

Leiber – Code of Conduct

I. Preamble

Leiber refines brewers' yeast into innovative products for humans and animals. For our customers we conduct research in our own laboratories and develop tailor-made solutions for healthy nutrition, biotechnology and agricultural applications. We reliably supply excellent products – and have been upcycling at world-market level since 1954.

Leiber has developed a special corporate culture that requires all employees to take responsibility and comply with specific ethical principles. Some of these principles go beyond legal regulations, as we consider some things that are legally permissible to be not representable from a moral standpoint.

Leiber's good reputation and the trust placed in us by our business partners, officials and the public heavily depend on the conduct of each individual employee at Leiber. Even supposedly minor rights violations can have a significant negative impact on this trust and cause major damage to Leiber. This Code of Conduct describes the behaviour expected from all employees, regardless of the respective legal environment the employee is working in. Each employee is expected to behave in a way that complies with applicable laws and the principles and values set out in this Code of Conduct.

In view of its responsibility towards our customers, business partners, employees, the public and the environment, the management team has worked together with the Compliance Officer to create this Code of Conduct. It is binding for our employees and is expressly supported by the managing directors and shareholders.

The Code of Conduct describes the ethical guidelines. It is oriented towards and based on the principles of the UN Global Compact (see attachment), the ILO Conventions, the Universal Declaration of Human Rights by the United Nations, the UN Convention on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women and the OECD Guidelines for Multinational Enterprises.

The Leiber Code of Conduct is a guideline aimed at upholding Leiber's interest in fair, sustainable, responsible and ethical principles of conduct. Leiber especially recognises its social responsibility. One essential aspect is the Leiber Sustainability Strategy and corresponding sustainability certification is being pursued in 2022.

The following Sections II to V represent minimum standards and are aimed at preventing situations that might call the integrity of the company and its employees into question.

II. General principles, laws and regulation

Leiber commits to fulfil its responsibility towards society in all of its business activities.

In all business dealings and decisions, Leiber will observe the respectively applicable laws and other relevant provisions of the countries in which it operates. Business partners will be treated fairly. Contracts will be adhered to, whereby changes to framework conditions will be taken into account.

III. 1. Corruption, anti-trust law, forced labour, child labour, money laundering, conflict of interest

a) Bribery and corruption

Leiber will in no way participate in bribery or corruption in order to achieve business advantages. Consequently, Leiber requires its employees to refrain from practices that could potentially be interpreted as inappropriate or are illegal.

When dealing with business partners (customers, suppliers) and government institutions, the interests of Leiber and the private interests of the employees will be kept strictly separate. Actions and (purchasing) decisions will be made independently of irrelevant considerations and personal interests.

In particular, the following are prohibited:

Criminal offences in connection with public officials:

The granting of personal favours (in particular, pertaining to money, such as payments or loans, also include the awarding of smaller gifts over a longer period of time) by Leiber and its employees to public officials (such as civil servants of employees in the public service) with the aim of obtaining advantages for Leiber, themselves or a third party.

Criminal offences in business transactions:

Personal monetary favours must not be offered, promised, granted or endorsed in exchange for preferential treatment in business transactions. In the same way, no valuable personal favours may be requested or accepted when dealing with business partners.

In contrast, socially acceptable gifts and invitations along the lines of normal business hospitality, manners and courtesy are permitted. The Leiber guideline 'Gifts and invitations' can provide direction on this.

If and to the extent that there is a risk of a conflict of interest, the Compliance Officer should be contacted and a decision on the case requested.

All sponsorship commitments, donations and contributions for non-profit purposes must be agreed and approved by the management team. The procedure is defined in the Leiber 'Donation guidelines'.

b) Behaviour towards competitors/anti-trust law

Leiber respects fair competition. For this purpose, Leiber complies with applicable laws, particularly those that protect and promote competition, including anti-trust laws and other laws aimed at regulating competition.

Any breach in competition or anti-trust law can result in severe consequences for Leiber, its reputation and the employees concerned. When dealing with competitors, these regulations prohibit in particular agreements on market sharing, the division of regional markets and customers, and other activities that influence prices or conditions, allocate sales areas or customers or prevent free and open competition in an impermissible way. Furthermore, these regulations prohibit agreements between customers and suppliers where customers are restricted in their freedom to autonomously determine their prices and other conditions for resale (Price and conditions provision).

In view of the fact that the differentiation between prohibited cartels and permissible cooperation can be problematic, the Compliance Officer must be contacted in each case of doubt and, if necessary, external legal advice also obtained. In accordance with this, the Compliance Officer must be involved or external legal advice obtained for all contracts or agreements that could raise issues concerning competition law.

c) Forced labour

Leiber rejects any form of forced labour.

d) Child labour

Leiber observes the regulations of the United Nations concerning human rights and children's rights. In particular, Leiber commits to complying with the Convention concerning Minimum Age for Admission to Employment (Convention 138 of the International Labour Organization) and the Convention concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour (Convention 182 of the International Labour Organization). If stricter benchmarks for child labour are set out by a national regulation, these must be given priority.

e) Money laundering

It is Leiber's company policy to refuse to do business with any persons or organisations involved in criminal or illegal activities. All employees are obligated to comply with the applicable laws and provisions on money laundering. Money laundering refers to the introduction of cash and other financial means from criminal or illegal activities into legal financial circulation through companies or banks. This introduction is only intended to conceal the true origin of the money. All suspicious payments or unusual financial transactions must be reported to the Compliance Officer.

f) Conflicts of interest

Leiber expects its employees to focus their attention solely on their tasks at Leiber throughout their working hours. Conflicts of interest or the mere appearance of such must be avoided. Conflicts of interest arise if employees pursue personal activities or interests and, as a result, act in a way that is detrimental to the interests of Leiber.

