

# GNT Code of Conduct 2024

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# Preface

*We operate with integrity.  
Always. Everywhere.*

Since 1978, GNT has built a strong name and reputation as a family-owned, value-driven and responsible company. Our success and strength come from our commitment to hold ourselves to the highest standards of integrity and to put people at the heart of everything we do. This is fundamental to our mission. We create plant-based ingredients to drive a healthier future for people and planet. We work every day to earn our customers' trust by delivering innovative solutions and exceptional performance to make a positive impact.

As a worldwide market leader in sustainable, plant based colors, we operate in various regions with differing cultures and characteristics. This may present us with various challenges and even dilemmas. When dealing with these we choose to navigate on the basis of our common compass: our values, reflecting the fundamental beliefs of GNT.

They guide our internal conduct as well as our relationships with all our stakeholders - employees, customers, suppliers, competitors, governments and the communities in which we operate.

We are proud to confirm our GNT Code of Conduct, providing us with guidelines for putting our values into practice. This Code contains standards of conduct to help us make the right choices and ensure we live up to our strong reputation and protect all GNT's stakeholders. For now and the future. Always. Everywhere.



Dr. Hendrik Hoeck  
Chief Executive Officer

# Reader's guide

## Who needs to follow our Code?

This Code of Conduct and its principles apply to all employees, officers and directors, everyone on the payroll and those working for GNT under our supervision on our sites and locations. Everyone is required to live up to the expectations we define in this Code. Managers of all levels are expected to lead by example, drive personal and group adherence to our principles, and make sure their direct reports receive appropriate ethical guidance and support.

We expect our suppliers and partners to follow the spirit and intent of this Code.

## How is this Code connected to industry standards?

GNT has been a longstanding member of Sedex, a profit organization dedicated to corporate social responsibility in global supply chains. We adhere to the ETI Base Code, including its environmental and ethical industry standards. This Code is based on the core principles contained in the International Bill of Human Rights, the fundamental conventions of the International Labour Organization, the Ethical Trading Initiative Base Code, relevant United Nations Conventions and Guidelines, and relevant GNT policies and guidelines.

## Approval

This Code has been approved and adopted on behalf of the Directors of GNT International BV in its meeting on Wednesday, the 26th of June, 2024.



# Our Purpose, Values

Mission | Vision | Values

## Our Mission



We create plant-based ingredients to drive a healthier future for people and planet.

## Our Vision



To be the market leader in sustainable, plant-based colors. Every day, we earn our customers' trust by delivering innovative solutions and exceptional performance.

## Our Values



WE ARE PIONEERS FOR NATURAL FOOD INGREDIENTS

WE ARE CUSTOMER-FOCUSED AND CONSUMER-DRIVEN

WE OPERATE A RESPONSIBLE SUPPLY CHAIN

WE LIVE THE FAMILY SPIRIT

# Our commitment

This Code sets out the baseline of ethical behavior, enabling employees and everyone who is working for GNT under our supervision on our sites and locations to make the right decisions and live up to our values. It is a key resource in providing guidance for employees, so that we can always do the right thing and maintain the highest standard of ethics, integrity and respect.

We ask you and all of our employees to read our Code carefully and apply the principles in your daily work at GNT. The Code provides guidance on how to act fairly and ethically in the various situations we encounter while working at GNT. However, that does not negate the need for us to always use common sense and sound business judgment. The nature of this Code is not meant to cover all possible situations that may occur. It is designed to provide a frame of reference to do the right thing. Employees and partners should seek guidance when they are in doubt about the proper course of action in a given situation, as it is the ultimate responsibility of each employee to do the right thing – a responsibility that cannot be delegated.

When you have doubts about how to act, have open and honest conversations about the situation and discuss your dilemmas with your colleagues, manager, HR team or your contact at GNT. Do not remain silent if you are concerned about a possible violation of our Code and principles. We ask you to speak up so that we have the opportunity to make things right. You will find more information on how you can [Speak Up](#) in the dedicated section toward the end of this Code.

Following the Code and the principles is the best thing you can do to live by our values. It shows the passion you have for our customers, the care you have for people and planet, the courage to dream and pioneer sustainable growth, and your commitment to doing the right thing.



