricted under law, the employer should facilitate alternative means for independent and free association and bargaining.

D. Health and Safety Conditions

Jungbunzlauer provides a safe, healthy and hygienic workplace environment and takes effective steps to prevent potential accidents and injury to workers' health.

A system has been established to detect, avoid, or respond to potential threats to the health and safety of personnel.

Jungbunzlauer provides appropriate personal protective equipment to employees. In the event of a work related injury Jungbunzlauer provides first aid and assists the worker in obtaining follow-up medical treatment.

Health and safety measures are communicated to employees and responsibilities are clearly defined.

Training of all relevant employees on health and safety risks and good working practices are performed.

Jungbunzlauer's production plants adhere to the Responsible Care programme to improve health, safety, and environmental performance.

An Health, Safety, Environmental and Sustainability Policy has been issued by the Management Committee.

E. Implementation

The observance of the above guidelines is the responsibility of the management of each Jungbunzlauer company. The companies' managers and executive boards immediately report to the CEO if any problems or non-compliance with these guidelines arise.

Code of Business Conduct

At Jungbunzlauer, we aim to operate our business according to highest ethical, social and environmental standards. We have integrated a framework of principles, guidelines and policies that is communicated and available to all employees. The way we work is defined and characterized by applying these standards which we see as enablers to be a responsible and sustainable business partner.

Full compliance with local laws and local regulations is imperative and precondition to any and all business transactions. This includes, but is not limited to, compliance with regulation on financial accounting and reporting, competition law, employment law, anti-corruption regulation, export control and trade restrictions. Jungbunzlauer is committed to meeting its customers' and stakeholders' expectations that we supply high quality products which are sourced and manufactured in a fair, ethical and environmentally responsible way.

The following standards apply:

A. Conflict of Interest

Jungbunzlauer employees are not allowed to perform services in competition with Jungbunzlauer, nor are they allowed to work as an employee, consultant, officer, or member of the board of directors of a company competing with Jungbunzlauer.

Jungbunzlauer employees are not allowed to be a supplier to Jungbunzlauer or work for a potential customer or supplier while employed by Jungbunzlauer, nor are they allowed to accept money or any benefit from a customer or supplier or potential customer or potential supplier for advice or services that relate to the customer's or the supplier's business with Jungbunzlauer.

Jungbunzlauer employees who hold a position where they have influence or control over the employment, dismissal, job content, job evaluation or compensation of any employee who is a relative or a personal friend or who is related to any such persons, must refrain from exerting such influence, and always refer such matters to an independent superior.

B. Bribery and Corruption

Jungbunzlauer employees are not allowed to engage in bribery, extortion or kick-backs, whether to public officials or to private persons who are related to or may influence Jungbunzlauer's business or business opportunities, nor are they allowed to receive or demand any payment for themselves or their relatives or affiliates from government officials or from Jungbunzlauer's business partners or prospective business partners.

Accordingly, Jungbunzlauer's funds must not be used by employees to make payments, directly or indirectly (through intermediaries, such as partners, agents, distributors, service providers, consultants, family members, or otherwise), in money, property, services or any other form to a government official, political party, candidate for political office, or to any privately employed or engaged person to induce the recipient to 1) exert influence to assist the Company in obtaining or retaining business; or 2) commit any act in violation of a lawful duty.

C. Gifts and Entertainment

All transactions with customers and suppliers are impartial, objective, and free from outside influence.

Jungbunzlauer has issued clear rules on exchanging gifts and entertainment. All expenses for gifts, entertainment and hospitality must be accurately registered in the expense accounts.

Jungbunzlauer employees must also report the receiving of gifts to their manager.

D. Money Laundering

Jungbunzlauer supports anti-money laundering laws and policies and does not condone, facilitate or support money laundering in any form and has established procedures to avoid receipt of cash or cash equivalents that are the proceeds of crime.

E. Facilitation Payments

Jungbunzlauer prohibits the use of illegal facilitation payments and to eliminate them from all business practises.

F. Financial Statements and Accounting

Jungbunzlauer has established internal procedures and controls to ensure the consistency and accuracy of its accounting.

