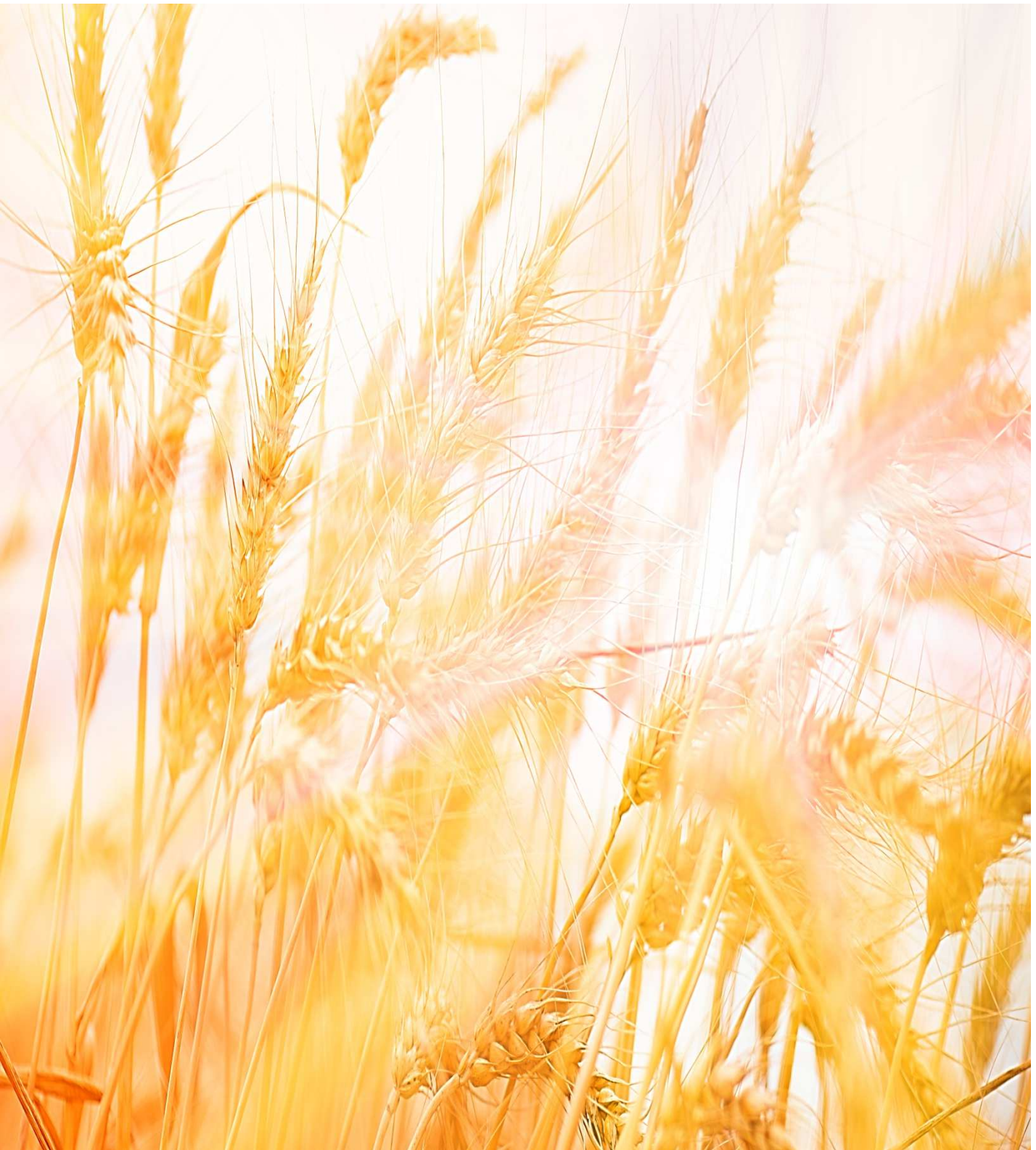


Company guidelines FOR EMPLOYEES and supplier companies



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PREAMBLE

Dear employees,
Dear business partners,

With these company guidelines, our goal as the general management of Detmers Getreide- Vollwertkost GmbH is to convey our values and the code of conduct we have designed around these values to all of our employees and business partners. These guidelines have been prepared in collaboration with colleagues in management positions, and provide a framework for how we see ourselves as a company, and how we want to work together. They are founded on the values and objectives we have developed in our over one hundred-year company history, while remaining focused on the needs of today.

On the following pages, you will learn a bit about our company history, our mission statement, and the values we want to guide our everyday work with one another. The code of conduct, which is derived from these values, serves as a guide for how we intend to implement and live out our values in everyday workplace situations. The code of conduct applies equally to all employees and business partners of Detmers, regardless of their position or of how long they have been with the company.

We request that you read the following pages carefully and integrate this information into your everyday activities on behalf of DETMERS Getreide-Vollwertkost GmbH.

If you have any questions, you are welcome to discuss them with your direct supervisor or the general management. Suggestions and ideas are very welcome.

