

## DMH Code of Conduct

It is important to have a joint understanding of the way we as DMH operate.

This Code of Conduct intends to show us how to make sound decisions and to illustrate proper actions for conducting DMH business.

The essential requirements of our Values, which apply across our company, are laid out in this Code of Conduct (Code). Everyone working for DMH, regardless of their location or function, is expected to fully understand this Code and to apply it to their workplace and responsibilities.

Together, our Values and this Code represent our commitment to upholding responsible business practices.

### **Who is required to follow our code?**

By knowing and following our Code, each of us does our part to maintain and further build trust with our various stakeholders—including our colleagues, customers and business partners.

It is important that we fulfill our commitments to these groups and uphold integrity in our interactions at all times.

Our Code applies to all employees, officers, directors, contract workers and agents of DMH, our departments and our affiliates in all countries.

### **Who we are**

Before we go into a more detailed description of our Code we like to describe how we see ourselves and to what core values we feel committed. These values help us fulfill our purpose and achieve our vision. They express what we expect of ourselves and each other. They guide our behavior and they serve as the foundation for our decision making. In everything that we do at DMH, we embrace and embody these values:

DMH is a modern company believing in modern values.

There are some basic rules that we all observe:

1. We are honest, fair, and ethical. We live our values consistently and courageously. We are not afraid to speak up. And we perform actions consistent with our claims.
2. We value open relationships and communication based on integrity, co-operation, transparency and mutual benefit, with our people, our customers, our suppliers and all our other business partners. Our people are fundamental to our success. We expect that all employees as well as the management and partners treat each other with respect and in a civilized manner.
3. We believe that a diverse workforce is essential for a successful business. We treat our people fairly and with respect, and ensure they have the opportunity to develop their careers to match their potential. We are committed to upholding the International Labour Organisation Declaration on Fundamental Principles and Rights at Work.
4. We are efficient and flexible; we take initiative, and we seek out effective, creative solutions. We believe the best results are achieved when we work together. We are good colleagues; we work hard, support each other, value our differences and strive for our mutual success. We give and receive feedback to help us learn continually new ways to improve.
5. We believe in equal opportunities and equal pay independent from gender.

6. We feel a deep and genuine regard for the safety and well-being of all people, communities and resources, and we respect and treat them with care and consideration. We demonstrate trust and openness. We are good stewards of the environment.
7. We have a philosophy of giving responsibility to individuals within DMH to build business relationships and to develop business. With that responsibility comes the obligation to recognize that your conduct will affect DMH and its reputation and that we all must, in all of our business dealings, comply with the principles contained in this Code of Conduct.
8. You can count on us. We take action, are results-oriented and hold ourselves accountable. We fulfill our commitments.

### **What is expected of me?**

#### *Employee Expectations*

We are all expected to know and adhere to our values, our Code and other company policies, procedures and guidelines that apply to our work, as well as all applicable laws and regulations - regardless in which country we operate.

We must never ignore or try to work around the Code for any reason, even meeting business goals. If you need help understanding our Code or a specific policy, procedure or guideline, you should seek guidance from either your direct superior or in case of need one of the DMH's partners.

Failure to comply with our Code and company policy can have severe consequences for both our company and the people involved. In addition to potentially damaging DMH's reputation, conduct that violates the Code may also violate the law. Violations of our Code or company policies may lead to disciplinary action, up to and including termination of employment. When appropriate, DMH may also refer cases to government authorities, which may result in personal liability for individuals involved.

#### *Additional Expectations for Managers and Superiors*

Following our Code and all applicable laws and regulations is the foundation of our company's continued success and positive reputation. While each of us has a duty to follow our Code, managers and supervisors have an even greater responsibility: you serve as ambassadors for our Code with your team members. You must ensure that the Code is communicated to everyone who works for you, and that they receive appropriate training on the Code and the policies that impact their jobs.

As a manager, you are expected to create an environment that encourages employees to come to you with questions or reports, and address colleague questions and concerns appropriately and in a timely manner.

If you do not know or are unsure of the answer to an employee's question, you should look to your resources to help obtain the answer or talk to one of the partners of DMH.