Jungbunzlauer employees are obliged to act in accordance with corresponding compliance objectives by disclosing all information that is relevant for accounting and financial reporting and auditing purposes to the relevant staff. This may include reporting of suspected fraud or other irregularities conducted by any employee or by any other person.

G. Competition and Antitrust

Jungbunzlauer is committed to dealing fairly with customers, suppliers and competitors. We do not engage in anti-competitive sales practices, unfairly limit trade or attempt to exclude competitors from the marketplace. This means that while we compete vigorously, we act independently and in our own interest in all commercial situations affecting competitive conditions of trade and avoid practices that restrict competition.

Therefore, Jungbunzlauer's employees must, amongst others:

- never enter into any agreement or tacit understanding with competitors, such as on allocation of customers, sales territories or categories of products, coordination of bids or limitation of capacity
- avoid discussing competitive issues with competitors, such as on the price or other terms on which Jungbunzlauer or its competitors sell products and services, the customers to whom, or territories in which, Jungbunzlauer or its competitors sell products and services
- respect supplier's and customers' freedom to conduct their business as they see fit
- refrain from using any market power or market information in a way which may restrict competition
- avoid any use of coercion in the sale of products to customers, such as forcing a customer to purchase unwanted products, tying in or bundling
- not practise "predatory pricing" – i.e. selling products and services below cost to eliminate or harm competitors or
- refrain from unjustifiable criticism of a competitor's products or services or use deceptive advertising.

When Jungbunzlauer employees participate in trade or industry association functions, fairs and conferences, they must be careful not to exchange confidential data with competitors. Should any confidential data be improperly disclosed by a competitor, Jungbunzlauer employees must leave the meeting and have their departure recorded in the meeting minutes.

H. Trade Restrictions, Export Control and “Anti-Boycott” Laws

Jungbunzlauer employees shall be aware that it may be illegal to sell a product to another party in circumstances where Jungbunzlauer either knows or has reason to believe that the products will ultimately be shipped to a country or entity subject to trade restrictions.

Jungbunzlauer Group companies are generally prohibited from complying with unilateral customer requests supporting restrictive trade practices, including boycotts against specified countries or against certain organisations or persons.

Jungbunzlauer employees shall contact their direct manager or a member of the Management Committee, if they are not comfortable conducting business with a particular entity or person not referenced by Jungbunzlauer’s Management Committee.

I. Market Intelligence

Jungbunzlauer employees do not gather or use non-public information about competitors which is proprietary or confidential, no matter how obtained, and this type of information is not used to benefit Jungbunzlauer in any way.

Jungbunzlauer does not actively seek a third party’s confidential information or accept the receipt of confidential information without the owner’s consent.

Jungbunzlauer employees are not allowed to bring to or use any confidential information, including digital records, from their prior employers who compete with Jungbunzlauer or who are customers of Jungbunzlauer.

Jungbunzlauer employees are not allowed to use copyrighted materials or third-party trademarks (for example portions of audio, video and off-the-internet or off-the-air recordings) in material they are producing (including internet or intranet web sites) without specific permission from the copyright owner.

J. Data Protection

Jungbunzlauer acknowledges and respects that according to many applicable data protection laws, in particular the General Data Protection Regulation (GDPR), the use of personal data is prohibited, unless a statutory requirement, the performance of a contract, the consent of the person concerned or a legitimate interest of Jungbunzlauer require or allow it.

Jungbunzlauer has implemented several global data protection policies in order to define and implement uniform standards. All employees, contractors and executives at any Jungbunzlauer Group company are obliged to comply with these policies.

K. Intellectual Property Rights

Jungbunzlauer employees maintain the confidentiality, integrity and proprietary nature of all confidential information and intellectual property rights.

Jungbunzlauer respects third parties’ proprietary information and intellectual property rights and does not make any illegal use thereof or otherwise infringe thereon.

Unauthorised use of confidential information and/or intellectual property rights is reported to the Management.

L. Government Relations

Jungbunzlauer representatives conduct themselves according to the highest ethical standards in all our dealings with governments and their agencies.

Although dealing with governmental agencies in the ordinary course of our business, Jungbunzlauer does not participate in party political activity.

