Policy Statement
of the Heidemark Group
on respect for human rights and
associated environmental standards

Foreword from the Management

As a company with a long-standing tradition, it has always been and remains our aim to secure the trust of our employees, business partners and customers by acting with integrity and in compliance with the law. We are aware that a team is only as strong as its weakest link. For this reason, it is of paramount importance that our business conduct is always guided by applicable laws and our internal company policies.

The cornerstones of the HEIDEMARK Group's corporate culture are morally impeccable conduct and behaviour that is, without exception, characterised by integrity and compliance with regulations. All our employees and business partners are required to comply with applicable laws and internal company guidelines. In this regard, the HEIDEMARK Group will support its employees and business partners in acquiring the necessary knowledge to ensure compliant behaviour in a responsible and autonomous manner.

Furthermore, we attach great importance to ensuring that both our employees and our business partners treat one another fairly and with respect. We expect our employees and business partners to act in accordance with the fundamental values of fairness and sincerity, particularly in their dealings with people, animals and the environment.

In line with these values, the protection of human rights and compliance with environmental standards are fundamental pillars of our business activities. This applies not only to our own company, but also to our supply and value chains.

We raise awareness amongst our employees about issues relating to human rights and environmental standards, with the aim of protecting the rights of people and communities within our value chain in collaboration with our business partners. To this end, we have developed defined processes to identify, prioritise and appropriately mitigate human rights and environmental risks. We expect our partners to comply with the relevant nationally and internationally recognised standards and to pass on these expectations throughout their value chains.

Our policy statement on respect for human rights and associated environmental standards reaffirms our long-term commitment. We will regularly review the processes and measures we have implemented and adapt them as necessary to ensure we continuously fulfil our corporate due diligence obligations.

Management of the HEIDEMARK Group

Who we are and what we stand for

HEIDEMARK is your first point of contact across Europe for turkey meat products. As an industry leader, we stand for precisely coordinated processing steps, flexibility and reliability in terms of both quality and volume. We actively provide our customers with inspiration for a market-oriented and contemporary product range and also meet short-notice customer requirements whilst ensuring maximum product availability. Our roots date back to 1965. Since then, HEIDEMARK has established itself as the market leader in the turkey sector. Today, the company is one of the largest in its sector across Europe. From our base in Ahlhorn, Lower Saxony, we supply customers throughout Europe.
Sustainable business practices, as an expression of corporate responsibility, are of particular importance at HEIDEMARK. Our actions today are intended, on the one hand, to meet the current and future needs of our society and, on the other, to safeguard our long-term business operations. As a market leader, taking a self-critical view is a matter of course for us. We define sustainability as the development of a sustainable poultry farming system that takes economic, environmental and social factors into account.

As a company, we respect the human rights and dignity of all people affected by our business activities and conduct our business accordingly. This includes all our employees, contractors and external stakeholders. We regard the protection of human rights as a central element of our corporate responsibility. We therefore respect human rights in our own business activities as well as throughout our global supply and value chains.

Our commitment to respecting human rights is based on

- the International Bill of Human Rights, namely the United Nations Universal Declaration of Human Rights,
- the United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles),
- the OECD Guidelines for Multinational Enterprises,
- the Declaration on Fundamental Principles and Rights at Work of the International Labour Organisation (ILO core labour standards),
- the International Covenant on Economic, Social and Cultural Rights, and
- the International Covenant on Civil and Political Rights.

In addition to the international standards mentioned above, we also comply with the relevant national regulations, foremost among which are the requirements of the German Supply Chain

Due Diligence Act (LkSG), ensuring that we always keep a close eye on the value chain as well as our own business operations.

In this way, we are doing our bit to help achieve the United Nations' Sustainable Development Goals (SDGs). We have firmly embedded these principles in our corporate philosophy.

For the sake of readability, we have chosen not to use both masculine and feminine forms of address. All references to persons apply to both genders.