You must never take any form of retaliatory action against any employee for raising a question or concern, and you must never tolerate retaliatory actions by others.

### **What laws do I need to follow?**

While our Code cannot cover the specific language of every law that applies to DMH's business, you and every agent representing DMH must know, understand and follow the laws and regulations that govern the work you do on the company's behalf.

Remember, laws may vary drastically from one country to the next. We may even be subject to the laws and regulations of multiple countries at once. If you are ever concerned about a conflict between laws and company policies, please contact your superior or one DMH's partners before proceeding. If, after reviewing our Code and any applicable policies, you have questions about the rules that apply to your work, you are expected to raise them with your superior or one DMH's partners.

### **Respect in our workplace – Diversity, Discrimination and Harassment**

It is important that we work together to ensure that our workplace is one of inclusion and acceptance. The diversity of our individual backgrounds, experiences and ways of thinking is an important driver in DMH's success. We must therefore value the diversity of every member of our team.

Should employees face a problem between them and other employees then they should talk to their superiors respectively to one of DMH's partners to find an amicable solution. Such talks will be held in complete confidence and will be treated accordingly.

We each have a responsibility to do our part to create an environment in which our colleagues can grow and succeed. We, and all applicants for employment at DMH, will be evaluated on our qualifications, demonstrated skills and achievements. DMH prohibits any form of unlawful discrimination.

We value diversity and treat employees fairly, providing equal opportunity at all levels of the organization. We prohibit discrimination on the basis of race, color, religion, nationality, religion, gender, age, sexual orientation, disability, ancestry, social origin, marital status, political or other opinion, or any other bias. We do not tolerate any form of racial, sexual or workplace harassment.

Preventing harassment in the workplace is an important aspect of fostering a respectful work environment. While the definition of harassment may vary from one location to another, at DMH it generally refers to unwelcome conduct related to a person's legally protected characteristics that creates a hostile or abusive work environment.

Harassment may be verbal, visual or physical. It may be non-sexual or sexual in nature. It may include many types of conduct, such as insults, abusive language, threats, intimidation, slurs, offensive jokes or visual displays, or unwelcome touching. Each of us is responsible for maintaining a work environment free from any kind of conduct which intimidates or harasses.

### **Compensation and benefits**

DMH ensures that no wage is lower than the applicable legal minimum. DMH does not deduct or withhold pay for disciplinary reasons or force terms and conditions for employment. Compensation paid to employees shall comply with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits.

### **Working hours**

DMH ensures that applicable legal restrictions on working hours are met. The maximum allowable working hours in a week are as defined by national law and the corresponding standards of the International Labour Organisation. Overtime is restricted according to local legal and contractual obligations. Employees have at least one day off each week, apart from exceptional circumstances and for a limited period of time. The work organization provides for rest breaks as necessary, in order not to affect the safety and health of the employees.

### **Prohibition of Child Labour**

DMH does not accept employment of children aged under 15, except where permitted by law but in no case below 14. If an applicable law sets a higher minimum working age or compulsory schooling is to a higher age than 15, it is this limit that applies. General educational and training programs followed by children in schools or other institutions are not included in this limitation. We all must make sure that young employees are protected from performing any work that is likely to be hazardous or to interfere with the child's education or that may be harmful to the child's health, physical, mental, social, spiritual or moral development.

### **Workplace, Health and Safety**

We must all do our part to maintain a healthy and safe workplace for our colleagues and visitors. We strive for achieving zero injuries and zero incidents in our workplace. In pursuit of this goal, we must follow all applicable laws and regulations designed to prevent workplace hazards and promote a safe and healthy work environment. We are all encouraged to contribute to this effort by sharing our ideas and concerns, completing safety observations, providing feedback to colleagues about safe behavior, accepting helpful suggestions for staying safe, and collaborating to develop safe practices. We must never conduct business on DMH's behalf, or ask others to do so, when it cannot be done safely. We need to make our safety and the safety of others a priority at all times. This means we may never work for DMH while under the influence of alcohol, illegal drugs or misused over-the-counter or prescription drugs.

To ensure a safe and healthy workplace, we must also work to prevent acts and threats of violence. Violence has no place at DMH and will not be tolerated, regardless of whether it is against colleagues or visitors to our facilities.

