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1. Words from the CEO

Cloetta’s vision is to be the most admired satisfier of Munchy Moments. Admired not only for our high quality products and attractive brands, but also for how we in a responsible way act in relation to the world around us.

All Cloetta employees share a responsibility for how we act in relation to our customers, our consumers, our owners, our suppliers and co-workers. We, as a company, must always act in a way that demonstrates that we deserve the stakeholders’ confidence and appreciation.

This Code of Conduct is a set of ethical guidelines for how we do business. It builds on Cloetta’s core values: Focus, Teamplay, Passion and Pride. The Code takes the entire value chain into consideration and provides guidance to how to live up to our reputation in practice. Therefore, I expect you as a co-worker to accept your share of our joint responsibility.

We continuously strive to improve in the field of corporate responsibility. Consequently, this Code of Conduct will be a document which will evolve together with our company.

In addition to our corporate responsibility, we have a personal responsibility. We should always behave and act in a way that allows us to take pride in our achievements, our company and our industry. That, at the end of the day, is what it takes to become a successful business in the long run. To be guided by your values and take responsibility for your actions.

Henri de Sauvage Nolting

President and CEO

2. Introduction

The Cloetta Code of Conduct applies to all of our activities in all markets and countries. The principles outlined in this document apply to our relationships with employees, customers, consumers, suppliers, competitors, official authorities and Non Governmental Organisations (NGO).

The Principles in the Cloetta Code of Conduct are consistent with the Universal Declaration of Human Rights*, International Labour Organisation (ILO) Conventions**, United Nations Global Compact*** and the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises****. The Cloetta Code of Conduct also takes into account branch-specific agreements such as the International Chamber of Commerce’s (ICC) framework for responsible food and beverage communications***** and the European Brands Association*****.

Besides this Code of Conduct Cloetta also has a number of policies that governs how we do business with respect to different topics; Authorisation framework, Anti bribery and corruption, Communication, Finance, Fraud and whistleblowing, HR, IFRS accounting, Insider trading, Internal control framework and Trade control.

* <http://www.un.org/en/documents/udhr/index.shtml>

** <http://www.ilo.org/global/lang--en/index.htm>

*** <http://unglobalcompact.org/>

**** <http://www.oecd.org/>

***** <http://www.iccwbo.org/>

***** <http://www.aim.be>



3. Cloetta Day by Day

None of Cloetta's products, loved and consumed by people throughout the world, would have reached the market were it not for the people working for and with us. Because we spend so much time together and influence each other's everyday lives, we believe it is vitally important to have clear guidelines about mutual respect and common values.

- Cloetta's business is guided by our basic values and standards: Focus, Teamplay, Passion and Pride.

- (i) Focus is about doing the fundamentals with self-confidence, ambition and a "will do" attitude.

Focus means continuous, diligent work across the essential parts of our business. We will only be successful by focusing and delivering on prioritised activities. We therefore treasure the ability to be a role model in execution, consistently being practical and fact-based, creating clarity, setting priorities, making consistent choices and always having a sense of urgency, speed, drive and discipline as well as the agility to change and adapt when required. Blended with a "will do" mentality, built on self-confidence, ambition and realism. Focus brings both success and the admiration of the competition.

- (ii) Teamplay is about mutual responsibility: doing your part and supporting each other.

Teamplay is based on both individual and mutual responsibilities and mutual support for one another. It extends beyond Cloetta, reflecting in the way we aspire to cooperate with our external stakeholders, customers and suppliers. We therefore treasure the ability to understand value and respect people, to address each other in a creative, open and transparent way, to communicate with honesty and without fear and to share knowledge and learn together. Teamplay manifests itself in cross-functional cooperation, shared learning and together acting as "One Cloetta".

- (iii) Passion is about "going the extra mile", being positive and having fun.

Passion is at the core of our business and characterises all of our actions. It releases the energy and inspiration that provide us with the drive to develop, produce and market great products that, in turn, make our customers and consumers as passionate about them as we are. It feeds the drive to take ownership, to realise goals and to win. We therefore treasure the ability to inspire and motivate, to see change as an opportunity, to go the extra mile, and to be positive and to have fun. Passion manifests itself in the way we understand the business, deal with customers, help each other to succeed and communicate about Cloetta.

- (iv) Pride is about being proud of our company, our brands, our products and our personal contribution.

Pride is the driving force that motivates Cloetta's employees to perform to the best of their ability and to take ownership of the company's direction. It is about pride in both your own and your colleagues' contribution to the company, its brands and its products. Pride is fuelled by the employees' confidence and belief in Cloetta as a company and as an employer. This is based on a safe and sustainable working environment and a working relationship based on mutual trust. We nurture a company culture that empowers people with insight into our business goals and vision, so that everyone feels engaged and committed to where we are headed as a company. Open lines of communication encourage employees to take responsibility for their jobs and take pride in what they do.



- Cloetta undertakes to comply with all of the agreements included in the Fundamental Social Principles contained in the UN International Labour Organisation (ILO) Conventions. In day-to-day life, Cloetta especially focuses on:
 - (i) equality and discrimination
 - (ii) freedom of association and the right to collective bargaining
 - (iii) safety and health at work
 - (iv) working hours
- Cloetta complies with the laws and regulations of the countries in which we operate and to respect local norms and values.
- Cloetta does not comment on politics or make political statements in the markets where we operate. Neither do we make political donations. However, we do engage in dialogue on national and international level regarding regulations and processes that affect our business.
- Cloetta strives towards a reciprocal relationship of trust and respect between the company and our employees. We therefore urge employees to take special note of:
 - (i) Behaviour which might lead to misuse of company property and brands.
 - (ii) Behaviour which might lead to misuse of information.
 - (iii) Behaviour which might lead to corruption.
 - (iv) Behaviour which may lead to unwanted intimacy and harassment
 - (v) Behaviour which may serve to intimidate other employees.
- Employees who notice behaviour that is not in line with the Cloetta Code of Conduct shall report it to their manager, HR-manager or by using the anonymous Whistleblowing reporting channel.
- As a company with a long, stable presence in many countries, Cloetta strives to offer employees opportunities for cultural and work life exchange within the natural boundaries of our business.

