



CODE OF CONDUCT

SEPTEMBER 2018

CONTACT INFORMATION

Olenex is a Joint Venture between Wilmar and ADM. Olenex has engaged ADM's Compliance Department to provide Compliance-related services to Olenex.

For Questions regarding this Policy please contact:

EMAIL PHONE

ComplianceOfficeHamburg@adm.com
+49 40 3013-754

THE OLENEX ALERTLINE

Reports are received - 24 hours a day - by an independent, third-party vendor.

WEB PHONE Germany

olenex.alertline.com

Dial first
0800-225-5288
then
844-303-0233

Netherlands 0800-3131102

Olenex will never tolerate retaliation for any concern reported in good faith (honest, sincere and complete to the best of your knowledge). Olenex encourages all colleagues to speak up when we suspect unethical activity or violations of company policy, regulations or the law may have occurred.





INTRODUCTION TO OUR CODE OF CONDUCT

WHY DO WE HAVE A CODE?

We have a Code of Conduct to show us how to make sound decisions and to illustrate proper actions for conducting OLENEX business. Our Code prescribes the moral and ethical standards of behavior that are expected from all OLENEX employees when doing business on behalf of the company.

WHAT IS THE SCOPE OF OUR CODE?

Our Code applies to all of us, employees, officers, directors and parent companies while providing services to OLENEX. Also, when working on our behalf, we expect our business partners, agents, suppliers and consultants to act in accordance with the principles of our Code.

WHAT IS EXPECTED OF ME?

All employees are expected to know and follow our Code and other company regardless of where they are located. In case of questions or concerns, please refer the Board of Management or ADM's Compliance Department. Additionally, we expect managers and supervisors to conduct themselves in the spirit as well as the letter of the Code and to foster an ethical and positive work environment. Retaliation against any employee for raising a question or concern is absolutely prohibited.

WHAT LAWS DO I NEED TO FOLLOW?

Our Code and applicable policies cannot cover every law that applies to OLENEX business.

Therefore, employees and business partners must know, understand and follow the laws and regulations that govern the work done on OLENEX's behalf.

Law may vary drastically from one country to the next and OLENEX may even be subject to the laws and regulations of multiple countries at once. If you have any question please contact ADM's Compliance Department.

WHAT ARE THE CONSEQUENCES OF CODE VIOLATIONS?

Anyone who violates OLENEX's Code or applicable policies will be subject to disciplinary action, up to and including termination. All discipline will be applied fairly and in accordance with local law. Additionally, legal violations may subject OLENEX and the individuals involved to criminal and/or civil penalties.





ETHICS WITH RESPECT TO OUR EMPLOYEES

DIVERSITY

We value diversity. Each member of our company provides different experiences and ways of thinking that contribute to the success of OLENEX.

DISCRIMINATION

We do not tolerate discrimination. We conduct ourselves as an equal opportunity employer and we don't discriminate on the basis of race, color, religion, sex, disability, age, sexual orientation, national origin and marital status. All applicants and employees will be evaluated on qualifications, demonstrated skills and achievement. No employment related decisions (such as hiring, promotion and salary decisions) can be based on any legally protected characteristic.

HARASSMENT

We do not tolerate harassment in the workplace. Any verbal, visual or physical conduct, sexual or non-sexual in nature that creates a hostile, intimidating or abusive work environment for a person is prohibited.

HEALTHY AND SAFE WORKPLACE

We maintain a healthy and safe workplace for our employees and visitors. We must follow all applicable laws and regulations designed to prevent workplace hazards and promote a safe and healthy work environment. Violence or drink or substance abuse has no place at OLENEX and will not be tolerated.

FAIR EMPLOYMENT PRACTICES

We follow fair employment practices. We comply with all labor laws in all of our locations and we expect our business partners to do the same. We will never knowingly use any suppliers who employ or exploit legally underage workers or forced labor.

DATA PRIVACY LAWS

We follow applicable data privacy laws to the storage, handling, collection and use of employee personal information.





ETHICS WITH RESPECT TO OUR BUSINESS PARTNERS AND CUSTOMERS

FAIR & ETHICAL SALES / MARKETING PRACTICES

We must always engage in fair and ethical sales and marketing practices. This means we emphasize the quality of OLENEX's products and services, and never denigrate or discredit our competitors or their products or services.

LONG-TERM RELATIONSHIP

We look at each business partner and customer as a potential long-term relationship for our Company and endeavor to earn their loyalty through quality service and experiences. We do not solicit or offer improper gifts, entertainment or payments to win business. For specific guidance on this matter, refer to *Olenex Anti-Corruption Policy*.