### **Fair Employment Practices**

DMH is committed to honoring the rights of our employees, as well as complying with all applicable wage and hour laws in all areas of the world where we have operations. In addition, DMH expects our business partners to treat their employees with dignity and respect, and follow local employment laws. We will never knowingly use any suppliers who employ or exploit legally underage workers or forced labor. We do not condone such practices.

### **Devices and Privacy**

DMH will provide all employees with the necessary devices (like mobile phones etc.) to handle the work in an orderly fashion.

Unless otherwise provided by applicable law, employees should not expect the information that they maintain using company assets, such as computers, electronic communications systems, lockers, desks and telephone systems, to be private. DMH will observe all local legal requirements in any review of personal information maintained on these assets.

However, employees have to be aware that DMH generally will only concern itself with their personal behavior if it interferes with their job duties or could harm the company or their colleagues.

### **Product Quality and Safety**

Acting with integrity toward our customers and business partners means taking pride in our work and making product quality and safety top priorities.

We trade, develop and produce high-quality, nutritious and safe food and feed products which meet agreed-upon expectations. Maintaining our exceptional quality and safety standards means we must work together to ensure that our products meet or exceed legal and regulatory requirements.

We have detailed management policies and programs that ensure our products meet regulatory requirements and our own quality standards and our customers' needs. These activities also ensure that all products come with documentation for customers to allow safe transport, handling and use.

Our marketing, logistics and product safety functions work closely together with our partners and service providers to ensure that quality and safety requirements are met throughout our supply chains. We ensure that customer enquiries are dealt with in a timely and accurate manner.

We engage with all stakeholders involved with any aspect of our products. We attempt to promote the responsible use and management of these products.

## **Fair Dealing and Fair Competition**

### *Sales and Marketing*

We must always engage in fair and ethical sales and marketing practices.

This means we emphasize the quality of DMH's products and services, and never disparage or discredit our competitors or their products or services. If you are involved in any oral or written statements about competitors, ensure they are fair and factual.

In one word:

1. We are not seeking contact to competitors, neither directly or indirectly.
2. We don't comment in the market on competitors
3. Should we be contacted directly or indirectly by competitor(s) this information must be immediately passed on to one of DMH's partners.
4. There will be no agreements with competitors whatsoever on prices, volumes, customers or suppliers unless it is a clear-cut sale or purchase deal.

### *Competition and Antitrust Laws*

At DMH, we are encouraged to compete aggressively for business and sales opportunities.

However, it is just as important that we compete lawfully and with integrity. Many of the countries where we do business have enacted competition, or "antitrust," laws that regulate how we can compete in the marketplace. These laws aim to stop unfair business practices that restrict competition, ensuring that our customers and the public have an opportunity to buy high-quality goods and services at fair market prices.

Competition laws may vary from one country to the next, and we may be subject to more than one jurisdiction's laws at once. It is important that you know your responsibilities under applicable competition laws wherever you are operating.

At DMH, we are expected to recognize situations that may conflict with competition laws.

When these cases arise, you should seek guidance from your superior or one of DMH's partners before taking further action. It is important to note that violations of these laws can carry criminal penalties for both the individuals involved and for DMH. To ensure that you are acting in compliance with competition laws, be especially careful when interacting with DMH competitors. In particular, avoid any discussions with competitors that could be viewed as an agreement to restrain trade in any way. This is true whether the conversation is written, oral or informal. However, when transacting business with a competitor to serve DMH's legitimate commercial needs or objectives, agreements with that competitor on the specific terms of a transaction are necessary and acceptable.

That exception for discussing transactional terms with competitors is limited.

### **Contact**

In case you need advice please your superior or one of DMH's partners should you have questions.

Competition laws do not merely govern our interactions with competitors. They also prohibit entering into formal or informal agreements with customers, suppliers or other business partners that may unfairly restrict competition or participate in other abusive behavior.

### *Competitor Information*

In the normal course of business, it is not unusual for us to acquire information about other organizations, including competitors.