M. Reporting Violations

Jungbunzlauer encourages employees and external parties to inform the company of possible ethical or legal violations, in order to make it possible to investigate the issues, and to solve them. The reported issues are investigated with consideration, minimising damage to any innocent parties. Key target in any investigation is to stop any wrongful actions.

In general, it is suggested that any problems noted or suspected by the informers handled with the units, departments, or persons in charge of said issues, to ensure efficiency in handling of the issues. In cases where the informer does not want to contact the person in charge of the current issue, it is possible to contact the HR department, the senior management or the board of directors.

N. Implementation

The observance of the above guidelines is the responsibility of the management of each Jungbunzlauer company. The companies' managers and executive boards immediately report to the CEO if any problems or non-compliance with these guidelines arise.

Products and Service

Jungbunzlauer is committed to providing an overall positive experience to its customers, and establishing itself as a trustworthy, reliable, and professional partner. Jungbunzlauer is therefore committed to providing its customers with quality products, services and support which meet customer expectations, contract specifications, industry standards and relevant statutory requirements.

Jungbunzlauer offers safe products in line with our implemented product safety and HACCP (Hazard Analysis Critical Control Point) procedures. Packaging, labelling and documentation comply with the stringent European and North American legal requirements. All Jungbunzlauer sites are certified according to the requirements and guidelines of ISO 9001 quality management system and FSSC 22000 food safety management system.

The following standards apply:

A. Rules to Observe

- Observance of the legal regulations on chemicals and foods, relevant legislations and codices, such as pharmacopoeias, specifications and standards on food additives, Codex Alimentarius, REACH (Registration, Evaluation, Authorisation and Restriction of Chemicals) etc.
- Assurance of product safety according to the product liability law (supervision of product ranges and recall, where necessary).
- Observance of declaration obligations according to the local law (product compound description, toxic classes, instructions for use, origin, date of production and validity, etc.).
- Observance of the applied quality standards, such as ISO 9001, FSSC 22000, etc.

B. Implementation

The observance of quality standards must be ensured by the Corporate Quality Manager, who reports to the Vice President Manufacturing & Technology. The observance of Jungbunzlauer product relevant laws on chemicals and foods must be ensured by the Technical Service Managers, who report to the Product Management.

This policy has been issued by the Management Committee and by all Jungbunzlauer companies. Compliance with these policy guidelines shall be regularly audited but at least every five years or when required.

To Whom It May Concern

Jungbunzlauer

Basel, 1st May 2022

Jungbunzlauer's Code of Conduct

Dear Customers and Business Partners

At Jungbunzlauer, we aim to operate our business according to highest ethical, social and environmental standards. We have integrated a framework of principles, guidelines and policies that is communicated and available to all employees. The way we work is defined and characterized by applying these standards which we see as enablers to be a responsible and sustainable business partner.

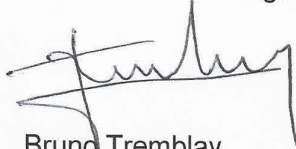
Full compliance with local laws and local regulations is imperative and precondition to any and all business transactions. This includes, but is not limited to, compliance with regulation on financial accounting and reporting, competition law, employment law, anti-corruption regulation, export control and trade restrictions. Jungbunzlauer also has a zero tolerance business policy for land-grabbing.

Jungbunzlauer is committed to ensure a fair business environment. Engagement in anti-competitive sales practices, unfair trade limitations or attempts to restrict the competitive landscape are prohibited. It is fundamental to Jungbunzlauer that engagement in bribery, facilitation payments, extortion or kick-backs is not tolerated for any business transaction. Jungbunzlauer supports anti-money laundering laws and policies and will not condone, facilitate or support money laundering in any form and has established procedures to avoid receipt of cash or cash equivalents that are the proceeds of crime.

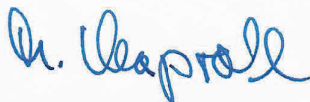
Jungbunzlauer expects that its customers and business partners act in the same way as we do and that they have procedures in place to investigate inappropriate behaviour.

Therefore, we kindly ask you to read our Code of Conduct carefully and sign the Declaration of Consent at the end of this document.

