



The family for success



# CODE OF CONDUCT

THE ALMI GROUP CODE OF CONDUCT  
THE FAMILY FOR SUCCESS

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# Foreword

## Everyone offers products: The Almi Group has the Ingredients for your Success

The Almi Group offers safe products in taste, raw materials and functional systems and develops customised total solutions for the food and food supplement industry worldwide.

The Almi Group has been a successful and reliable partner to the international food industry for more than nine decades, providing distinctive spice blends.

As an Austrian family business, we pass on values and experience from generation to generation - they are the basis of our success, which is now visible worldwide. Although we operate all over the world, we are proud of our roots in the heart of Upper Austria.

Regionality is important to us, as it stands for quality and the fulfilment of individual customer wishes. As an industry pioneer with a high willingness to innovate and invest, we not only shape trends, but are also always one step ahead of them. Past developments show that we are on the right track. An incentive for the future to continue to develop without forgetting our past.

This Almi Group Code of Conduct ("The family for success") sets out the group's expectations and principles towards all employees as well as towards all sales partners, dealers, customers, suppliers, consultants and other business partners.

The expectations and principles set out in this Code of Conduct ("The family for success") are based on the applicable national laws and the legal requirements of the European Union, and are composed of globally recognised social and environmental

standards, such as the conventions of the International Labour Organization (ILO), the UN Declaration of Human Rights, the UN Conventions on the Rights of the Child and on the Elimination of All Forms of Discrimination against Women, the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

The ingredients for the Almi Group's success in society are shaped not least by our behaviour. Each and every individual contributes to this through their personality, performance and behaviour.



**Alexander Mittermayr**  
Owner and  
Chief Executive Officer



**Karl Reingruber**  
Chief Operating Officer



**Heinz Mittermayr**  
Chief Executive Officer

## Scope and binding nature - Fundamentals of the Code of Conduct

This Code of Conduct is binding worldwide and for an unlimited period of time. It is aimed at all employees of all Almi Group companies, regardless of their position in the company. Furthermore, the values of this Code of Conduct must also be observed by sales partners, dealers, customers, suppliers, consultants and other business partners.

Managers bear increased responsibility. They are required to make the necessary efforts to live up to the principles and values described in this Code of Conduct and to set an example in particular.

The Almi Group is particularly committed to supporting ethical standards and preventing corrupt behaviour. The prerequisite for this is law-abiding and ethical behaviour. All behaviour and decisions of employees and business partners must be in accordance with this Code of Conduct.

In this endeavour, violations of this Code of Conduct will not be tolerated by the Almi Group and may result in disciplinary and, if necessary, legal action.





## Compliance with laws, binding standards and other guidelines

As an internationally active company, it is not only a legal obligation, but also our aspiration to comply with the legal and official regulations and standards applicable to our products in the countries in which we operate.

Our employees are required to inform themselves about the national and international laws and standards applicable in their area of responsibility and to comply with these without restriction. This also applies to all laws, standards and other regulations of the country in which the employees do business.

Our products comply with European food regulations and Austrian food law. The Almi Group also complies in particular with antitrust and competition law, tax law, labour law, import and export restrictions, customs and sanctions regulations, data protection and environmental protection regulations.

All sales partners, dealers, customers, suppliers, consultants and other business partners must always conduct their business in accordance with national and international regulations, the legal requirements of the European Union and the globally recognised social and ecological standards as set out in the United Nations Guiding Principles on Business and Human Rights (UNGP), the OECD Guidelines for Multinational Enterprises and the core labour standards of the International Labour Organization (ILO). They must keep themselves informed about the current legal situation and, if necessary, immediately implement changes and new laws in their areas of responsibility.



## Fair competition and antitrust law

As a successful partner to the international food industry, the Almi Group acts as a fair market participant in accordance with the applicable competition and antitrust regulations.

All employees are required to adhere strictly to competition and antitrust law and the corresponding internal guidelines.

Antitrust law not only protects the Almi Group's customers, but also protects us from unfair competition. The Almi Group therefore does not participate in price fixing and does not coordinate pricing strategies with competitors. The Almi Group does not exchange any information with competitors that could or may impair fair international business, in particular no secret or market-relevant information such as prices, margins, discounts, calculation methods or payment terms are exchanged.

The Almi Group will not share any markets or customers with any competitor. All employees, managers and the management must exercise particular caution at trade fairs, customer events and meetings in associations.

The Almi Group's competitors are never informed by the Almi Group of planned price adjustments and changes to the terms and conditions. If the Almi Group receives unsolicited confidential information from one of its competitors, this must be rejected with written justification. The Almi Group only comes into contact with competitors for a specific reason. In preparation for a meeting, a clear meeting agenda is defined in advance.

If a competitor makes a proposal to the Almi Group that violates antitrust law, it must be rejected in writing. In any case, the Almi Group must make it clear that, as a law-abiding company, it does not participate in anti-competitive agreements.