When properly gathered from legitimate sources, such as customers and the internet or industry journals, this kind of information can be invaluable for purposes of analyzing markets, extending credit or evaluating suppliers. It is natural and proper for us to gather this information in a competitive system. However, there are limits to the manner in which we may acquire and use that information, especially information regarding competitors.

Information about competitive conditions in a market includes information about:

- Prices
- Terms and conditions of sale
- Production and similar matters

We must not gather such information by communicating with representatives of competitors in those markets. Competitors may disclose information on market conditions to us in the context of a legitimate business transaction, so long as the communication of that information is essential to the consideration of the transaction.

### **Protection of Third-Party Information**

At times, our customers, suppliers and other business partners may share confidential information about their operations with DMH. It is our responsibility to use, store and carefully safeguard any such information in a manner that complies with all applicable laws and/or any pertinent agreements. We must take appropriate steps to keep this information secure and make sure it is used only for approved business purposes.

We are also expected to respect third-party intellectual property rights in our daily business activities. This means we must never knowingly infringe on the copyrights, trademarks or patents of others, such as practicing a patented process or using protected material (i.e. by downloading unlicensed software onto company computers or by duplicating, publishing or distributing copyrighted magazine articles). Likewise, it is illegal to download songs, photographs and/or videos from the Internet without consent from the rightful owner.

### **Fair Treatment of Suppliers**

We are committed to dealing fairly with all our suppliers. We choose our suppliers based on legitimate, business-related criteria. This includes quality of products and services, technical excellence and cost, among others. In addition, we never take unfair advantage of our suppliers through manipulation of our position or relationship, concealment of important facts, abuse of confidential information, misrepresentation of material facts or any other unfair dealing practice.

### **Government Customers**

Many countries place strict legal requirements on companies that do business with the government. When selling to, buying from, negotiating with or working with government customers, we must carefully comply with these requirements. These rules are often much stricter and more complex than those that govern our sales to commercial customers. If your work involves government contracts, it is your responsibility to know and follow the particular rules that apply to your work.

### **Conflicts of Interest**

We need to operate with our company's best interests in mind at all times. Decisions related to DMH's business must always be based on the company's objectives and priorities and made by a colleague without a conflict of interest in the decision. A "conflict of interest" is any situation where our personal interests, including those of our family members, friends and associates, could harm our ability to make sound, objective business decisions on DMH's behalf.

Employees should avoid potential conflicts of interest whenever possible because the mere appearance of a conflict may cause an employee's motives to be questioned. Employees may be asked to formally disclose potential conflicts on an annual basis, but the obligation to disclose exists throughout the year. Employees must obtain approval from one of DMH's partners before accepting

officer or director positions with an outside business, including not-for-profit board positions that have received or plan to submit requests for support from DMH.

The following section describes some of the more common situations in which conflicts may arise.

### *Business Gifts and Entertainment*

Business gifts and entertainment are often used to strengthen business relationships. While developing strong working relationships with our customers and business partners is important, we must exercise particular caution when offering or accepting business courtesies. Exchanging gifts and entertainment can result in conflicts of interest. If not handled properly, it may even lead to the appearance of bribery or other improper payments. You may not accept or provide any gift, favor or entertainment if it will obligate or appear to obligate the recipient.

Employees should not accept discounts for personal gain from suppliers and service providers if they are not offered to the general public.

During traditional gift-giving seasons, in areas where it is customary to exchange gifts, employees may exchange gifts with nongovernmental business associations in nominal amounts. However, employees should not request or solicit gifts from any business partners.

Generally, we can offer or accept a gift, favor or entertainment as long as it:

- Does not make the recipient feel obligated or give the appearance of an obligation
- Is a reasonable complement to the business relationship
- Does not exceed generally accepted local business practices
- Is of modest value
- Does not violate local law or the recipient's company's policies
- Is not solicited
- Is infrequent

### *Corporate Opportunities*

In order to make objective business decisions on DMH's behalf, we must never compete with our company. This means we cannot take for ourselves any business or investment opportunities that we discover through our position at DMH or through company property or information. Specifically, you may not personally speculate in agricultural commodities processed by DMH. In addition, you may never help anyone else take such business or investment opportunities for personal gain, including family members and friends.