Our commitment to human rights and environmental standards

We are committed to respecting internationally recognised human rights and upholding them in our business activities and throughout our value chains.
In particular, we undertake to identify the most significant human rights risks as part of our human rights strategy, to prevent them and to address any breaches in an appropriate manner. These include, in particular:

Child labour

Heidemark fundamentally rejects any form of child labour. It is a prerequisite that the minimum age for admission to employment, in accordance with ILO Convention No. 138, is not lower than the age at which compulsory schooling ends in the relevant country and under no circumstances lower than 15 years. Workers under the age of 18 are excluded from work that is deemed to be hazardous, unsafe or harmful to health.

Forced labour

Forced or compulsory labour is defined as any form of work, employment or service that is not performed voluntarily and is carried out under the threat of punishment. No one may be employed against their will or forced to work, not even in the context of prison labour.
This prohibition covers all forms of slave-like practices, serfdom and oppression.

Discrimination

For Heidemark, equal opportunities and equal treatment are a cornerstone of social sustainability. Therefore, discrimination – whether on the grounds of gender, age, religion, ethnicity, origin, disability, marital status, sexual orientation, political opinion, membership of a workers' organisation or trade union, or other personal characteristics (e.g. skin colour) – is prohibited and must not occur. Decisions regarding the nature and conditions of employment are made solely on the basis of employees' abilities.

Employment contracts

Employees must be provided with a written employment contract, where required by law. It is prohibited to withdraw or withhold personal identification documents of any kind from employees.

Remuneration

Employees' remuneration must not fall below the statutory minimum wage or – where a collective agreement applies – the minimum wage agreed under that agreement. Employees

must be allowed to dispose of a portion of their remuneration as they see fit, and the relevant statutory social security contributions must be paid. It is not permitted to make deductions from remuneration as a disciplinary measure. Wages must be paid in a manner that is convenient for employees. Employees must be regularly informed, in a form they can understand, about the breakdown of their remuneration.

Working hours

Working hours must comply with applicable law or – where a collective agreement applies – with the relevant collective agreement. Breaks must be granted in accordance with the law applicable in the relevant location. Employees' working hours must be recorded and remunerated in accordance with the applicable legal provisions. Overtime must be worked on a voluntary basis or be governed by a contract or a collective agreement. Furthermore, the rest periods between working hours (as prescribed by the applicable local law) must be observed.

Disciplinary measures

All forms of harassment, the infliction of physical or psychological harm, abuse and intimidation are prohibited. Only disciplinary measures that are in accordance with national laws and internationally recognised human rights are permitted. All employees must be treated with dignity and respect.

Freedom of association

It is a fundamental requirement that employees' freedom of association is recognised and safeguarded. Employees may, in accordance with local law, join or form employee representative bodies or trade unions of their choice. Membership of such an organisation must not result in employees being favoured or disadvantaged.

Health and safety

The health and safety of employees in the workplace must not be jeopardised. It must be ensured that the working environment is safe and that health hazards are eliminated as far as possible. Fundamental to this are, where practicable, clean sanitary facilities, adequate lighting, ventilation and heating systems, sufficient drinking water, as well as regular safety assessments, briefings and training. This also includes protection against fire, extreme heat or cold, and toxic substances. Employees have the right to be absent from work in the event of illness (upon provision of appropriate proof). Furthermore, access to healthcare must not be denied. Where there are relevant sources of danger, steps must be taken to ensure that workers are provided with appropriate protective equipment (e.g. protective clothing, hearing protection) whilst at work. Where sleeping quarters are provided, hygienic and safe conditions must be

guaranteed in accordance with the circumstances. Where private or public security personnel are engaged or utilised, it must be ensured that their deployment does not contravene environmental or human rights obligations.

Unlawful eviction and unlawful land expropriation

Land, forests and water bodies used to secure people's livelihoods must not be unlawfully expropriated from the persons concerned, nor must these areas be unlawfully evicted. All parties involved are obliged to prevent this when acquiring, developing or otherwise utilising land, forests and water bodies, in accordance with the applicable local law.

How we fulfil our due diligence obligations

We always comply with applicable laws protecting human rights and environmental standards, including the Supply Chain Due Diligence Act (LkSG). Where local law and international human rights standards are not aligned, we will act in accordance with the higher standard. We strive to fulfil our obligations on an ongoing basis through the thorough implementation of our due diligence obligations, the consistent involvement of relevant stakeholders, transparent communication and the continuous improvement of our internal policies and processes.