We hope that you enjoy reading these guidelines.

Sincerely,

The management team of
DETMERS Getreide-Vollwertkost GmbH

COMPANY HISTORY

Initially founded as the Detmers family bakery by master baker Fritz Detmers and his wife, Friederike Detmers, in 1904 in Bielefeld-Jöllenbeck, the small bakery and import product dealer had developed slowly but surely into a large-scale bakery by the 1930s.

Far-reaching changes for the time were undertaken. The bakery was the first in its region to slice and package wholegrain breads, rye breads and pumpnickel. These were sold to bakeries in the OWL region with a horse and cart when the company was founded, and later using trucks. To ensure a longer shelf life, the breads were pasteurized in their packaging.

In the mid-1980s, the original bread production was converted bit by bit until it had been switched out entirely for muesli production. The principle of whole-food nutrition guided the actions of the production company from then on. Over the years, production capacity was expanded and crunchy and cluster production were added to the original muesli production capability. In addition, a hammer mill was put into operation in fall of 2016 in order to expand the range to include porridge products with this new manufacturing process.

Due to a lack of space for walking, working, and moving goods, the company left its original location at Eickumer Straße 94 in 33739 Bielefeld at the end of 2018. The entire company, including administration, production, logistics and quality assurance, has been working in the newly constructed warehouses and offices at Lechtermannshof 14-16 in 33739 Bielefeld since January of 2019. Detmers Getreide-Vollwertkost GmbH has a state-of-the-art production facility at this site, and has also revamped its brand image for an all-new public face.

Detmers Getreide-Vollwertkost GmbH employs approx. 55 staff members, and trains at least one young apprentice each year. As a manufacturer of organic and conventional products for retail partners domestically and abroad, Detmers Getreide-Vollwertkost GmbH has developed into a competent contact for high-quality private label products.

MISSION STATEMENT



We product high-quality muesli blends for people all over the world with experience, knowledge, and passion.

At our company, everyone contributes to serving healthy and delicious muesli to our customers everyday with their skills and abilities.

Transparent, direct, and targeted collaboration based on partnership with our suppliers, employees, and customers is our priority.

OUR PRODUCTS



Muesli

Muesli originally comes from Switzerland, where it was developed by a physician, Dr. Maximilian O. Bircher-Brenner. The Bircher muesli he originated has become part of a whole food diet successfully utilized since 1902. Today, Bircher Muesli is highly popular among young and old alike thanks to its ease of digestibility.

The idea of whole food nutrition has spread far and wide, resulting in many different combinations. Today, muesli is considered a regular fixture on store shelves. As an integral part of modern nutrition, sugar-free natural muesli delivers valuable minerals, vitamins, fiber, trace elements, and power.



Porridge

As the name indicates, porridge originally comes from Great Britain. Traditionally, it refers to oats soaked in milk. Today, porridge is eaten all around the world. One feature of porridge is that the consistency of the flakes is finer, making them better able to dissolve in liquid. Our porridge is fortified with a variety of natural ingredients. Of course, it contains no sugar or preservatives. Soy, almond, or coconut milk and yogurt can be used to prepare a healthy porridge, along with common cow's milk. Porridge tastes great cold or warm.



Crunchy and Granola

Our crunchy products and granolas are baked muesli. To make these products, we gently press flakes on sheets before mixing them with other ingredients, then bake them carefully in specialized ovens. Each batch is inspected by trained professionals and using technical equipment in the quality department before the baked, golden brown flakes are carefully packaged fresh.

We eliminated the use of palm oil, which has negative environmental impacts, many years ago in the production of our crunchy products and granolas. We prefer natural honey or vegan agave as sweeteners.



Single ingredient products

Of course, our customers can also create their own muesli at home to match their tastes. Some people like to keep things simple – just plain flakes in their yogurt – while others combine them with fresh fruit. We offer natural single ingredient products like oats, spelt pops, cornflakes, and much more for people to make their own muesli.

OUR VALUES

1. Quality and safety awareness

People trust us and our products. We consider this trust to be our assignment, governing our everyday work. All of our activities throughout the supply chain are carried out with care and attention, with a focus on the needs of our consumers and customers.

2. Protecting the environment

By working in a way that saves resources and using state-of-the-art technology, we prevent environmental impacts whenever economically feasible.

The goal of our work is to continuously improve our environmental performance.

3. Identification and responsibility

Our underlying goal is to increase all employees' sense of responsibility, thereby actively promoting continuous improvement and a living food safety through open communication in every area of our company.

We believe it is important for employees to identify not only with our products, but with the company as well.

4. Efficient price-performance structure

To offer our customers a fair price-performance ratio, we ensure the highest levels of efficiency and safety in our processes. We optimize our processes using state-of-the-art technologies, and use valuable resources in an appropriate way.

5. Sustainable thought and action

We think and act in a sustainable way. In doing so, we consider both the impacts our actions have on nature and the environment, as well as working conditions for people at our site and throughout the entire supply chain.

