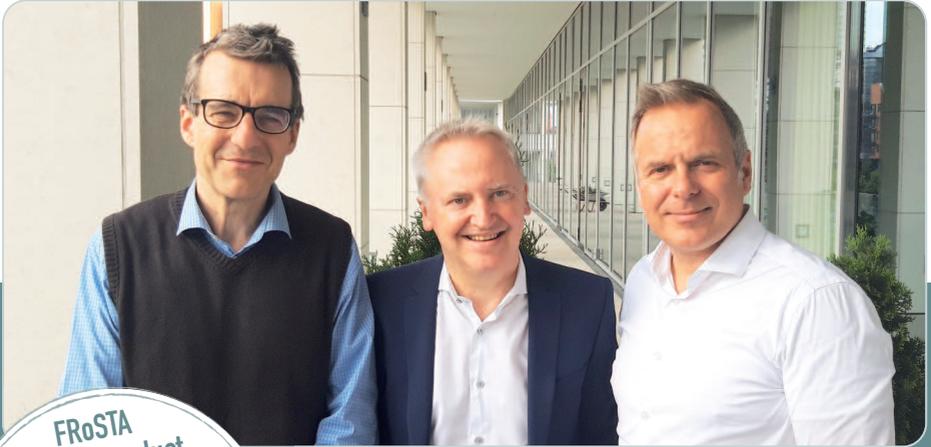


FROSTA Code of Conduct



„Compliance is very important for us. We are expressly committed to fair competition and obedience with all applicable national and international laws. We do not tolerate any form of corruption, bribery or price fixing. In addition, we attach the highest importance to ensuring that FROSTA does not do business that is influenced or brought about in any way by illegal practices. Furthermore, we are very proud that people

from many different countries and cultures work with us. We see this as a great enrichment for all of us. We do not except any form of discrimination, and we take consistent action against it.”

Felix Ahlers

Maik Busse

Hinnerk Ehlers



INTRODUCTION



» **AS INDEPENDENT CHALLENGER
WE SET THE BENCHMARK FOR FOOD.**

» RULES

Our strategy and values create a solid frame for our daily cooperation. But our Code of Conduct is one step ahead: it describes rules being mandatory for us in cooperation with colleagues and all other partners outside FROSTA. Moreover it creates clear limits being respected without exceptions and describes how we deal with excesses. FROSTA AG as company and all its employees are bound by this Code of Conduct and each employee is responsible that we are measured against these rules at anytime.

How we behave correctly is not always easy to decide. If in doubt, we should refrain from doing anything that could damage the good reputation of FROSTA AG. We want to put the wellbeing of FROSTA AG before our own advantage and always behave honestly. If you have any questions, please contact your supervisor or the Compliance Coordinator.

We offer support in cases of doubt

If employees are unsure about the rules of the Code of Conduct or the correct behaviour of a particular person, the supervisor, the workers' council and the Compliance Coordinator are available.



DIRECT CONTACT COMPLIANCE COORDINATOR:
compliance@frosta.com



FOR WHISTLEBLOWING SYSTEM
click here! 





HOW WE RUN OUR BUSINESS

We commit ourselves to follow applicable law, binding norms and directives

» NORMS

FRoSTA AG as company and all our employees follow in all business decisions and actions the applicable laws and all relevant regulations at local site and abroad. We also comply with binding standards and internal guidelines (Group Policies (GP)), which are available to all employees on the intranet.

We are committed to a fair competition

FRoSTA AG concentrates its strategy on its own strengths: The quality of products, services and employees as well as the tradition of being an honest company.

We want to convince our customers and suppliers of being a fair partner acting without any non-compliant behavior on the market. Especially agreements with other competitors and abuses are strictly forbidden.



» FAIRNESS

We do not accept any kind of bribery and corruption

» INCORRUPTIBILITY

FRoSTA AG does not accept bribery and corrupt behavior in any way. Employees may not grant business partners,

private individuals or government agencies and institutions any services to obtain a business advantage (active bribery) or accept services from third parties for the granting of a benefit or preferential treatment (passive bribery). Similarly, employees may not misuse the responsibilities granted in the course of their work for their own benefit or for the benefit of third parties.



Invitations for dinner and small gifts may only be accepted up to a value of € 50.00. This amount is fixed so that neither materially nor in form and scope the appearance of a possible obligation may arise.

We avoid conflicts of interest

In general, we at FRoSTA AG want to avoid that employees get into situations that could lead to a conflict between their own interests or family and personal ties and the interests of the company. These include, for example, business relationships with related parties or activities and connections that compete with the tasks at FRoSTA AG.

» SOLUTION ORIENTATED

Employees are obliged to inform their supervisor or the Compliance Coordinator in the event of a possible conflict of interest and to find a mutually appropriate solution.



We protect confidential company information and assets

FRoSTA AG has its own techniques and knowledge in some areas, which are essential for our success in the market. Information about this and other confidential information about our business, our employees and external partners are accessible to employees within our company only as far as their tasks require. Furthermore, they must be treated confidentially both internally and vis-à-vis third parties. In the same way, we protect intellectual property and confidential information brought to our attention in the course of our cooperation with partners.



All employees use work equipment, facilities, devices and other assets of the company carefully and only within the scope of their work. With our annual publication obligation, we ensure that FRoSTA AG's business processes and assets can be properly audited and that they are transparent for shareholders and the public.

We are responsible for what we do or not do.



» PROTECTION AND TRANSPARENCY



HOW WE DEAL WITH EACH OTHER IN OUR COMPANY

We treat each other with respect and without discrimination



FROSTA AG is a liberal company in which the human dignity and personal rights of all employees are respected.