# Our key principles

OUR KEY PRINCIPLES WE LIVE BY

# We care for people

**Human rights:** We are committed to respecting human rights wherever we do business. This includes, but is not limited to, freely chosen employment, children's rights, women's rights, minority rights and migrant workers' rights. GNT does not allow forced labor, involuntary or exploitative prison labor, slavery or people trafficking. All work should be voluntary and not subject to mental or physical oppression or pressure.

**Preserving the environment:** We recognize that we have an important obligation to contribute to preserving the environment and the planet's biodiversity for future generations. Our sustainability sourcing policy emphasizes our commitment to comply with environmental laws and regulations applicable to our business in the countries in which we operate.

**Diversity and fair treatment:** Mutual respect, diversity and equality are key to a successful working environment. We respect and value cultural identities and fully acknowledge individual contributions. All GNT employees, job applicants, contractors and others who are under GNT's supervision should be treated fairly and equally without discrimination against race, gender (identity or expression), religion, sexual preference, disability, pregnancy, political affiliation, union membership, national or social origin, age or any other



characteristics protected by law. We treat all personnel with dignity and respect and we will not engage in or tolerate the use of corporal punishment, mental or physical coercion, or verbal abuse of personnel. We will not resort to any harsh or inhumane treatment of anyone working for or with GNT.

**Fair labor standards and safe work environment:** We pay fair wages and our compensation and benefits are consistent with the provisions of all applicable wage laws, including those relating to minimum or living wages, overtime hours, and legally mandated benefits. We respect every employee's right to choose their employment freely, the freedom of association and the right to collective bargaining. Working hours will not be excessive. We will not use 'labor only' contracting arrangements, consecutive short-term contracts or false apprenticeship schemes to avoid fulfilling our obligations to employees under applicable laws pertaining to labor and social security legislation and regulations.

**Child labor:** We do not practice or tolerate any form of child exploitation in any part of our business. We never employ children below 15 years of age. Further, we do not provide employment to children under the age of 18 before they have completed their compulsory education, or for work that, due to its nature or the circumstances in which it is carried out, is likely to jeopardize children's health, safety or morals.

# We operate with integrity

**Compliance with the law and GNT policies:** We are a global company and therefore it is critical we comply with all laws applicable to our business in the countries in which we operate. While we acknowledge that standards of business partners may differ from ours, we find it important to adhere to the high ethical standards reflected in this Code and principles as well as all other GNT policies that apply to us, our jobs or tasks, even if these go beyond the legal minimum in the country in which we work.

**Bribery and corruption:** We do not pay or accept bribes or kickbacks, unlawful facilitation payments or considerations to obtain or retain business or obtain any other advantage, directly or through any of our agents or representatives.

**Money laundering and taxes:** We do not engage in money laundering, and we will take appropriate action in the case of any suspicious transactions, such as payments between unknown entities through an excessive number of intermediaries, high-value cash transactions, or payments made or received by suspicious entities. We will report and pay taxes in the jurisdictions in which we operate in accordance with all relevant tax laws and regulations.



**Gifts and entertainment:** We do not accept or provide gifts, favors or entertainment if the intent is to influence a business decision. In the right circumstances, a modest gift may be a thoughtful token of appreciation and strengthen a professional relationship; however, if not handled carefully the exchange of gifts can create a conflict of interest. To avoid this, we only give and accept non-monetary gifts of a value that is low enough to avoid having an influence on business decisions.

**Competition law:** We believe in a competitive, healthy free market system in which we can compete fairly. We respect the laws on competition in the countries we operate in and do not tolerate any violations thereof.

**Conflict of interests:** We avoid situations where our personal interests could conflict, or appear to conflict, with the interests of GNT.



# We commit to safety and social responsibility while maintaining high quality standards

**Care for safety:** We put safety first and have put multiple measures in place to ensure GNT offers a safe place to work. To prevent, manage, track and report physical injuries and work-related illnesses, we have established procedures and systems through which we encourage employees to report, classify and record these cases. We investigate and implement corrective and mitigating measures to address their cause and allow employees to continue to work safely.