Thanks and best regards



Bruno Tremblay
CEO



Michael Klapproth
CFO

Jungbunzlauer's Code of Conduct

A. Conflict of Interest

Jungbunzlauer employees are not allowed to perform services in competition with Jungbunzlauer, nor are they allowed to work as an employee, consultant, officer, or member of the board of directors of a company competing with Jungbunzlauer.

Jungbunzlauer employees are not allowed to be a supplier to Jungbunzlauer or work for a potential customer or supplier while employed by Jungbunzlauer, nor are they allowed to accept money or any benefit from a customer or supplier or potential customer or potential supplier for advice or services that relate to the customer's or the supplier's business with Jungbunzlauer.

Jungbunzlauer employees who hold a position where they have influence or control over the employment, dismissal, job content, job evaluation or compensation of any employee who is a relative or a personal friend or who is related to any such persons, must refrain from exerting such influence, and always refer such matters to an independent superior.

B. Bribery and Corruption

Jungbunzlauer employees are not allowed to engage in bribery, extortion or kick-backs, whether to public officials or to private persons who are related to or may influence Jungbunzlauer's business or business opportunities, nor are they allowed to receive or demand any payment for themselves or their relatives or affiliates from government officials or from Jungbunzlauer's business partners or prospective business partners.

Accordingly, Jungbunzlauer's funds must not be used by employees to make payments, directly or indirectly (through intermediaries, such as partners, agents, distributors, service providers, consultants, family members, or otherwise), in money, property, services or any other form to a government official, political party, candidate for political office, or to any privately employed or engaged person to induce the recipient to 1) exert influence to assist the Company in obtaining or retaining business; or 2) commit any act in violation of a lawful duty.

C. Gifts and Entertainment

All transactions with customers and suppliers are impartial, objective, and free from outside influence.

Jungbunzlauer has issued clear rules on exchanging gifts and entertainment. All expenses for gifts, entertainment and hospitality must be accurately registered in the expense accounts.

Jungbunzlauer employees must also report the receiving of gifts to their manager.

D. Money Laundering

Jungbunzlauer supports anti-money laundering laws and policies and does not condone, facilitate or support money laundering in any form and has established procedures to avoid receipt of cash or cash equivalents that are the proceeds of crime.

E. Facilitation Payments

Jungbunzlauer prohibits the use of illegal facilitation payments and to eliminate them from all business practises.

F. Financial Statements and Accounting

Jungbunzlauer has established internal procedures and controls to ensure the consistency and accuracy of its accounting.

Jungbunzlauer employees are obliged to act in accordance with corresponding compliance objectives by disclosing all information that is relevant for accounting and financial reporting and auditing purposes to the relevant staff. This may include reporting of suspected fraud or other irregularities conducted by any employee or by any other person.

Jungbunzlauer's Code of Conduct

G. Competition and Antitrust

Jungbunzlauer is committed to dealing fairly with customers, suppliers and competitors. We do not engage in anti-competitive sales practices, unfairly limit trade or attempt to exclude competitors from the marketplace. This means that while we compete vigorously, we act independently and in our own interest in all commercial situations affecting competitive conditions of trade and avoid practices that restrict competition.

Therefore, Jungbunzlauer's employees must, amongst others:

- never enter into any agreement or tacit understanding with competitors, such as on allocation of customers, sales territories or categories of products, coordination of bids or limitation of capacity
- avoid discussing competitive issues with competitors, such as on the price or other terms on which Jungbunzlauer or its competitors sell products and services, the customers to whom, or territories in which, Jungbunzlauer or its competitors sell products and services
- respect supplier's and customers' freedom to conduct their business as they see fit
- refrain from using any market power or market information in a way which may restrict competition
- avoid any use of coercion in the sale of products to customers, such as forcing a customer to purchase unwanted products, tying in or bundling
- not practise "predatory pricing" – i.e. selling products and services below cost to eliminate or harm competitors or
- refrain from unjustifiable criticism of a competitor's products or services or use deceptive advertising.

When Jungbunzlauer employees participate in trade or industry association functions, fairs and conferences, they must be careful not to exchange confidential data with competitors. Should any confidential data be improperly disclosed by a competitor, Jungbunzlauer employees must leave the meeting and have their departure recorded in the meeting minutes.