4. From raw material to loved brands

Cloetta's supply chain is complex and involves many different stakeholders. We believe it is important to have a dialogue with suppliers, customers and consumers along the way from primary source to end consumer. As the main co-ordinator in our supply chain, we know that we hold the primary responsibility for the road to market of each product. We respect the significance of this fact and pay special attention to the aspects listed below.

- Cloetta strives to offer attractive and safe products of consistently superior quality.
- Cloetta undertakes to comply with all of the agreements included as Fundamental Social Principles in the UN International Labour Organisation (ILO) Conventions. Cloetta employs the same principles in our relationship to suppliers. The areas listed below are of special importance to Cloetta:
 - (i) child labour
 - (ii) forced labour
 - (iii) equality and discrimination
 - (iv) freedom of association and the right to collective bargaining
 - (v) work safety and health
 - (vi) working hours
 - (vii) remuneration



- Cloetta complies with the laws and regulations of the countries in which we operate and respects local norms and values.
- Cloetta strives to ensure that suppliers comply with all applicable laws and regulations in providing goods and services to Cloetta.
- Cloetta strictly prohibits the granting of hidden, direct or indirect payments or benefits to customers or by suppliers. Cloetta also renounces the formation of cartels or any other forms of association of firms or individuals for the purpose of exerting some form of restrictive or monopolistic influence on the market.
- Suppliers are expected to certify their compliance with the Cloetta Supplier Guiding Principles at Cloetta's request and to authorise Cloetta and its designated agents (including any third parties) to engage in monitoring activities, including unannounced on-site inspections.
- Cloetta continuously works to update our goals and ensure a responsible approach to the entire supply chain.

5. Our content commitment

Cloetta works with consumer products. We are thereby regulated by a number of national and international policies in terms of content and quality. Nonetheless, we feel it is important to take our responsibility one step further. Cloetta therefore strives to be at the forefront of research and innovation in offering high quality goods to the market. Listed below are some of the methods by which we do this.

- Our success is based on the quality of our products. Cloetta strives to continuously update our offering in order to meet consumer demands for quality and taste and to further develop our business.
- Cloetta constantly takes into account new findings of the scientific community in order to find new and better ingredients and be able to offer high quality products to the market.
- Cloetta keeps a close watch on the progress of scientific research in order to increase its use of natural ingredients.
- Cloetta has the long-term goal of offering a product range with *No Artificial Flavours* and *No Artificial Colours* ("NAFNAC").
- Cloetta wants to make a valuable and sustainable contribution to the development and marketing of better for you confectionary by maintaining a close relationship to pioneering research and high quality production. In this regard, Cloetta also pays close attention to the principles outlined in the OECD Guidelines for Multinational Enterprises.
- Cloetta works in accordance with the principles outlined by the European Brands Association (AIM) and the OECD Guidelines for Multinational Enterprises. Cloetta therefore:
 - (i) Strives to establish an active dialogue with consumers, their representatives and other stakeholders in order to strengthen the dynamic relationship between brands and consumers.
 - (ii) Co-operates fully and in a transparent manner with public authorities in matters related to our products and production.
 - (iii) Recognises our responsibility to take into account wider societal interests in our contact with consumers, especially those who are under age.
 - (iv) Commits to communicate in a manner that enables consumers to make informed purchasing decisions and, in particular, recognises that children form an audience possessing a more limited



capacity to assess information in advertising, in accordance with the ICC framework for responsible food and beverage communications.

- (v) Recognises the special circumstances surrounding consumer contact via digital channels, especially in relation to children, and our responsibility in these contacts.

6. The Cloetta Footprint

Global environmental concerns are of growing interest and importance to people around the world, including us at Cloetta. With business activities in many different countries, we try to bring a sustainable perspective wherever we are. Listed below are some of the methods by which we do this.

- Cloetta acts in compliance with the environmental rules and regulations in the countries in which we operate.
- In addition to regulatory compliance, Cloetta promotes measures that take into account the protection of resources, the environment and nature. Our ambition is to help minimise the negative impact of our activities on the natural environment.
- Cloetta's long-term ambition is to continuously strengthen our environmental commitment and improve the management of our activities. We are especially committed to long-term investments to reduce our environmental footprint.
- Cloetta aims to supply appropriate information and communication in order to ensure comprehensive internal and external understanding of our commitment to the local and global environment.
- Cloetta has internal goals for how to reach different target levels in relation to our environmental footprint. These goals are continuously updated to meet an increasingly ambitious standard.

7. Cloetta Supports

Cloetta supports a number of different projects in the markets where we are present. The specific nature of these projects varies over time and geographical boundaries. There are, however, some common factors which are always important for us to keep in mind as we evaluate which projects to support.

- Cloetta aims to act as a responsible member of the communities we operate in and to adopt an open and listening approach to surrounding stakeholders. Our overarching ambition in these efforts is to promote *An Active and Healthy Lifestyle*.
- We believe that *An Active and Healthy Lifestyle* is a cornerstone that supports well-being among citizens and thereby enables a positive business climate. As a consumer goods company we see our role in this as especially important.
- Cloetta runs a variety of projects along these lines in the different countries where we operate. We constantly strive to become more engaged in the local community and to further develop our project portfolio.