## Prohibition of all bribery / corruption

All forms of bribery, kickbacks, corruption, extortion, embezzlement and unethical practices are prohibited at the Almi Group. All employees, distributors, dealers, customers, suppliers, consultants and other business partners must follow a zero-tolerance policy to prevent such behaviour.

Corruption is associated with, among other things, bribes, unauthorised granting or acceptance of advantages, inappropriate acceptance of gifts, benefits (to influence) and illegal price fixing. Furthermore, all other criminal offences, in particular extortion, misappropriation, money laundering, embezzlement and fraud, will not be tolerated.

Attempts at bribery and deception will not be tolerated and will result in the termination of the business relationship. All sales partners, dealers, customers, suppliers, consultants and other business partners are required to establish their own anti-bribery and anti-corruption guidelines. Suppliers shall not take any action that violates or causes the Almi Group to violate any applicable anti-corruption laws or regulations.



## Principles of gift acceptance

In general, no gifts of money may be accepted. Accepting gifts or other benefits not only calls our objectivity into question, but can also open the door to attempts at corruption. This applies in particular to the repeated acceptance of gifts or favours ("sweetening"), even if these are of low value.

That is why we are also vigilant and critical of so-called "small gifts".

We do not accept gifts of money. We undertake to refrain from accepting all personal gifts and invitations that are likely to influence objective decisions in the interests of the company, in particular in the selection of suppliers and in the relationship with business partners.

Low-value promotional gifts, gifts of symbolic value or invitations to occasional local business meals may be accepted. Gifts that are excessive (especially in the run-up to Christmas and the festive season) are collected and distributed to employees according to the occasion (e.g. by means of a raffle).

If it is not possible to refuse a gift that cannot be regarded as a low-value promotional gift or a gift with symbolic value, or to refuse an invitation for reasons of courtesy (e.g. risk of offence or exclusionary circumstances under which the gift was presented), we are required to report this circumstance immediately to a supervisor or the legal department.

Invitations to meals may only be accepted within the limits of normal business hospitality and on condition that they cannot be

construed as undue influence.

Any suspicion of attempted bribery must be reported to a supervisor and the legal department.



## Avoiding conflicts of interest

The Almi Group expects its employees to be loyal to the company.

Almi Group employees are obliged to act in the best interests of the Almi Group and in accordance with the principles of this Code, without allowing themselves to be influenced by personal interests and private relationships. Private interests or relationships that could influence your objective judgement in the professional environment must be disclosed to your supervisor.

However, the Almi Group also expects its sales partners, dealers, customers, suppliers, consultants and other business partners to separate private interests from the interests of the company in a sensitive and responsible manner.

All secondary business activities of employees must be disclosed to the respective supervisor so that they can be documented in the digital personnel file.

All employees must avoid situations in which their personal or financial interests conflict with those of the Almi Group. It is therefore prohibited in particular to acquire an interest in competitors, suppliers or customers or to enter into business relationships with them in a private capacity if this could lead to a conflict of interest. The interests of the Almi Group must not be adversely affected by conflict situations.

Such conflicts of interest can arise in many situations: for example, no employee may accept benefits - in any form whatsoever - that could reasonably be expected to influence business decisions or

transactions of the Almi Group. Any competitive situation with the company must be avoided.

## Human rights - Respectful and appreciative coexistence

Reliability, team spirit, professionalism and personalised service are our top priorities as an Austrian family business. The Almi Group employees know what they are talking about as they know the industry in detail, are experts in their field and can therefore precisely understand the needs of our customers. Respectful and appreciative cooperation is always a priority throughout the Almi Group.

In accordance with the European Convention on Human Rights and the Charter of the United Nations, the entire Almi Group regards human rights as fundamental values that must be respected and observed at all times and in all areas of business dealings.

The Almi Group guarantees that our employees do not discriminate against anyone because of their ethnic origin, skin colour, religion, gender or other legally protected characteristics. We also demand this from our sales partners, dealers, customers, suppliers, consultants and other business partners.

Prohibition of child labour: Child labour is universally prohibited.

Ban on forced labour: All forms of involuntary labour - including forced labour, bonded labour, debt bondage, involuntary or exploitative captivity, slavery, human trafficking or other forms - are prohibited.



## Fair working conditions / health / safety

As a socially responsible employer, the Almi Group considers its employees to be of great value. The Almi Group's personnel policy contributes to offering every employee the opportunity for professional and personal development. Open exchange of opinions, criticism and ideas are encouraged.

It is the qualifications and knowledge of our employees that make us successful; their commitment makes the difference. We therefore support and encourage our employees to help shape the company. Internal guidelines create the framework for transparent, fair and equitable behaviour.

The Almi Group condemns unlawful discrimination or harassment of any kind.