**Impact of our activities:** Sustainability is an integral part of our business. We take responsibility for the social, environmental and economic impact of our activities while fulfilling our moral and legal obligations. Staying focused on what matters for our business and our stakeholders, as well as society and the planet, is at the heart of our sustainability strategy.



**Supply Chain Responsibility:** We encourage our supply chain partners to meet the requirements for sustainability set out by the business alliances we are a member of, including but not limited to Sedex. We work with our suppliers to understand how products are sourced and to ensure that the principles of sustainability are upheld.

**Commitment to quality and food safety in everything we do:** Quality is essential for our market leadership. It is reinforced by a company-wide quality culture to ensure the high performance of our products, continuous improvement, and dedication of suppliers and our people. We contribute to a food safety culture as a fundamental pillar in our business. This culture incorporates our values and internal and external standards throughout the whole integrated supply chain and organization to create a mentality and behavior that supports optimal food safety.

Our Management System is aligned with international standards and full transparency is ensured through verification by independent external bodies, including but not limited to:

- FSSC 22000 Version 5.1 by DNV GL – Business Assurance B.V.
- IFS Food Version 7 by DNV GL – Business Assurance B.V.
- SQF Edition 9 by EAGLE Certification Group
- Authorized Economic Operator (AEO) by Douane Eindhoven
- Organic Certification based on Regulation (EC) 2018/848 and its implementing regulations by Skal Biocontrole
- Kosher Certification by Star-K Kosher Certification and Rabbi Schlesinger, Rabbi of Strasbourg
- Halal Certification according to the HQAS standard by HFFIA – Halal Feed and Food Inspection Authority
- GMP+ Feed Safety Assurance scheme by DNV GL – Business Assurance B.V.

We communicate our standards to our business partners and expect them to share the same commitment to quality and meet our requirements consistently.

# We protect our assets

**Fraud:** We recognize that, as employees, we are trusted with GNT's assets to do our work. We protect GNT's assets and do not use them for unauthorized purposes. This applies to physical assets such as money, machinery and IT equipment, as well as intangible assets such as recipes, ideas, data and information. We recognize the necessity of protecting our supply chain from deliberate and intentional adulteration in our food products, food ingredients and food product packaging due to economic gain.

**Protection of confidential information, trade secrets and intellectual property:** We recognize that each of us has an obligation to keep confidential information, trade secrets and intellectual property safe and confidential. Our most valuable assets are our people and their knowledge, both of which are highly valued and protected. We understand that disclosure of confidential information to third parties may only occur after those parties have signed an appropriate confidentiality arrangement with GNT. We only disclose confidential information and trade secrets within GNT to those of our colleagues who have a legitimate business need to know.

**Conduct in research, development, application and creation:** We apply scientific honesty to all our research and are truthful when disclosing the results. We do not use any materials in our products that are prohibited by applicable legislation or industry guidelines.

**Creating and maintaining our business:** We all contribute to keeping books and records clear, complete and in accordance with applicable law to ensure we can rely on the accuracy of these records.



# We encourage you to communicate and Speak Up

As a family company, we expect everyone to be responsible and act with integrity. However, sometimes that is not the case. If you hear or see something that might conflict with our values or the principles of this Code, we encourage you to speak up. This allows us to address your concerns, and helps protect our people, our company and our workplace.

## What is Speak Up?

Speak Up essentially means to voice your concerns so that something can be done about them. Ideally, everyone should feel comfortable discussing concerns directly with the person involved. However, we all know that this is not always possible or realistic. That is why we offer several other ways to Speak Up.

## When can you Speak Up?

If you have experienced or noticed something suspicious, or if you feel uncomfortable about something, we encourage you to report it as soon as possible. Do not worry about how much information you have. By raising a concern early, we have the best chance of finding a solution quickly and preventing a situation from escalating. When you raise your concerns, we have a process in place to access and investigate it with due care.



# How to Speak Up

There is more than one way to voice your concerns and Speak Up. It is up to you to choose the way that feels most comfortable for you. We always encourage you to talk directly to the person involved. Together, you can often resolve problems in the best and most efficient manner.