### *Outside Employment*

DMH understands that we may wish to engage in work outside our company. However, we must always ensure that any outside employment we might hold does not impair our ability to do our work for DMH and does not create a conflict of interest.

### *Financial Interests*

You must avoid doing DMH business with any company in which you have a significant financial interest. In addition, you may not purchase or maintain a significant financial interest in a customer or business partner unless you receive approval from one of DMH's partners. You should always ensure you are able to make DMH business decisions with the company's best interests in mind.

## **Anti-Corruption**

### *Bribery*

DMH prohibits bribery and other forms of improper payments.

This rule applies in all DMH operations, including controlled joint ventures, regardless of where you are doing business or your job level.

Bribery is a criminal offence. It carries severe penalties for companies and severe penalties and disciplinary issues for any officers and employees who are involved in any offence.

DMH's position on the issues of bribery and corruption is clear. The offer, payment, authorizing, soliciting and acceptance of bribes are practices unacceptable to DMH.

DMH's success is founded on a reputation built over many years as being an honest and reliable business partner. Any profit which may result from a business venture improperly obtained will be more than outweighed by the damage done to the long-term business objectives and reputation of DMH.

A "bribe" can be anything of value offered, promised, made or given to obtain or retain business or for an improper business advantage. This includes cash, cash equivalents, gifts, travel expenses, entertainment, services or loans. Never attempt to go around any laws, regulations or company policies by asking a third party to do something that you are prohibited from doing.

If you have any concern that the making or receipt of a payment or the taking of a particular course of action might violate anti-corruption laws or the principles contained in this policy, or if you suspect that violations of corruption laws or this policy may be occurring or are about to occur, you must refer that concern to your superior (provided they are not the subject of your suspicion or query), or one of DMH's partners.

#### *Anti-Corruption Laws*

If your position requires government interaction, you must know and abide by the various anti-corruption laws that apply to our global business activities. We also must ensure that third parties we choose to represent DMH—such as consultants, agents, representatives, subcontractors and joint venture partners—know and abide by these laws when they conduct our business, as the company may be held responsible for their actions.

Under anti-corruption laws around the world and company policy, we may not offer, promise, make or give a bribe or other improper payment (or one that could be reasonably viewed as such) to a government employee. One form of improper payment is a "kickback." Kickbacks are the return of funds already paid or due to be paid as part of a legal contract as a reward for making or fostering business arrangements. "Government employees" has a broad meaning. The term can refer to public officials and employees at any level of government; officials of and candidates for political parties; employees of public international organizations; and employees of entities that are owned or controlled by the government.

#### *Facilitating Payments*

Although facilitating payments may be legal in certain locations where we do business, you must obtain approval from your superior or one of DMH's partners before offering, promising, authorizing or making such a payment. This rule applies no matter how small the requested amount.

Facilitating payments, often referred to as "grease payments," are small payments made to low-level government employees to hasten or secure the performance of routine, non-discretionary official actions.

#### **Trade Controls**

DMH's international trading operations are subject to the laws and regulations of the countries in which we conduct business.

Therefore we must abide by all applicable laws and regulations regarding international trade.

#### **DMH's Assets and Technology**

##### *Confidential DMH Information*

One of our responsibilities is to protect DMH's confidential information. "Confidential information" generally includes all non-public information that may be of use to competitors or could be harmful

to DMH if disclosed. Examples include financial data, pricing information, marketing strategies, costs, technical data, processes, equipment and machinery layout and design, information systems and computer software. This includes information communicated in both written and electronic documents, as well as oral conversations. To ensure that DMH's confidential information is properly protected, none of us may disclose it to anyone outside of DMH except when authorized or legally required to do so. We also cannot discuss this information with colleagues who do not have a business need to know it. Take care not to lose, misplace or leave confidential information (or technologies containing such information) unattended. In addition, never discuss this information where those who do not have a business need to know it might overhear (such as airport terminals, trains, restaurants or company break rooms).