COMPETITION AND ANTITRUST LAWS

We are expected to recognize situations that may conflict with competition and antitrust laws. We do not enter into formal or informal agreements with customers, suppliers or other business partners that may unfairly restrict competition as well as other abusive behavior by a dominant seller or buyer. When the case arises, you should seek guidance from ADM's Compliance Department before taking further action. For specific guidance on this matter, refer to *Olenex Competition Law Guidelines*.

COMPETITOR INFORMATION

We gather competitor information from legitimate open sources, such as customers and industry journals, in order to analyse markets, extend credit or evaluate suppliers. We must not gather such information by communicating with representatives of competitors in those markets.

THIRD-PARTY CONFIDENTIAL INFORMATION

We protect Third-Party confidential information entrusted to us in the normal course of business. We must take appropriate steps to keep this information secure and make sure it is used only for approved business purposes.

THIRD-PARTY INTELLECTUAL PROPERTY RIGHTS

We respect Third-Party intellectual property rights in our daily business activities. Therefore, we must never knowingly infringe on copyrights, trademarks or patents of others.

FAIR TREATMENT OF SUPPLIERS

We promote the fair treatment of suppliers, choosing them based on legitimate, business-related criteria like quality and price of products and services, without favoritism.





ETHICS WITH RESPECT TO OUR BUSINESS PARTNERS AND CUSTOMERS

GOVERNMENT CUSTOMERS

When dealing with government customers, we must carefully comply with strict local legal requirements. Please contact ADM's Compliance Department for advice in dealing with this type of customers and refer to Olenex Anti-Corruption Policy.

TRADE RESTRICTIONS

We must comply with all trade restrictions that apply to international trading activities, including all applicable import and export controls. Please refer to Olenex Trade Sanctions Policy and for specific rules on this subject.

ETHICS WITH RESPECT TO OUR OWNERS

CONFLICT OF INTEREST

We make our decisions based on OLENEX's objectives and priorities, avoiding any conflict of interest. A "conflict of interest" is any situation where an employee's personal interest, including those of a family member, friend or associate, hinders the ability to make a sound and objective business decision on behalf of OLENEX. Please contact *ADM's Compliance Department* for further instructions on how to deal with this kind of situations.

BRIBERY & OTHER FORMS OF IMPROPER PAYMENTS

OLENEX prohibits bribery and other forms of improper payments, including the so-called "facilitation payments".

This rule applies in all locations and job levels as this is a crime under international and local anti-corruption laws. A "bribe" is

anything of value offered, promised, given to any person (government official or commercial third party) in order to obtain or retain business or for an improper business advantage. A "facilitation payment" is a small payment usually made to a low-level government employee to speed or secure the performance of a routine, non-discretionary official action. Never attempt to circumvent any laws, regulations and or Company guidelines by asking a third party to do something that you are prohibited from doing. *Refer to Olenex Anti-Corruption Policy* where you will find specific rules and instructions.

Always contact *ADM's Compliance Department* when faced with such a situation as any violation of anti-corruption laws will carry criminal and/or civil penalties not only for OLENEX but also for the individuals involved.





OLENEX CONFIDENTIAL INFORMATION

We protect OLENEX's confidential information (consider as such all non-public information that may be of use to competitors or could be harmful to OLENEX if disclosed) communicated in both written and electronic format, as well as verbal conversations.

We must not disclose such information outside of OLENEX except when authorized or legally required to do so.

We cannot discuss this information with colleagues who do not have a business need to know. We never discuss or leave this information where those who do not have a business need to know might hear or see it (such as airport lounges, trains, restaurants).

OLENEX has the right to any materials employees create on Company's time

or within the scope of their job duties (intellectual property). This applies even after the employment relation at OLENEX ends.

We have a duty to make sure that the information we submit in all Company books and records is complete, fair and accurate and which, in reasonable detail, accurately and fairly reflect the transactions and dispositions of OLENEX's assets and transactions.

Employees must not use "insider information" (information that is not generally available to the investing public) obtained as a result of his employment with OLENEX in order to trade shares in the company to which the information refers.

This constitutes insider trading and it's prohibited by law.

ETHICS WITH RESPECT TO OUR COMMUNITIES

PROTECTING THE ENVIRONMENT

OLENEX is committed to protecting the environment by implementing programs and practices which allows us to do business in an environmental responsible manner. We expect the same commitment from our Third Parties and suppliers regarding environmentally and socially responsible business and labor practices.

CIVIC, CHARITABLE & VOLUNTEER CONTRIBUTIONS

We support the communities we do business in through civic, charitable and volunteer contributions.

All political contributions must be pre-approved by the Board of Management without exception and must be allowed by applicable local law.



www.olenex.com