All Almi Group employees are required to ensure a safe and healthy environment. Therefore, the safety regulations and practices (e.g. the current instructions on occupational health and safety and the instructions on behaviour in the event of accidents at work) must be strictly observed. In addition, employees are regularly informed about and trained in applicable health and safety standards and measures. Every new employee must successfully complete appropriate instruction for their position on their first day of work.

The health and satisfaction of its employees has been a top priority for the Almi Group for decades. The Almi Group therefore offers all employees company health promotion programmes and measures to increase employee satisfaction (e.g. company doctor, vaccination campaigns, flexitime agreements, joint company

leisure and cultural activities, etc.).

All companies that have a business relationship with the Almi Group, i.e. our sales partners, dealers, customers, suppliers, consultants and other business partners, also ensure a safe and hygienic working environment that is appropriate to the industry, the specific national regulations and the workforce.

Appropriate measures shall be taken to prevent accidents and damage to health arising out of, connected with or occurring in the course of work by minimising as far as possible and practicable the causes of hazards associated with the working environment.

## Data protection / Intellectual property / Trade secrets

All employees are requested to treat all non-public information, in particular commercial or technical details, but also formulas and mixtures that become known through business relationships with partners, confidentially and not to pass them on to third parties.

Much of the Almi Group's business information is confidential or legally protected, so there is a duty of confidentiality. This does not apply if publication of the information has been authorised by the Almi Group or is mandatory due to laws or regulations.

The confidentiality obligation relates in particular to intellectual property. This includes trade secrets, patents, formulas and developments, trademarks and copyrights, but also business and marketing plans, drafts, business documents, salary data and all other unpublished financial data and reports.

All personal information about employees, applicants, customers, business partners and suppliers as well as other third parties is carefully processed and treated confidentially within the Almi Group in compliance with data protection laws. This information must be protected with the utmost care. Personal data is only processed in accordance with the GDPR and the applicable data protection laws.

The rules of confidentiality also apply to e-mail business transactions. When formulating e-mails, we behave in an appreciative and respectful manner. When using the IT systems, we take intellectual property into account and only use it if a licence or corresponding permission to use is available. Therefore, any kind of software and

shareware may only be installed on the respective computer by the IT representative or with his/her authorisation.

In addition, companies that have a business relationship with the Almi Group, i.e. also our sales partners, dealers, customers, suppliers, consultants and other business partners, must ensure that information and data about our companies, our employees, our applicants or other business partners are protected during and after the termination of the business relationship and may not be made accessible to third parties.



## Sustainability and the environment - Acting with foresight

The Almi Group demonstrates that economic processes and sustainable commitment are not contradictory by acting with foresight. The Almi Group is committed to complying with the applicable environmental protection regulations and standards - for the sake of the environment.

It is often the small actions that make the difference: The aim is to purchase raw materials directly in the region in order to shorten transport routes. Correct waste separation and the right choice of materials for food packaging optimise the ecological footprint. State-of-the-art systems ensure that energy consumption is optimised and that the high expectations of the global market are thus met.

Constant reflection and improvement is our contribution to acting in an ecologically efficient manner. This is how we take responsibility for our descendants.

We also expect this ecological responsibility from the companies that do business with the Almi Group. This means that our sales partners, dealers, customers, suppliers, consultants and other business partners are also required to comply with all applicable laws and international regulations for the protection of the environment.

## Dealing with assets

The Almi Group expects its employees to take responsibility for the assets of the Almi Group. Every employee is obliged to protect the property of the Almi Group against loss, damage, misuse, theft, misappropriation or destruction. Every employee is obliged to inform his or her supervisor immediately of any use of assets contrary to the above.

We also have this expectation towards all companies that have a business relationship with the Almi Group, i.e. also towards our sales partners, dealers, customers, suppliers, consultants and other business partners.

# Dealing with tip-offs

## Fundamentals

It is the responsibility of all employees to be critical and to comply with the provisions of this Almi Group Code of Conduct ("The family for success") in addition to laws, internal guidelines and regulations.

For this reason, we have set up a reporting channel. Any whistleblower can send an e-mail to **whistleblowing@almi.at** to submit their critical reports at any time and place, if desired also using an anonymous fantasy e-mail address.

**BE SPICY, BE CRITICAL!**

## Almi Group Whistleblower System

The Almi Group Whistleblower System: An opportunity to submit a report confidentially and, if desired, completely anonymously.

You can use the whistleblower system to report violations of our Code of Conduct or breaches of the law. Our legal department will treat all information as strictly confidential.

The whistleblower system can be used to report the following grievances or suspected cases in particular:

- Antitrust law (e.g. price fixing or conspicuous competitor contacts),
- Suspected corruption (e.g. bribery payments, unauthorised granting or acceptance of advantages),
- White-collar crime (e.g. fraud, embezzlement or theft),
- Discrimination or sexual harassment.

E-mail address: **whistleblowing@almi.at**



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