

Compliance: Anti-Corruption

A summary of key corruption issues and how to deal with them

Our Commitment on Anti-Corruption

We refuse to offer, give, request or accept advantages of any kind or anything of value in order to influence a process of decision making in an inadmissible way. We never participate in any kind of activities based on corruption, either directly or through any third party, and do not differentiate between public officials, holders of political offices or private entities. Involvement in activities based on corruption is strictly prohibited no matter the ranking or position of the individuals.



Using this overview in addition to our Guideline Compliance Anti-Corruption helps you and Nordzucker to avoid the risks and costs of corruption.

Gifts and Hospitality

The acceptance or granting of gifts and hospitality (including the offering, promising, giving, receiving and soliciting) is qualified as corruption:

- ! if they are used to take unfair advantage to influence a business decision;
- ! if they are used to take unfair advantage to influence decisions of authorities or courts; or
- ! if they create the impression of taking unfair advantage to influence a business decision and / or to influence decisions of authorities or courts

Nepotism

This involves a person using a position of power to obtain an advantage for a family member or friend. Nepotism is prohibited.

Conflict of interest

A conflict of interest is any circumstance that could raise doubts upon an employee's ability to act, judge, decide with total objectivity regarding Nordzucker's interests. Conflicts of interest are often linked to corruption.

Make conflicts of interest transparent and please report conflicts of interest that arise during your employment.

Donations and Sponsorship

Donations are grants on a voluntary and altruistic basis for charitable purposes like a scientific, cultural, or other charitable or non-profit purposes, with no expectation of a consideration.

Sponsorship is a marketing instrument based on an agreement and means supporting organisations or events through money, goods or services with the purpose of promoting Nordzucker's own communication and marketing objectives. The objective of sponsorship is to achieve a positive impact in terms of reputation and public perception.

Donations and sponsorship may only take place within the scope of the relevant legal system and in accordance with the valid internal rules and regulations, which are based on a transparent selection process and stated criteria for decision making.

Facilitation Payments

A facilitation payment is a small bribe known as a "grease payment" or a "speed payment" typically solicited to facilitate or expedite the performance of a routine transaction or service to which the person or company making the payment is legally entitled to receive.

As facilitation payments are bribes, they are generally not accepted in Nordzucker. Facilitation payments by Nordzucker might be permitted to avert a threat to your health or life, or the health or life of a third party.

Due Diligence of Business Partner

Nordzucker occasionally uses third parties (business partners) to perform work or provide services for Nordzucker or on behalf of Nordzucker.

Nordzucker may be liable for corruption committed by such business partners. Possible corruption risks could be:

- ! A business partner could claim bribes.
- ! External advisors, agents, subcontractors, suppliers, and intermediate traders could use a portion of their compensation to make a bribe on behalf of Nordzucker – even without informing us.
- ! A business partner may employ or associated with a person, who could be possibly influenced by Nordzucker, resulting in a conflict of interest that must be identified and managed.

That is why a due diligence of new, as well as existing business partners, is essential.

Hidden Commissions (Kickback payments)

A kickback payments involves two parties, which agree that a portion of sales, profits, bonus or provisions will be improperly given, rebated or otherwise returned to one of the parties (or someone else designated by that party) in exchange for making the deal. Hidden commissions are prohibited.

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Your leading key questions to avoid corruption in the daily business:

Always consider before offering, giving, or promising, as well as accepting and receiving, anything of value to or from any person or company, if a business decision can be perceived to be improperly influenced by this!

What would your superior or a colleague think and say about the purpose of your (planned) action?

Would you feel uncomfortable if your superior or colleagues notice your action? Would the (planned) action be appropriate to damage the reputation of Nordzucker, yourself, or the other party involved?

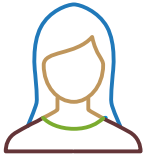
If the answer is “Yes” to one of these questions, you must not proceed.

Contact: If you have any questions please contact the Compliance Coordinator.

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You can find **more information** in the **Guideline Compliance Anti-Corruption (NZ-1.3.13-G)**.



Report any violations or hints immediately to one of the following contact partner:



- Superior
- Compliance Coordinator
compliance@nordzucker.com
- Ethics Committee
Ethics.Committee@nordzucker.com
- Anonymously via SpeakUp!
<https://www.bkms-system.net/nordzucker>

Please notice: Doing no business is better than doing business that involves corruption!