6. Treating people fairly

We act with respect and value the dignity of each person we interact with. We treat all people equally, without disadvantaging them due to their ethnic origin, beliefs, gender, sexual identity, disability, age, or other characteristics. We also observe this fundamental principle in our relationships with partners and third parties.

7. Compliance with the law

Legal compliance forms the foundation of all of our activities. As an international company, we observe legal framework conditions in individual countries. Legal regulations have the highest priority in all of our decision-making.

8. Openness to new things

In line with our company's tradition, we want to regularly assess and tap into new market developments. We specifically address new risks and opportunities, and take them into consideration in our everyday activities.

CODE OF CONDUCT

Introduction

The following code of conduct is intended to implement our mission and our values in our everyday activities, and to govern the way we work together at DETMERS.

It is not intended to be a complete collection of regulations, and does not replace any contractual documents. Instead, it serves as a point of reference, combined with common sense, for what constitutes integrity and responsible, ethically correct behavior at work.

In order to foster our corporate culture both internally and externally, all employees and business partners of DETMERS GmbH are required to be familiar with this code of conduct and integrate it into their everyday work. Guidelines and process instructions in individual areas should be consistent with this code of conduct.

This joint obligation will help us to be seen as an honest, reliable partner on the market in the future.

1. Quality and safety awareness

Our work processes are subject to the highest safety standards. These are described in implementing the requirements of the IFS Food Standards as well as the company-specific HACCP concept and applicable hygiene regulations.

Our safety concept is continuously reviewed through daily internal controls as well as regular internal and external audits.

2. Protecting the environment

Each employee supports the implementation of our environmental management system in accordance with the ISO 14001 standard in their respective area of responsibility.

Our goal is to save resources, avoid waste, promote recycling, and thereby continuously improve and optimize our environmental performance.

3. Identification and responsibility

Exemplary function and duty of care

Being a manager means taking on responsibility and care for your employees. We expect that every employee with management responsibilities will understand and model this behavior. We expect managers to actively function as role models in line with our values and code of conduct in our everyday work.

Sensitization and promoting awareness

Our goal is to sensitize employees working in the company, identify and disclose weaknesses, and help improve processes and products. We create basis for a living food safety through open communication and regular employee training programs, flyers, and informational events.

4. Efficient price-performance structure

Our processes must always be designed so as to prevent any kind of material waste. Every employee should work to handle our own resources carefully in their own area of responsibility.

5. Sustainable thought and action

Our production processes are based on state-of-the-art technology. To save valuable resources, we continuously track and implement improvements in our processes.

We believe it is essential for not only our company employees, but everyone involved in the supply chain to think and act in a sustainable way. Because of this, we primarily maintain delivery relationships with producers and suppliers who are certified according to relevant social and environmental standards.

6. Treating people fairly

General

All employees decide to take on their work at our company intentionally and of their own accord.

We always comply with the core labor standards of the International Labour Organization (ILO) and the OECD guidelines. To ensure this, Detmers Getreide-Vollwertkost GmbH is certified in accordance with the standards of the Rainforest Alliance and SMETA. We expect that our business partners will promote relevant certifications throughout the entire supply chain.

Employee protection

We work to protect the health and safety of our employees through measures to create a safe working environment, training, instruction, and regulations. Each manager is responsible for training and supporting their own employees on compliance with all of these measures.

Equal treatment

We believe that all people should be treated equally, regardless of their origin, age, gender, sexual orientation, disability, or beliefs. We reject any form of unfair treatment, basing our actions on the United Nations Charter and the European Convention on Human Rights.

We have no problem integrating employees from different cultural backgrounds and countries of origin and respecting their ethical concerns. We foster a good work / life balance.

Business partners and competitors

Entering into private business relationships with business partners or competitors is prohibited, if this would result in a professional conflict of interest. Employees may not enter into any business relationships with a business partner over whom they can exercise significant direct or indirect influence. In general, private and business interests should be kept separate. Furthermore, we expect that decisions will always be made in the best interest of the company.

Any use of professional activities to gain private advantage is prohibited.

Fraud

We do not tolerate fraud. All relationships with officials, companies, and private individuals must be designed so as to prevent even the appearance of corruption.

7. Compliance with the law

All employees are personally responsible for complying with the law in their own actions and area of responsibility.

Data protection

Protecting the personal data of our employees, customers and business partners is highly important to us. Therefore, we only collect, store, or process personal data if this is necessary for defined, clear and legally permitted purposes. We support the security of data and processing procedures through relevant technical and organizational measures. All employees must observe the data protection regulations relevant for their work area with the necessary level of care.

Complaint management

All employees are obligated and expected to disclose violations of the law or of this code of conduct, as well as of other relevant guidelines. They may contact either their direct supervisor, the complaint committee, or the general management directly if necessary to do so.

STRUCTURE, RESPONSIBILITIES, AND CONTACT PERSONS



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