Milcobel Code of Conduct

December 2024 - Version 12.0



Foreword

Dear Reader,

Milcobel is a leading Belgian dairy cooperative in the purest sense of the word. We strongly believe in the value of cooperative entrepreneurship, shaped by and with our dairy farmers. A unique economic concept, where social responsibility is ingrained in our DNA, with a strong focus on quality, sustainability and respect for our local communities.

Our objective says it all:

> *We strive for a Belgian dairy cooperative that operates sustainably and in harmony with society, and that is fairly rewarded and valued for it, both locally and internationally.*

Based on our operational and commercial excellence, we strive to provide optimal customer service while remaining true to our high standards of ethical business practices and sustainable production.

As a cooperative, we care about the entire value chain, from cow to customer, enabling us to maintain high standards of quality, food safety, sustainability and social responsibility. We are 100% committed to cooperation, connection and dialogue with our dairy farmers, our customers, our stakeholders, our employees, and society at large.

With this Code of Business Conduct, we lay down the commitments and standards of behavior that each of us at Milcobel adheres to, and that we also expect from our business partners.

Peter Grugeon

CEO Milcobel Group

December 2024



THE 12 PRINCIPLES OF OUR CODE FOR BUSINESS CONDUCT

TABLE OF CONTENTS

Milcobel Code of Conduct 1

Foreword 2

Introduction 4

1. Compliance with laws, rules and regulations 5
2. Safety and Quality 5
3. Fair and ethical relationships 5
4. Administration and Accounting 6
5. Fair Competition 6
6. Relationship with the community 7
7. Environment and Climate 7
8. Governments and International Organizations 7
9. Anticorruption 7
10. Conflicts of interest 8
11. Confidentiality and data protection 8
12. Money Laundering and Fraud 9

Contact Milcobel 11



Introduction

All employees, including managers and directors of Milcobel cv and its affiliated companies (Milcobel), must follow our Code of Business Conduct. We also expect our business partners to follow our Code.

Compliance with this Code and its principles is a shared responsibility. It begins and ends with each of us, including you!

Milcobel informs its employees about the existence and principles of the Code and expects them to know the Code and use it as a guide for their behavior.

Violations of our Code can harm our business and our people and undermine the trust others place in us. Therefore, failure to comply with the Code is taken extremely seriously and violations may result in disciplinary or legal action against those involved.

This Code and its principles may also be further elaborated in separate policies and/or trainings that are integral to the Code and must be adhered to.

TIPS TO EMPLOYEES

- **Always use common sense** and make sound business sense: if something doesn't seem right, it probably isn't.
- **Seek advice or assistance from your supervisor, HR partner or the legal team when in doubt.** The consequences of a breach can be severe, even if the breach is unintentional. So seek advice before proceeding. Prevention is better than cure!
- **If you see or suspect something, say something.** Contact the legal team or use the whistleblower channel if you observe or suspect possible risks. Never turn a blind eye!

THE 12 PRINCIPLES OF OUR CODE FOR BUSINESS CONDUCT



1. Compliance with laws, rules and regulations

Milcobel and its employees will always and everywhere comply with the applicable laws and regulations of the countries and markets in which we operate.

We respect international agreements on human rights. Thus, we will not tolerate violence, harassment, intimidation, discrimination or any form of forced or child labor. We also respect equal opportunities for all employees and their right to join unions.

In addition, employees must comply with internal rules and regulations that apply. These internal rules and regulations are specific to Milcobel and may go beyond what is required by law.



2. Safety and Quality

At Milcobel, we are committed to providing a safe and healthy work environment with due attention to good mental health and general well-being.

We base our success on the quality and safety of our products, and our respect for the highest quality and safety standards.



3. Fair and ethical relationships

Milcobel maintains honorable and ethical relationships with all its customers, business partners and stakeholders, based on transparent and respected business terms.

Customer satisfaction is crucial. We follow all laws and regulations applicable in the countries where we do business, as well as best practices in honorable and responsible marketing and accurate and clear labeling.

4. Administration and Accounting

At Milcobel, we follow best practice standards in the area of corporate governance. Corporate governance equals sound management and is essential for running Milcobel as a company.