## **Your manager or contact at GNT**

If you do not feel comfortable discussing your concerns directly with the person involved, you can always reach out to your own manager.

## **Trusted colleague**

If you prefer to speak with a colleague with more distance from the situation, you can contact the GNT HR team, the GNT legal team or the trustworthy advisor at GNT we have at all our locations. You can informally ask them for advice on what to do. They can also help you to fill in a Speak Up report or create a report on your behalf.

## **Speak Up service**

You can also safely voice your concern through our Speak Up reporting tool on [www.exberry.com](http://www.exberry.com). It is accessible 24 hours a day, 7 days a week, in your own language.

The Speak Up service is provided by an independent, third-party company. This service enables you to leave your message via a phone call or the online portal and then receive feedback from a GNT officer within the system. You can choose to do this anonymously if preferred.

**Contact details and information**

GNT Speak Up is the main point of contact for any questions.

Website: [gnt.speakup.report/gnt](https://gnt.speakup.report/gnt)

Organization code: 10844

**General questions in relation to this EU Policy:**

Please send an e-mail with your question to GNT's Legal Department at [legal@gnt-group.com](mailto:legal@gnt-group.com). Any such general questions shall not constitute a report under this Policy.

Any questions in relation to other GNT policies and guidelines, including US and Singapore whistleblowing reporting policies<sup>1</sup>:

Country	Phone number	Phone instructions
France	+33 805 54 37 53	Freephone: +33 805 54 37 53
Germany	+49 800 18 18 952	Freephone: +49 800 18 18 952
Italy	+39 800 14 76 94	Freephone: +39 800 14 76 94
Netherlands	+31 107 00 75 03	Number: +31 107 00 75 03, call charged at local rate
Poland	+48 800 01 29 53	Freephone: +48 800 01 29 53
Spain	+34 900 03 11 56	Number: +34 900 03 11 56, call charged at local rate
United Kingdom	+44 800 02 24 118	Freephone: +44 800 02 24 118
Other EU	+31 107 00 75 03	Number +31 10 700 75 03, call charged at local rate

<sup>1</sup> Due to different regulatory compliance and applicable law related to GNT's legal entities registered in the United States and Singapore this EU SpeakUp policy does not apply to these entities.

# Speak Up policy

We all have a duty to protect the reputation and integrity of our company. GNT will take suspected violations of the Code seriously and investigate accordingly. The Speak Up policy describes what you can expect from GNT when you Speak Up and what possible steps will be taken after you raise a concern or file an ethics complaint. Subject to applicable local laws, appropriate action will be taken if a violation is confirmed. Any measures taken must be in line with applicable laws and regulations as well as local policies and procedures.

DO YOU FEEL  
COMFORTABLE  
SPEAKING UP  
YOURSELF TO THE  
PERSON(S) IN-  
VOLVED?

*Discuss with the people involved. Remember to take GNT's values into account and be respectful.*

DO YOU FEEL  
COMFORTABLE  
TO DISCUSS THE  
ISSUE WITH YOUR  
MANAGER, HR  
OR YOUR GNT  
CONTACT  
INVOLVED?

*Discuss with your direct manager, GNT contact-person or HR representative. They can help you define the next steps.*

ARE YOU STILL  
NOT SURE WHERE  
OR HOW TO  
ADDRESS YOUR  
CONCERN?

*Contact an ethics officer (vertouwenspersoon) or a member of the GNT Speak Up team.*

DO YOU WANT  
TO REMAIN  
ANONYMOUS?

*Use our independent Speak Up service.  
  
A member of the GNT Speak Up team will look into the issue.*

# Colophon

<b>Issued by</b>	GNT by the Directors Team of GNT International BV
<b>Policy contact</b>	GNT International BV Industrieweg 26 5731 HR Mierlo +31 40 780 03 00
<b>Effective date</b>	June 2024
<b>Version</b>	1.1
<b>Replaces</b>	GNT Code of Conduct, May 2022
<b>Related documents</b>	GNT Speak Up policy
<b>Note</b>	The Code provides our primary guide, but where local laws or regulations are stricter than the Code, they prevail.