



Code of Ethics

Guidelines of PHW Group

August 2012

Dear Colleagues,

every day we take responsibility for people, animals and the environment.

Sustainability, climate protection and social responsibility are firmly anchored in all the companies of the PHW Group and are actively communicated, lived out and encouraged. The responsible and sustainable shaping of the future is and remains our guiding principles:

- 1. Ecological and sustainable action*
- 2. Acting responsibly*
- 3. Cultivate open communication*
- 4. Safety and confidence for customers*
- 5. Appreciation and respect towards employees*

These guidelines are our connection, our benchmark and pledge for orientation. We started with our ecological policy in 2000. In the last years we complement statements about company policy, sustainability and finally about energy policy in 2011.

We define our principles on the next pages. It is ultimately the people who have a large impact on the style of the company. The cooperation between management and employees, between the company, customers and the public gives the whole thing a face.

The larger a company is and the faster its growth, the more difficult it is to know exactly how things should be and what is not desirable. In order to provide the necessary orientation we define our values as guidelines for our daily acting and togetherness.

I look forward to good teamwork!

A handwritten signature in black ink, appearing to read 'Peter Wesjohann'.

Peter Wesjohann
Chair of the Board of Directors
PHW

Group

1. *Ecological and sustainable action*

The worldwide political self-commitment to sustainable development applies also to PHW Group. We are aware that our action may have an impact on economic development, social security and the environment.

The management commits itself to request and encourage its business partners in international markets to comply with human rights.

The management undertakes to continue giving top priority to animal welfare and environmental protection.

The management undertakes to develop and implement measures for a continual optimisation of the safety and occupational health on the premises of the group.

Every employee must make sure that ecological and economic resources in his/her area of responsibility are being preserved.

Every employee of the PHW Group is invited to identify and assist in implementing opportunities for improvement in dealing with scarce resources and products on or for which we work.

2. *Acting responsibly*

Law-abiding behavior

The observance of law and order is of utmost importance to PHW Group.

Every employee must adhere to the statutory provisions corresponding to the legal order in which he/she is acting.

Violations of law will not be accepted by the company. The company will in such cases take disciplinary action without restriction – and regardless of the penalties provided for by law.

Where applicable, every employee must ensure that he/she is informed about the legal regulations in countries of exportation (EU and worldwide) in order to prevent any detriment to the company.

Dealing with information and data

PHW Group maintains and enhances its economic performance through knowledge and skills which afford the PHW Group a competitive advantage.

Every employee is required to secrecy about the group's internal matters. This includes, for example, information concerning the structure of the group and the individual companies, business, research and development processes and information about production. This obligation of secrecy also applies after termination of employment.

Every employee to whom this applies is obligated to report accurately and truthfully.

Every employee must take special care when dealing with personal data.

Personal data may only be collected, processed or used if this is necessary for predefined, distinct and legitimate purposes. The use of personal data must be transparent for the people involved, their-

rights to information and adjustment and, if necessary to objection, blocking and cancellation must be preserved.

No employee is allowed to recall data from the internet which call up racial hatred, glorification of violence or other criminal acts or contents which, in the existing cultural context, are sexually offensive.

3. *Cultivate open communication*

The management of the PHW Group attaches great importance to fair and open communication. Legitimate complaints will be taken seriously and thoroughly investigated.

Indications of behavior which are detrimental to the group members will be investigated. For this purpose, the management named a responsible person, who shall deal with indications of possible violations of the law confidentially.

In case of a complaint, every employee is first asked to talk to the person(s) involved if possible, with the aim of identifying solutions.

The employees giving cause for complaint are requested to behave in a fair manner vis-à-vis the person who made the complaint. The existing possibilities of an internal arbitration must be use.

4. *Safety and confidence for customers*

The PHW Group will be a reliable partner. The group is integrated in a worldwide network of business partners and at the same time in local social networks.

The sustainable production of our agricultural products and foodstuffs requires consideration of many details in the production process. Only thus can the PHW Group ensure production processes which are economic with resources, low on energy consumption and produce low levels of emissions. High ecological and social standards have been watchwords of the Group for many years now.

In 2011 the PHW Group announced social standards for business partners.

The goal of this Code of Conduct is to call for compliance on the part of our business partners with specific social and environmental standards (for example Legal Compliance, Freedom of Association and the Right to Collective Bargaining, Prohibition of Discrimination, Compensation, Working Hours, Workplace Health and Safety, Prohibition of Child Labour, Environment and Safety Issues, Corruption). (For more information visit www.wiesenhof.de)

The management commits itself to fair dealings with business partners. Even in the struggle for market shares great value is placed on acting ethically.

The management recognizes the social commitment of the PHW Group. As a result, it promotes social and humanitarian institutions and purposes within its means.

Every employee is obligated to observe the rules of fair competition.

Corruption and bribery are prohibited and will be punished. Every action of the employees must avoid creating an outward impression of dishonesty.

No employee is allowed to use his/her position to demand or accept any personal advantage from third parties. The Management adheres to binding agreements with all business partners and employees – and expects its counterparts and all its employees to do the same.

5. *Appreciation and respect towards employees*

The PHW Group wishes to provide its employees with a pleasant working environment whilst still promoting performance.

The management respects and esteems its employees. Social care for employees within its means is an important concern for the management.

The management promotes the technical advancement of its employees and integrates them in the process of constant improvement by providing necessary information.

The management promotes an open and fair communication and the advancement of team spirit.

The management and every employee respect the personal dignity, privacy and rights of each individual. This also applies to dealing with external partners.

The management assures that any kind of discrimination and sexual or other personal harassment or abuse in the workplace is unacceptable. A breach of these rules will be not tolerated.

Every employee is requested to

- ✓ *act in an exemplary manner and thus sincerely and fair*
- ✓ *accept criticism as a stimulus for improvement*
- ✓ *formulate his/her own critique in a motivating manner as an invitation for improvement*
- ✓ *improve his/her performance to promote the performance of the group as a whole and thus to secure his/her job and the jobs of the other colleagues*
- ✓ *pass on experience in order to be conducive to the success of the company.*