» RESPECT

We expect all employees, regardless of age, gender, nationality, ethnicity, religion, political opinion or sexual orientation, to meet politely, respectfully and without prejudice and to work together.

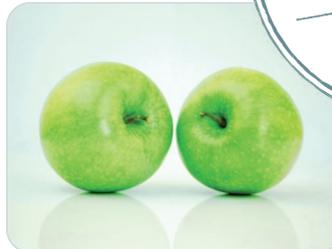
Mobbing and harassment of any kind will not be tolerated, even if it takes place outside the workplace or working hours.

We protect the safety and health of our employees

» SAFETY

When designing work processes and workplaces, FROSTA AG attaches great importance to ensuring that the safety and health of all employees are protected. In this respect, we rely on training

and prevention. Employees are requested to avoid dangerous working conditions or circumstances that pose potential health risks and to report them immediately.



HOW WE DESIGN THE RELATIONSHIP WITH OUR CUSTOMERS

We offer our customers excellent products and excellent services

Close cooperation with our customers and within the entire organization is particularly important to us. Simple workflows and a focus on the essentials increase our efficiency. In addition, sustainability and environmental protection are the basis of our business.



» CLOSENESS TO CUSTOMERS

WHAT WE EXPECT FROM OUR SUPPLIERS

We expect quality, hygiene and environmental awareness from our suppliers at the highest stage within all levels of the company

» RESPONSIBILITY

It is not only important that the employees of our suppliers have internalized this behavior,

but also that it is sustainably implemented in their daily actions. Requirement for starting cooperation with FRoSTA is to have IFS/BRC (food safety) system. In addition we prefer partners with an environmental management system (e.g. ISO 50 001). Regular audits and onsite visits by FRoSTA employees ensure that the standards are met.

We make specific agreements and stand to them.



We expect our suppliers to comply with ethical and social standards

FRoSTA AG has drawn up a Code of Conduct for its suppliers based on the conventions of the International Labor Organization (ILO) and the Business Social Compliance Initiative (BSCI).

Furthermore, we expect suppliers from BSCI risk countries to be certified according to an internationally recognized social standard (e.g. SA 8000, SMETA).



» ETHICS

HOW WE PROTECT THE RIGHTS OF OUR SHAREHOLDERS

We adhere to the principles of good corporate governance

» INCREASE IN VALUE

The Supervisory Board and Management Board of FRoSTA AG are committed to this responsible, transparent and value-enhancing corporate management

and control. We see corporate governance as an ongoing process to improve management and control in the light of new experiences and regulations as well as evolving national and international standards.



HOW WE BEHAVE AS PART OF THE SOCIETY

We are committed – regionally and internationally

Since 2015 FRoSTA AG donates annually 2 % of the total dividend for social projects, both in the vicinity of our locations and in the countries of origin of our ingredients. We are convinced that we bear responsibility for both.

The special thing about this is that all FRoSTA employees are encouraged via our intranet to propose charitable projects in the region.



» SOCIAL ENGAGEMENT

HOW WE OPERATE SUSTAINABLY

We adhere to the requirements of our Purity Command for the FRoSTA brand



Our ingredients are the basis for the quality and sustainability of our products. With the requirements of our Purity Command for the FRoSTA brand, we formulate standards that go far beyond the legal requirements.

We process only certified fish and seafood

Since 2011 we only use fish and seafood with MSC certification, since 2016 also ASC-certified shrimp.

We determine that our Alaska Pollock are caught on the high seas, immediately filleted and deep-frozen.



» QUALITY & SUSTAINABILITY

We take care of details



The rearing conditions of the chicken meat processed by us are specified in detail, from stocking density and feeding up to slaughter age. We agree with our contract farmers on the seed to be used, limit the use of crop protection products and ensure traceability back to the field

» CONTROL OF ORIGIN

We want to conserve natural resources

Since our company was founded, we have been concerned with the question of how to preserve the natural fish population for future generations. Climate change is just as important to us. For this reason, we have been calculating and publishing the CO₂-footprint of all FROSTA products since 2008. We set ourselves annual targets to continuously reduce our CO₂e-emissions.

We set
the benchmark.



We also take climate and environmental protection into account in our packaging, the choice of our company vehicles and business trips.

The goals and activities are described in our Sustainability Report and updated regularly.

» CLIMATE AND ENVIRONMENTAL PROTECTION



HOW WE LIVE OUR CODE OF CONDUCT

We promote knowledge and understanding of the rules of our Code of Conduct

All employees will be informed about the Code of Conduct after it comes into effect and when they join the company. Supervisors regularly discuss the points that are important for their area of responsibility and promote understanding of the Code's application. Supervisors and the Compliance Coordinator are available for questions and suggestions.



» ORIENTATION

We take action against violations and support those who report deviations

Supervisors and the Compliance Coordinator are required to investigate all violations and hints, clarify them with those concerned and, if necessary, determine disciplinary measures with the respective supervisors, even if they were made anonymously. This also applies to any information provided by employees regarding possible violations by colleagues or superiors. Upon request, the Compliance Coordinator will maintain the anonymity of the whistleblower and protect him or her from possible pressure from other persons involved.

The violation of this Code of Conduct can damage the integrity of FROSTA AG. For this reason, the internal auditors check within the framework of their audits whether there are any indications of misconduct.

We communicate open and clear.



» SENSE OF DUTY

Let's be honest. We stand by it!



For a better readability we are using in this Code of Conduct the common masculine form with personnel nouns and pronouns. This does not mean a discrimination of females but was done due to simplify the text as being gender-neutral.

