



HOCHDORF
+ Swiss Nutrition Solutions



GUIDE FOR EMPLOYEES

CODE OF CONDUCT

GUIDING PRINCIPLES & POSITIONING

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FOREWORD

«Always do right. This will gratify some people and astonish the rest.» (Mark Twain)

Dear Colleagues,

All employees sign this policy to confirm that they have read and understood the guidelines it contains. This underlines how important it is to us. Whether it is our Code of Conduct or our Guiding Principles: unless our employees are committed to putting them into practice and living by them every day, these binding policies are just empty words.

The society and community we live in expect HOCHDORF and all our employees to operate with integrity and sustainability in our business. On the following pages, we explain what we mean by this in our Code of Conduct.

Our products make an important contribution to the lives of those around us – from babies to senior citizens. The employees and representatives of HOCHDORF behind our products represent the values and principles of the company in everything they do. Every contact with us is a brand experience. This policy should help all employees to gain a shared understanding of the company expectations.

We also expect you to provide us with constructive criticism. Please tell us if you have any suggestions for improving this guide. If you have any questions, direct them to your line managers, senior management or to our Board of Directors.

Thank you for taking the time to internalise this employee guide and to make it part of what you do.

A handwritten signature in blue ink, appearing to read 'J. Oleas'.

Jürg Oleas


Chairman of the Board
of Directors

A handwritten signature in blue ink, appearing to read 'R. Siegl'.

Ralph Siegl

CEO & Delegate of the Board
of Directors





CODE OF CONDUCT

Fair competition

We are committed to a free market economy and fair competition; this ensures that our work and our services are properly recognised. We lose credibility and trust if there are discrepancies in the way we treat our customers or if we make alliances with our competitors.

Our conduct must adhere to any applicable monopoly regulations and other laws governing competition. This is our commitment to open and independent competition in all markets. We do not make any agreements with competitors to set prices or unlawfully apportion products, markets, areas or customers.

We do not share information with our competitors with regard to price, profit margins, costs, offers, market shares, sales practices or conditions of sale.

We do not abuse our strong position on the market.

Invitations must be deemed reasonable so as to avoid placing the recipient in a position of dependency. We would class lunch or an evening meal with representatives of companies working with HOCHDORF as permissible, as well as special events such as company anniversaries, open days or one-off events organised by HOCHDORF Group companies and approved by senior management (including trade fairs).

Stricter rules apply when dealing with government representatives or employees. No gifts, gratuities or invitations may be given to people in these positions.

No discounts or other benefits may be granted that are not justifiable by and proportionate to the work and service provided by the business partner. Any actions that encourage or support infringements against laws or regulations by customers and suppliers are to be refrained from.

There is an expectation that the Board of Directors and senior management show a good example in respect of these principles and that they promote exemplary conduct on the part of employees.

Bribery and corruption

Bribery, corruption and the granting of any undue advantage are not tolerated at HOCHDORF. Employees are not permitted to offer, request or accept any gifts, payments, invitations or services that are beyond the limits of normal business hospitality or are forbidden by law.

In certain circumstances, exchanging gifts is an expression of courtesy or reflects local customs and practices. Insofar as employees receive or offer gifts in such cases, their value in Switzerland may not exceed CHF 100 and the equivalent foreign currency value, adjusted for purchasing power. If employees receive gifts that exceed this threshold, these gifts must be handed over to HOCHDORF. The donors must be made aware of these rules.

CODE OF CONDUCT

Conflicts of interest

Fairness and the interests of the company and those of its stakeholders must take priority in all decisions. Personal interests must not compromise the interests of the company.

Conflicts of interest arise when personal, family or other interests clash with HOCHDORF's interests. Conflicts of interest frequently occur in situations when, for example, employees use their position to award orders, hire staff, access information of potential interest to the financial markets, agree contracts with a company owned or managed by a family member or partner, or when employees receive job offers from a competitor.

Commitments entered into by HOCHDORF must be able to withstand a third-party comparison at any time.

To avoid conflicts of interest from the outset, HOCHDORF applies the principle of dual control and double signatures. An individual's authority to sign is governed by the applicable signature regulations.

Possible conflicts of interest must be reported immediately to the line manager.

Confidential information and intellectual property

Trade secrets are the product of our investments, particularly from research and development, and are therefore a valuable asset. HOCHDORF provides information regularly in the form of media releases, information on products, business reports or other publications.

Any other information received by HOCHDORF employees in the course of their work, from which-ever source, must be treated confidentially. Documents and digital data carriers with trade secrets must be stored where they cannot be accessed by unauthorised persons. Likewise, our business partners also commit to confidentiality when we disclose our confidential information to them.

This regulation may also affect information provided to us by suppliers, customers or partners.



Insider information

By insider information we mean information that is not easily accessible by the general public, but that would be considered important by an investor who is trying to decide whether or not to buy or sell HOCHDORF securities.

HOCHDORF has strict rules and regulations (insider dealing regulations) with regard to the dissemination of information containing financial data, the business development plan or any changes to key personnel. Those who have access to insider information are forbidden both by law and by agreements with the stock exchange to trade in securities and to disclose that information to others.

Passing on insider information to other employees is not permissible either, unless the employees have to know the information and are aware of the responsibilities this implies. It is against the law to pass on insider information to third parties, including employees, family members or friends who might subsequently make an investment decision on the basis of this information.

Discrimination and harassment

The diversity of our employees is a great strength that makes us an attractive employer for people from the most diverse cultural and linguistic regions of the world. We want to attract the best staff, which is why we offer everyone the same initial conditions and promotion opportunities as part of our personal development policy.