#### *Electronic Communications Systems*

DMH provides many of us access to various electronic communications systems, including computer and phone systems, so that we can do our daily work. We have a duty to always safeguard these systems and the technologies provided us, such as laptops, cell phones, PDAs and software. This means we must each do our part to prevent damage, harm, loss and unauthorized access to these resources. Be sure to follow all security measures and internal controls in place for the resources you use. If you need to use DMH electronic resources, such as computers and phones, for personal use, make sure your use is limited and appropriate. Exercise good judgment, and do not allow your personal use of these resources to interfere with your job duties.

Remember that electronic messages (such as emails, instant messages and text messages) are permanent records of your communications. Electronic communications can be altered and forwarded without your permission. For these reasons, take particular care when drafting any electronic messages on company letterhead or when using DMH resources.

In addition, you must use these systems and technologies in an ethical and lawful manner. Do not download or send inappropriate, sexually explicit, illegal or offensive material via these resources. You should never have an expectation of privacy when using company resources as DMH may monitor your personal use to the extent permitted by local law. However, keep in mind that DMH generally will only concern itself with your use of company assets if it interferes with your job duties or could harm the company or your colleagues.

#### *Social Media and Networking Sites*

Social media and networking websites have changed the way many of us share information. They have created new opportunities for communication and collaboration, but they also create the potential for harm to our company. Social media sites include social networking sites, blogs, photo- and video-sharing sites, forums, chat rooms and others. If your position requires posting on such sites, you must receive permission from either your superior or one of DMH's partners prior to doing so.

In your personal social media interactions you can list DMH as your employer and provide your title, but as with other media, you may not post work-related images or discuss DMH or your work with our company.

#### *Audits and Investigations*

We have a responsibility to cooperate with external and internal auditors, as well as government investigators who are conducting an inspection or review of our company's products or activities. We may never attempt to interfere with or improperly influence their review. Be sure to provide auditors and investigators the information to which they are entitled. If you have any questions about what information a given auditor or investigator is requesting, consult either your superior or one of DMH's partners. If a governmental investigation occurs, location management must contact one of DMH's partners as soon as possible before proceeding.

### **Accurate Books and Records**

It is important for us to maintain accurate and complete books and records. These documents may form the basis for all of our public disclosures and filings, which aim to give our shareholders and the public an accurate view of our company's operations and financial standing. In addition, DMH uses these documents to analyze company operations, produce financial and governmental reports, and make important business decisions. We have a duty to make sure that the information we submit in all company records is complete, accurate and understandable. This includes all of the information we provide in payroll documents, timecards, travel and expense reports, measurement and performance records, customer and supplier records, and design and engineering records. We must never make a false representation in company documents.

### *Records Management*

We have a responsibility to retain DMH business records as long as needed for business purposes, or longer if required by tax, regulatory or other standards. In addition, we need to know when and how to destroy these business records. If you know that documents in your control may be relevant to a lawsuit or government investigation, do not alter, conceal or destroy any of those documents.

### **Environmental Stewardship**

DMH is committed to continuous improvement in protecting the environment. Implementation of this commitment is a primary management objective. Each one of us has a responsibility to support and implement programs and practices which allow DMH to conduct business in an environmentally sound manner. We must understand the potential environmental impacts of our job responsibilities and minimize any environmental risks. No matter our location, we must, at a minimum, comply with all applicable environmental laws or regulations, as well as company requirements.

Our operations are geographically widespread and diverse in nature, including production, processing, storage, transportation and marketing of natural resources and agricultural products. Our potential environmental impacts are specific to different commodity groups or production sites. Throughout our operations, environmental impacts are identified, analyzed and reflected in our planning, management systems and day-to-day activities.

We comply with applicable laws, regulations and other requirements for environmental management. Where these are less stringent than our own standards, we apply our higher standards.

We conserve and protect environmental resources through a broad range of proactive initiatives, which include the efficient use of energy and water, minimizing waste, reducing emissions and protecting biodiversity.

We demonstrate active stewardship of the land, freshwater and biodiversity systems with which we interact. We monitor emissions and dust from our operations and use abatement systems where necessary to ensure responsible management of air quality.

We manage our waste sensibly. We regularly examine the integrity of our facilities to mitigate against the risk of serious incidents.

We acknowledge the increasing societal and regulatory pressure to reduce carbon emissions to address climate change. We work proactively to manage our energy and carbon footprint.