



DeLaval Group Code of Business Conduct

## Code of business conduct

### Introduction

The DeLaval Group Code of Business Conduct establishes a set of rules and non-negotiable standards in key areas, which must be followed by all companies and employees within the DeLaval Group. It provides a frame of reference that directs our behaviour and is further supported by specific policies and procedures of the DeLaval Group.

For the purpose of this code, “employees” include all categories of employees at all levels, whether working full-time or part-time, in a permanent or a temporary capacity.

The DeLaval Group is committed to maintaining mutually beneficial relations with its suppliers, customers, and business partners, and expects such stakeholders to adhere to a code of conduct consistent with its own.

### Obeying the Law

The companies and employees of the DeLaval Group are required to comply with all applicable laws and regulations of the countries and jurisdictions in which they operate and work.

### Workplace

The companies within the DeLaval Group recruit, employ, and promote employees on the sole basis of qualifications and abilities, and do not tolerate any kind of discrimination, harassment, or abuse in the workplace.

The DeLaval Group is committed to a working environment that promotes diversity, inclusion, equal opportunity, and respect for human rights.

It is also committed to ensuring safe and healthy working conditions and to supporting the physical and mental well-being of its employees.

The DeLaval Group recognises the rights to freedom of association.

### Conflict of Interest

Employees of the DeLaval Group must not engage in personal and/ or financial activities, relationships or interests that could conflict or risk conflicting with the interests of the Tetra Laval Group.

### Confidentiality and Security

The DeLaval Group requires all employees to maintain the prescribed level of confidentiality. Employees working in positions of special responsibility are required to sign non-competition agreements. The employees of the DeLaval Group must ensure that all assets (including intellectual property rights) and information held by the group (including information related to the group companies, its business counterparts, and individuals) is adequately safeguarded at all times.

### **Environmental Impact**

The DeLaval Group is committed to making continuous improvements in the management of the environmental impact of its own operations as well as the value chains in which the DeLaval Group operates.

The group integrates environmental considerations into management decisions, investments, policies, programmes, and practices across the business, reporting on environmental performance according to the prevailing regulations and standards.

### **Human Rights**

The DeLaval Group respects the UN Guiding Principles on Business and Human Rights.

### **Financial and Non-Financial Reporting**

Financial and non-financial reporting is made where required in accordance with the applicable laws and regulations.

The accounting records and supporting documents of the DeLaval Group must accurately describe and reflect the nature of the underlying transactions.

Underlying records, required materiality assessments and reporting processes must ensure the effective control and relevance of such reporting.

All reporting made on a voluntary basis should be in accordance with the relevant policies and procedures.

### **Authorisation**

The employees of the DeLaval Group work within a system of delegated authorisation in accordance with their respective roles and responsibilities. The DeLaval Group follows a joint approval rule for all documents and other commitments with material effect, including payments.

### **Anti-Corruption**

The employees and companies of the DeLaval Group, and others working on behalf of the group, must not offer, pay, request, or accept a bribe including the contribution or commitment of a

financial nature or effect or ask any customer or supplier to offer, pay, request, or accept a bribe. The direct or indirect offer, payment, request for or acceptance of bribes or transfer of value in any form, such as excessive entertainment, favours, or gratuities, whether the other party is a business contact or a representative of an official body, is prohibited.

Any demand for, or offer of, a bribe in whatever form to any employee of the DeLaval Group must be rejected and reported immediately to management.

### **Compliance, Monitoring and Reporting**

The DeLaval Group is committed to taking a proactive approach across its own activities and business relationships, applying appropriate due diligence in the implementation of this code.

To ensure adherence to this code, the DeLaval Group will establish and follow a set of controls including policies, procedures, processes, and guidelines, where relevant.

It is the responsibility of management to ensure that the requirements contained in this code are communicated to and observed by all employees and companies of the DeLaval Group, and where applicable, with external stakeholders.

Any deviation from this code or supporting policies must be reported immediately to management. Employees are encouraged to voice and report concerns to management and can use the whistle-blowing channel to raise a complaint of actual or suspected non-compliance with the DeLaval Group Code of Business Conduct.

Employees will not be penalised for any loss of business resulting from adherence to this code, or for reporting any actual or suspected breaches of the code.