HOCHDORF seeks to provide all employees with a working environment that is free from discrimination, harassment, intimidation or coercion that is either directly or indirectly related to ethnicity, skin colour, religion, mental or physical disability, gender, sexual orientation, age or nationality. Managers are obliged to actively promote and enforce this policy.

No forms of harassment by managers and other employees will be tolerated. It is everyone's individual responsibility to ensure that we meet this objective.

Harassment is considered a serious form of misconduct and may lead to disciplinary proceedings that could ultimately result in summary dismissal. The term "harassment" used in this policy includes sexual, racist, ethnic and other forms of discrimination, including discrimination based on mental or physical disability.



CODE OF CONDUCT

Occupational safety

HOCHDORF pays close attention to suitable working conditions and the promotion of health and safety in the workplace, as these factors play an essential role in the ability of our employees to perform their duties professionally. We are committed to applying safe working procedures and practices and to complying with all relevant laws and regulations. Furthermore, we are committed to supporting our employees effectively in achieving this goal through appropriate training and other measures.

Product safety and quality

HOCHDORF is committed to the highest standards of safety and quality for its products. Our sustainable business success is built on customer satisfaction.

Our quality policy and management systems achieve this by ensuring that all activities and processes along the supply chain from the producer to the consumer are properly managed and monitored.

Environmental protection

HOCHDORF is committed to the careful use of nature's limited resources to ensure corporate success based on sustainability.

We pursue initiatives that raise environmental awareness and responsibility. We focus strongly on our energy consumption and the related carbon footprint in addition to our water consumption, waste water and the environmental impact of packaging.

Child labour, forced labour

HOCHDORF supports the fundamental principles and core labour standards of the International Labour Organisation (ILO).

HOCHDORF supports the minimum permissible working age recommended by the International Labour Organisation, which may not be lower than the general school leaving age, nor under the age of 15 years.

HOCHDORF explicitly rejects all forms of forced labour including the employment of workers under in-humane conditions, the practice of physical violence or sexual abuse or restrictions on freedom. An individual's choice of employment should be voluntary and free from any threats.

Reporting of violations


The employees of all companies belonging to the HOCHDORF Group are responsible for ensuring that the principles defined in this Code of Conduct are adhered to, irrespective of the country in which the company is operating.

Employees are required to report violations of the law or this Code of Conduct, including requests for actions that may constitute a violation. Reports should be submitted to the direct line manager. If there are good reasons for not contacting the line manager, employees may report concerns directly to

whistleblowing@hochdorf.com

Confidentiality will be maintained as far as possible. All reports will be investigated and followed up. HOCHDORF will not tolerate discrimination or adverse treatment of persons who report violations. Abuse of the reporting procedure will result in disciplinary action.





THE HOCHDORF STRATEGY & BRAND POSITIONING

«Food for life»



«We are the Swiss technology experts for functional foods.»

BRAND POSITIONING

Our strategy is based on three pillars: nature, technology and people

The HOCHDORF strategy has a double foundation. It incorporates our corporate purpose and the three pillars of nature, technology and people.

We are convinced that nature has to be protected for us to produce quality products; it provides us with high-quality, healthy raw materials. Availability of the right technology is also essential to process the raw materials gently. And thirdly, people, with their sound knowledge of nutritional physiology, their technological expertise and their keen understanding of customer and consumer needs, are crucial to offering the best solution to our industrial customers and consumers.

It all adds up to: “smart nutrition” products.

Our positioning as a brand in the market

Brands always represent specific values. It's the same with HOCHDORF as a corporate brand. HOCHDORF represents typical Swiss values, like quality, reliability, attention to detail, passion and unspoilt nature. Each of the three principles of brand positioning is associated with three different values.

The brand positioning leads to HOCHDORF's positioning in the market. We are committed to being the leading Swiss technology experts for functional foods.

Our mission and vision

The mission and vision are at the top of our strategy. The mission explains why clients should place their trust and loyalty in us. Our daily actions must align with our mission to build credibility, trust and loyalty in how we interact internally and with our customers. The vision shows HOCHDORF's goal for the future and the way we want to develop.

Trust

We set the highest standards for integrity and our work.

All our internal and external relationships with stakeholders are based on trust – which is why we focus strongly on the safety and efficacy products. We are true to our word.

Quality

We only work with the best raw materials and semifinished products.

Our expertise in selecting and processing high quality raw materials and semi-finished products enables us to offer excellent products. We consider the smallest process details to ensure that our products meet customer expectations at all times.

Sustainability

We are mindful of future generations in how we deal our environment.

We maintain a respectful approach to nature and treat our resources responsibly.

Ambition

We set high targets for the best quality.

Our claim to be the world's leading Swiss brand for premium nutrition solutions is based on a spirit of innovation and passion for what we do.

Market leadership

We want to constantly drive our industry forward.

The high standards in our industry are constantly evolving. We want to actively shape and promote these changes by continuously developing technology and mutual knowledge transfer.

**«Innovation and nutrition technology
are our passion.»**

BRAND POSITIONING

Development

We are constantly learning and developing.

Our curiosity is the basis for our continuous development and for creating modern nutritional solutions. It's also why we invest in the further development of our employees and in the well-being and success of our customers.

Empathy

We listen carefully so we can understand.

We seek long-term partnerships with our customers and are aware of the responsibility this entails. We strive to understand the challenges and needs of our clients with empathy so that we can offer effective solutions. We are honest, friendly and reliable.

Agility

We work flexibly, focused on meeting the specific requirements of our clients.

Their challenges and goals are at the heart of what we do, which requires an agile and flexible approach from us at all times.

Openness

We support our clients in every challenge.

We find the right solutions for their challenges – with enthusiasm and joy. Our customers can always rely on that.