H. Trade Restrictions, Export Control and "Anti-Boycott" Laws

Jungbunzlauer employees shall be aware that it may be illegal to sell a product to another party in circumstances where Jungbunzlauer either knows or has reason to believe that the products will ultimately be shipped to a country or entity subject to trade restrictions.

Jungbunzlauer Group companies are generally prohibited from complying with unilateral customer requests supporting restrictive trade practices, including boycotts against specified countries or against certain organisations or persons.

Jungbunzlauer employees shall contact their direct manager or a member of the Management Committee, if they are not comfortable conducting business with a particular entity or person not referenced by Jungbunzlauer's Management Committee.

I. Market Intelligence

Jungbunzlauer employees do not gather or use non-public information about competitors which is proprietary or confidential, no matter how obtained, and this type of information is not used to benefit Jungbunzlauer in any way.

Jungbunzlauer does not actively seek a third party's confidential information or accept the receipt of confidential information without the owner's consent.

Jungbunzlauer employees are not allowed to bring to or use any confidential information, including digital records, from their prior employers who compete with Jungbunzlauer or who are customers of Jungbunzlauer.

Jungbunzlauer employees are not allowed to use copyrighted materials or third-party trademarks (for example portions of audio, video and off-the-internet or off-the-air recordings) in material they are producing (including internet or intranet web sites) without specific permission from the copyright owner.

Jungbunzlauer's Code of Conduct

J. Data Protection

Jungbunzlauer acknowledges and respects that according to many applicable data protection laws, in particular the General Data Protection Regulation (GDPR), the use of personal data is prohibited, unless a statutory requirement, the performance of a contract, the consent of the person concerned or a legitimate interest of Jungbunzlauer require or allow it.

Jungbunzlauer has implemented several global data protection policies in order to define and implement uniform standards. All employees, contractors and executives at any Jungbunzlauer Group company are obliged to comply with these policies.

K. Intellectual Property Rights

Jungbunzlauer employees maintain the confidentiality, integrity and proprietary nature of all confidential information and intellectual property rights.

Jungbunzlauer respects third parties' proprietary information and intellectual property rights and does not make any illegal use thereof or otherwise infringe thereon.

Unauthorised use of confidential information and/or intellectual property rights is reported to the Management.

L. Government Relations

Jungbunzlauer representatives conduct themselves according to the highest ethical standards in all our dealings with governments and their agencies.

Although dealing with governmental agencies in the ordinary course of our business, Jungbunzlauer does not participate in party political activity.

Declaration of Consent with Jungbunzlauer's Code of Conduct

We, the below mentioned company, hereby assure that we have read & understood Jungbunzlauer's Code of Conduct, and that we are in compliance with all requirements laid down in this document.

Company name and address:

Date and signature:

Name and position:

To our Suppliers

Jungbunzlauer

Basel, 1st May 2022

Jungbunzlauer Supplier Code of Conduct

Dear Suppliers

At Jungbunzlauer, we aim to operate our business according to highest ethical, social and environmental standards. We have integrated a framework of principles, guidelines and policies that is communicated and available to all employees. The way we work is defined and characterized by applying these standards which we see as enablers to be a responsible and sustainable business partner.

Full compliance with local laws and local regulations is imperative and precondition to any and all business transactions. This includes, but is not limited to, compliance with regulation on financial accounting and reporting, competition law, employment law, anti-corruption regulation, export control and trade restrictions. Jungbunzlauer also has a zero tolerance business policy for land-grabbing.

All Jungbunzlauer personnel is employed in compliance with respective national labour laws. Jungbunzlauer fully respects the rules of conduct stated in the International Labour Organization's Fundamental Conventions as well as the Universal Declaration of Human Rights.

We expect all suppliers to understand the importance and relevance of this policy and to conduct their business accordingly. In addition, our suppliers have to be in compliance with the Ten Principles of the UN Global Compact as a minimum.

Please find the listing of the Ten Principles of the UN Global Compact on the following page.