Supplier Code of Conduct (SCoC)

Through our Code of Conduct for suppliers, co-packers, licensees, their upstream suppliers and other business partners (Supplier Code of Conduct – or SCoC), we set out our binding expectations of those involved in our supply chain: that they, too, commit to adhering to the principles set out, implement appropriate processes to uphold human rights and environmental standards, and pass these expectations on to their own suppliers. This also includes a requirement for our suppliers to provide, upon request, relevant information on how they address the aforementioned principles within their own organisations and what processes and measures they have established to ensure compliance as effectively as possible and to counteract any undesirable developments.

How we identify, monitor, prioritise and mitigate risks

As a company, we have the opportunity to strengthen the protection of human rights in a variety of ways. We are aware of the potential human rights and environmental risks that may arise from our business activities. We regard it as part of our duty of care to identify potential and

actual adverse risks and impacts of our business activities on people and the environment throughout the value chain.

We endeavour to regularly analyse, document and continuously monitor risks and their specific links to our company through structured risk assessments of our supply chain. As a first step, in 2023 we began carrying out risk analyses relating to human rights and environmental issues across our group of companies and implementing a corresponding standardised process. In doing so, we are addressing human rights and environmental due diligence obligations throughout the HEIDEMARK Group and taking appropriate measures to mitigate any identified risks.

How we implement measures in response to identified risks

The results of the analysis of human rights and environmental risks and impacts are incorporated into relevant business processes, in particular our supplier management, but also into other internal company processes.

If a specific risk is identified at a direct supplier (high-risk supplier), a defined, interdisciplinary team determines appropriate preventive measures for the individual case (e.g. supplier surveys, contractual assurances, audits, training courses, etc.). The aim is to protect the (potentially) affected stakeholders and to avoid adverse human rights and environmental impacts, or at least to minimise them in advance.

How we deal with actual breaches

In cases where an actual human rights violation or a breach of an environmental obligation is established or appears likely, the relevant facts are substantiated by the responsible team and appropriate and effective remedial measures – up to and including the termination of the business relationship – are taken without delay to put an end to the violation or minimise its extent as far as possible.

How we assess the effectiveness of our measures

We continuously monitor the effectiveness of our compliance with due diligence obligations and make appropriate adjustments where we identify scope for improvement. In this context, we review, amongst other things, at least annually – and on an ad hoc basis where necessary – how effective our measures are in preventing and mitigating adverse human rights or environmental impacts.

We document our compliance with our due diligence obligations internally in an appropriate and ongoing manner. We also actively endeavour to offset any negative impacts to which we have contributed through our business activities – whether directly or indirectly.

Embedding risk management within our organisation

We have defined clear responsibilities for the fulfilment of and compliance with our human rights and environmental due diligence obligations.
To centralise the oversight of our risk management, we have appointed a Human Rights Officer, who reports directly to the management board. The Human Rights Officer is supported in the operational implementation of our human rights and environmental due diligence processes by a clearly defined interdisciplinary team. The team meets regularly, as well as on an ad hoc basis, documents its work and is also responsible for the further development of the relevant risk management and due diligence processes.

Our whistleblowing system

We reject any form of human rights violation. An appropriate and effective complaints management system is therefore a key component of our due diligence processes, enabling us to effectively prevent and remedy any potential adverse impacts arising from our company and our business activities.
To this end, we have set up a dedicated whistleblowing portal on our website www.heidemark.de, which enables internal and external stakeholders (e.g. employees, contractors, customers, local communities) worldwide to submit reports at any time, including on human rights issues and environmental breaches. Reports can be submitted anonymously and in various languages.
The whistleblowing system is a confidential communication channel. Information on how to access it is proactively communicated. All reports and suspicions regarding potential human rights or environmental violations in accordance with the LkSG are processed as part of a procedure that is transparent, balanced and predictable for all parties involved.

Ahlhorn, 1 September 2026
The Management of the HEIDEMARK Group