III. 2. Principles on social responsibility

a) Human rights

Leiber respects and supports compliance with the universally applicable human rights.

b) Discrimination/respectful conduct

Leiber commits to oppose any form of discrimination within the scope of the respectively applicable rights and laws. This refers in particular to any discrimination of employees based on gender, race, disability, ethnic or cultural origin, religion or world view, age or sexual orientation.

All employees have the right to be treated fairly, courteously and respectfully by supervisors, employees and colleagues. Leiber advocates for equal opportunities for its employees and applicants and has set itself the goal of establishing a working environment where each person can develop their abilities in the best possible way and without discrimination or harassment. All decisions must therefore be made objectively and based on performance.

c) Occupational health and safety

Leiber guarantees occupational health and safety at the workplace within the scope of national provisions. Leiber supports constant further development for improving the world of work.

d) Fair working conditions/equal opportunities

Leiber respects its employees' right to freedom of association within the scope of the relevant applicable rights and laws.

e) Environmental protection

Leiber is committed long term to the goal of environmental protection for today's and future generations. Laws enacted for the protection of the environment must be observed. Leiber supports the environmentally conscious activities of its employees for minimising the impact on the soil, water and air.

f) Business secrets

Leiber obligates its employees to keep trade/business secrets. Confidential information and documents must not be passed on or otherwise made accessible to third parties by Leiber employees without authorisation, unless permission has been granted to do so or the information is publicly

accessible. Employees are required to treat the property of Leiber responsibly and with reasonable care. This property includes both material and immaterial assets such as property rights, brands, business and trade secrets.

Leiber employees are encouraged to inform their direct supervisors, compliance officers or the ombudsman immediately in the event that confidential information is disclosed without authorisation.

IV. Suppliers

Leiber expects its direct suppliers to follow or introduce the principles of this Code of Conduct, and particularly Section III, in a similar form. Direct suppliers of Leiber ensure their own suppliers follow or introduce the principles of this Code of Conduct or in a similar form, as well.

V. Accounts, documents and financial reports

Leiber considers it crucial that our accounts and financial reports be correct and complete. They allow Leiber to be able to manage business operations in accordance with its planning at any time.

Furthermore, they are indispensable for fulfilling legal reporting obligations.

Leiber employees must ensure that: all accounts and documents are managed in an applicable, timely, careful and complete manner; the respective business process is reported applicably and truthfully; and the actual conditions of our assets, financial and income situation are shown.

VI. Privacy and information security

Leiber respects each person's right to privacy, which is why we comply with all applicable laws and regulations concerning the collection, processing and use of personal data. Any unlawful collection, processing or use of the personal data belonging to our employees, suppliers, customers and third parties is strictly prohibited. All personal data must be handled with reasonable care at all times and protected against access by unauthorised third parties. Various information security measures ensure implementation of the necessary controls and regulations that secure the availability of information, data integrity and confidentiality in the respective required scope.

VII. Exemplary function – managers and supervisors

Compliance with this Code of Conduct by managers and supervisors is especially important, which is why particularly strict benchmarks apply when assessing misconduct by this group of individuals.

VIII. Compliance/implementation

Leiber remains at liberty to introduce further guidelines concerning conduct for itself and its employees with higher requirements regarding ethical action.

Leiber commits to inform its employees of the content set out in this Code of Conduct and the resulting obligations. It is of prime importance for Leiber that business is carried out with honesty and integrity. We therefore expect that all employees fulfil the strict requirements set out in the Code of Conduct.

Leiber has appointed a Compliance Officer to answer any questions and advise on any problems relating to compliance with this Code of Conduct. Any communication with the Compliance Officer is treated as confidential.

You can contact the Compliance Officer if you have any questions concerning this Code of Conduct or its specific application. There is also an option to contact the external ombudsman, who is able to receive any questions or information concerning breaches.

Breaches or questions can be reported confidentially and anonymously to the Compliance Officer, Mr Christian Stork-Bohmann, at the following email address:

Mail: compliance@leibergmbh.de

Alternatively breaches or questions can be reported confidentially and anonymously to the external ombudsman, solicitor Mr Christian Lühning, Am Wall 199, 28195 Bremen, Germany, via email or telephone

Mail: info@amwall.eu

Telephone: +49 151 40531086

All employees are expressly encouraged to report any suspected breaches of this Code of Conduct to their direct supervisor, the Compliance Officer or the ombudsman.

Any employee who reports a breach of the Code of Conduct in good faith will be protected against any kind of repressive measures. Each report is examined with due diligence. If the reported breach is confirmed, corrective and disciplinary actions will be taken.



Bernd Schmidt-Ankum
Managing Director



Gilbert Klausmeyer
Managing Director

ATTACHMENT

United Nations Global Compact

The ten principles

The principles of the Global Compact are based on a worldwide consensus 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 Global Compact requests businesses to acknowledge, support and implement within their sphere of influence a catalogue of core values regarding human rights, labour standards, environmental protection and fighting corruption:

Human rights

Principle 1: businesses should support and respect the protection of international human rights within their sphere of influence

Principle 2: make sure that they are not complicit in human rights abuses

Labour standards

Principle 3: businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining, and in addition, for

Principle 4: the elimination of all forms of forced labour

Principle 5: the effective abolition of child labour

Principle 6: the elimination of discrimination in respect of employment and occupation

Environmental protection

Principle 7: businesses should support a precautionary approach to environmental challenges

Principle 8: undertake initiatives to promote greater environmental responsibility

Principle 9: encourage the development and diffusion of environmentally friendly technologies

Fighting corruption

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