Best regards



Bruno Tremblay
CEO



Michael Klapproth
CFO

Jungbunzlauer Supplier Code of Conduct

The Ten Principles

The UN Global Compact's ten principles in the areas of human rights, labour, the environment and anti-corruption enjoy universal consensus and are derived from:

- The Universal Declaration of Human Rights
- The International Labour Organization's Declaration on Fundamental Principles and Rights at Work
- The Rio Declaration on Environment and Development
- The United Nations Convention Against Corruption

The UN Global Compact asks companies to embrace, support and enact, within their sphere of influence, a set of core values in the areas of human rights, labour standards, the environment and anti-corruption:

Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

Labour

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

Supplier Questionnaire Legal, Ethical and Social Commitments

At Jungbunzlauer we strive to provide our customers with products that meet today's market demands on legal-, ethical- and social correctness among the whole supply chain.

In order to achieve this goal, we need to carefully select our partners and understand our suppliers status of compliance with legal obligations, and their commitments to the International Labour Organization (ILO)¹⁾ convention text and the principles of Social Accountability 8000 (SA 8000) Standard²⁾.

Furthermore, Jungbunzlauer has integrated sustainability into its business activities.

Therefore, we kindly ask you to answer the questions in the table below.
Please fill in the fields open for lettering on your computer, print the form, sign it manually and return it by mail to the appropriate address indicated at the end of this letter.

Thank you for your efforts and cooperation.

Subject	Yes	No
Does your company comply with all the laws and regulation in force, especially with those in regards to labor, employment, occupational health and safety etc.?	<input type="checkbox"/>	<input type="checkbox"/>
Does your company respect the rules of conduct stated in the fundamental Conventions of the International Labour Organization (ILO)? In particular the following International Labour Standards: <ul style="list-style-type: none"> • C87 and C98 on freedom of association • C29 and C105 on the abolition of forced labour • C111 and C100 on equality • C138 and C182 on child labour 	<input type="checkbox"/>	<input type="checkbox"/>
Does your company meet the requirements 1 to 8 of the Social Accountability 8000 (SA 8000) Standard?	<input type="checkbox"/>	<input type="checkbox"/>
Does your company have a SA 8000 Standard Certification? If yes, please enclose a copy of your certificate.	<input type="checkbox"/>	<input type="checkbox"/>
Does your company comply with the UN Global Compact's ten principles ³⁾ ?	<input type="checkbox"/>	<input type="checkbox"/>
Does your company respect the rights and title to property and land of the individual, indigenous people and local communities?	<input type="checkbox"/>	<input type="checkbox"/>
Does your company know that Jungbunzlauer has a zero tolerance for land grabbing (very large-scale land acquisitions, either buying or leasing, in developing countries) policy?	<input type="checkbox"/>	<input type="checkbox"/>

¹⁾ <http://www.ilo.org>

²⁾ <http://www.sa-intl.org>

³⁾ <https://www.unglobalcompact.org/what-is-gc/mission/principles>

Jungbunzlauer

Subject	Yes	No
Does your company have a system in place to assure the compliance of its own suppliers to the above mentioned principles, standards and/or codes of practice? If yes, please describe:	<input type="checkbox"/>	<input type="checkbox"/>
Do you collect data on the following parameters? <ul style="list-style-type: none"> • CO₂ emissions / carbon footprint • Water consumption • Waste 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Do you have reduction initiatives for the following parameters? <ul style="list-style-type: none"> • CO₂ emissions / carbon footprint • Water consumption • Waste 	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>	<input type="checkbox"/> <input type="checkbox"/> <input type="checkbox"/>
Additional comments:		

Above all, the SUPPLIER certifies that none of the products purchased by Jungbunzlauer and manufactured by the SUPPLIER, has been produced or packed using forced, prison, dangerous or concealed labour and/or child labour.

"I have read and understood the above questions and I am entitled to answer them on behalf of my company."

Company name:	
Name:	
Position:	

Place, Date: Company seal:

Signature:

Please return this form via mail to:

Jungbunzlauer Canada Inc.
Dave Borgatti
1555 Elm Street
Port Colborne, Ontario L3K 5V5

In case of questions do not hesitate to contact:

Bill Jamieson
 Quality Assurance Manager
 Phone: +1 905 835 3281
 E-mail: bill.jamieson@jungbunzlauer.com