Milcobel strives for corporate governance that:

- is embedded in the company's values;
- provides mechanisms to ensure leadership, integrity and transparency in the decision-making process;
- contributes to establishing Milcobel's objectives, how these objectives are to be achieved and how performance is to be evaluated.

Corporate governance also requires control. This is:

- an actual evaluation of performance,
- conclusive management of potential risks,
- An oversight of compliance with agreed-upon procedures and processes.

This is to avoid potential conflicts of interest or any abuse of power in the conduct of business.

We conduct our accounting and financial reporting in accordance with relevant legislation and local standards. Employees must never engage in fraudulent or other dishonest behavior with respect to Milcobel's or a third party's financial reporting and accounting. Milcobel's financial records are the basis for managing its business activities and fulfilling its obligations to various stakeholders. Every financial record must be accurate and in accordance with Milcobel's accounting rules and regulations.

5. Fair Competition

At Milcobel, we believe in and promote the principle of fair competition. We will not engage in anti-competitive behavior or unfair business practices, either with respect to our customers and business partners or with our competitors.

All employees, but especially those involved in marketing, sales and purchasing, or who have regular contact with competitors, have a responsibility to ensure that they are familiar with applicable competition laws and receive training on them.

They will adhere to Milcobel's Competition Manual in which this principle is further detailed.



6. Relationship with the community

As a responsible and sustainable employer, dairy producer and active social stakeholder, we are committed to making a positive impact on the development of the local communities in which we operate.



7. Environment and Climate

At Milcobel, we respect and protect the environment and climate by developing our business in a sustainable way. We monitor and report our impact and strive to minimize our environmental footprint wherever possible. In doing so, it is essential that all necessary environmental permits, licenses and registration are obtained and documented.



8. Governments and International Organizations

As a company, Milcobel does not make political donations. We will participate as a company or member of the industry in the development of regulations and legislation, and where we do so, we will act transparently and ethically.



9. Anticorruption

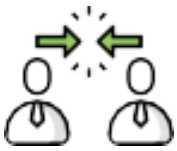
Milcobel has zero tolerance for corruption or bribery. We stand for acting honestly and we never promise, give or accept bribes or other unauthorized benefits for business or personal gain.

Employees must never offer or promise, directly or through intermediaries, any personal or improper financial or other advantage to obtain or retain any business or other advantage from any third party, whether public or private. Nor should they accept such a benefit in exchange for preferential treatment from a third party. In addition, employees must refrain from any activity or conduct that might give rise to the appearance or suspicion of such conduct or the attempt to do so. Employees should be aware that offering or giving improper benefits to influence the recipient's decision, even if he or she is not a government official, may result not only in disciplinary sanctions, but also in criminal prosecution. Improper benefits can include anything of value to the recipient, including employment or consulting contracts for closely related parties.

All employees must take note of - and will comply with - Milcobel's Anti-Corruption Policy in which this principle is further detailed.

They always respect our zero tolerance policy, regardless of local customs or practices.

Anyone who observes or suspects corrupt practices involving our company, employees or business partners should speak out. This gives us the opportunity to end or prevent corruption. This is essential to protect our company and our employees.



10. Conflicts of interest

Every employee is expected to act in the best interests of Milcobel and take responsibility for reporting possible conflicts of interest to his/her supervisor and the legal team. A conflict of interest occurs when an employee's personal interests or the interests of a third party conflict with Milcobel's interests. In such a case, it may be difficult for an employee to act entirely in the best interests of Milcobel. All our permanent or temporary employees, service providers and board members must be free from undisclosed existing or potential conflicts of interest. All employees must take note of - and will abide by - Milcobel's Anti-Corruption Policy in which this principle is further detailed.



11. Confidentiality and data protection

We recognize the importance and protection of confidentiality and will not disclose any confidential information to unauthorized persons. Confidential information is any Milcobel business information that is not available to the general public. Unless required by law or authorized by supervisors, employees shall not disclose or permit such disclosure of confidential information. This obligation continues even after termination of employment. Employees will make every effort to prevent inadvertent disclosure by taking special care when storing or transmitting confidential information. In the event that third parties, such as suppliers or customers, share confidential information with Milcobel, each employee shall treat such information with the same care as Milcobel's own confidential information.

Employees must handle and protect our data and records with care. Data is essential and sensitive. By protecting it properly, we reduce the risk of unauthorized use:

- Confidential information is shared only on a need-to-know basis. This means only with people who need it to do their jobs. Third parties (such as consultants) must sign a confidentiality or non-disclosure agreement before starting work. Employees do not pass confidential data to publicly accessible - AI-based - platforms, machines and/or bots (such as ChatGPT);

- Employees take physical precautions. They do not leave confidential information unattended or discuss it in a public setting where others can hear it;

- Employees are digitally vigilant. Personal email, social media, instant messaging services, cloud storage or open cloud services are not used to store or transfer non-public information. Employees ensure all devices are secured with strong passwords that are regularly updated and private.

Milcobel and its employees respect the privacy of every employee and other stakeholders. We treat personal data in accordance with applicable data protection laws and requirements and with our own Data Protection Policy of which every employee should be aware.



12. Money Laundering and Fraud

At Milcobel, we reject any attempt to use our company to launder money, and we work only with legitimate customers and business partners. Employees must be alert to alarm signals where money laundering is concerned. These are warning signs of suspicious or unusual activity, such as:

- Large cash payments;
- Payments made from high-risk countries or from offshore bank accounts;
- Payments by another third party (triangular payments).

Fraud can have serious financial and reputational consequences for our company. Employees who commit fraudulent acts may be subject to disciplinary action and legal prosecution, as well as damage to their professional reputation.

Therefore, Milcobel does not tolerate any form of fraudulent behavior and we expect each of us to ensure that our records and archives, both financial and non-financial, are accurate, complete and transparent.

Examples of fraud include:

- Falsifying documents, such as books, sales figures, quality reports, timesheets, expense reports or financial and non-financial statements or omitting facts;
- Theft, misappropriation or misuse of company assets or resources for your own benefit;
- Willful misapplication of internal rules relating to accounting, billing, rebates, payroll and claims

Employees should ensure accurate records and archives:

- Employees ensure that the information and transactions they document, such as expenses, revenues, invoices, purchase orders and claims, are recorded accurately, completely and in a timely manner;
- Employees do not antidate or alter company documents;
- Employees do not falsify the true nature of a transaction;
- Employees do not intentionally record transactions in the wrong accounting period or under the wrong account or department.

It is critical that all employees ensure that our records and archives accurately reflect our business performance and results at any given time.

ATTENTION - TIP TO EMPLOYEES

- Act with integrity and professionalism. Make sure the expenses you make on behalf of the company are for the company and not for you personally. Only legally bind the company if you are authorized to do so, and don't try to circumvent the rules (for example, by splitting invoices to stay within your authorization limit).

- Always choose Values over Value. Never give in to pressure to falsify files and records, do or ignore something that is illegal or unethical, such as moving sales or financial results to another reporting period.

- Do not hide or destroy documents or files and records. Especially not if they are the subject of an investigation or may be used in official proceedings.

- If you see something that doesn't seem right, say something. If you witness fraud or suspect fraud, use the whistleblower channel immediately.

Contact Milcobel

Acting ethically is important to Milcobel. Our employees will therefore report any practices or actions that are inappropriate or illegal according to our Code to their supervisors or the reporting structures within Milcobel provided for this purpose by law.

We encourage our employees to report all of their concerns. There will be no retaliation against anyone who reports a concern in good faith, and when a violation is identified, appropriate action will be taken.

Employees and external parties can report violations of the rules outlined in this policy through the Whistle Blowing Channel in several ways as also described in MILCOBEL's **Whistle Blowing Policy**. Reporting can be done through the following channels:

Online: https://milcobel.integrityline.app/

Via email: legal@milcobel.com

By mail MILCOBEL CV, Legal Function, Fabriekstraat 141, B-9120 Kallo





Owner : Milcobel Legal Function		
Date of approval 01-12-2024	Start date 01-12-2024	Version: 12.0

Milcobel cv
Fabriekstraat 141 - Haven 1140 - 9120 Kallo - Belgium
T +32 (0)3 730 18 00 - **F** +32 (0)3 730 19 00
E info@milcobel.com
VAT BE 0870.019.427 - RPR Ghent, Dendermonde division **www.milcobel.com**