



**BUSINESS
PRINCIPLES**

December 2021



Founded in 1920, we are a merchant specialized in Coffee and Cocoa trading.

For the past 100 years, we have carefully selected and sourced premium coffee and cocoa beans from the best origins. Year after year and crop after crop, we have built a long-lasting relationship with our stakeholders based on mutual trust, integrity, honesty, and ethical conduct.

As a Swiss-based Company, Walter Matter fully respects the Swiss law that prevails in all domains.

This Code has been established to serve as a guide for all employees working for the Company Walter Matter and beyond if appropriate. Our principles and values are at the heart of our foundations and must live every day through our actions.

We promote relations with business partners that share our values and practices.

ETHICAL BUSINESS

Compliance with laws and regulations

Our practices must comply with all laws applicable to our business in the countries in which we operate. In addition, we support higher ethical standards set up by international organizations although it may go beyond the legal minimum in various countries.

Anti-bribery and anti-corruption

We do not tolerate any form of bribery and corruption in our business through inappropriate pecuniary or other form of benefit.

Bribery is defined as gaining unfair advantage by promising, offering or giving a public official (or other person of relevance) something of value in return for a service, either directly or indirectly through a third party. Such practice is unacceptable, and any suspicion must be disclosed to the Management.

Gifts and entertainments

Over the decades, our reputation has been built based on quality, service, price and suitability, and not for any inappropriate reason. Gifts and entertainments from third parties in connection with our business that do not create a conflict of interest may be allowed but must be of modest value and aligned with local business practice and laws. In case of doubt, the employee should obtain Management's approval.

Fraud against the Company

We have zero tolerance for fraud against our Company. Walter Matter's assets must not be used for unauthorised purposes. This applies to physical assets such as money, machinery, and IT equipment as much as to intangible assets such as ideas, data, and information.

Anti-money laundering

We do not tolerate any form of money-laundering in our business and are committed to taking all appropriate measures to prevent our operations from being used as vehicles for money-laundering or other kind of illegal activities.

Conflict of interests

Employees are asked to avoid situations that may lead to conflicts of interests and must not personally engage into transactions in relation with commodities traded by the Company. Our personal connections must not cloud our judgement when acting on behalf of the business. Consequently, we recommend not to have a personal, social, financial or political activity that may potentially interfere with the Company's activities. In case of doubt, the employee should discuss it with the Manager.



Competition law

We conduct our activities in accordance with all applicable antitrust, competition and trade practice laws. We believe in a fair, competitive and healthy free market system.

Confidentiality

Employees must protect confidential information by using the security systems in place. We do not disclose confidential information, trade secrets and intellectual property that belong to the Company. In the same way, we protect the information received from our business partners.

CORPORATE CITIZENSHIP

We respect the rights of individuals, communities and environment and we aim to have a long term and positive impact in places where we operate our activities.

Human rights, diversity and fair treatment

We provide a working place free from discrimination and harassment where all employees have equal opportunities disregarding from sex, race, origin, religion, age, disability, sexual orientation, citizenship status, or beliefs.

Workplace and employees' conditions

We aim to provide a safe and healthy working environment to our employees built around the culture and values of the Company. We pay fair wages, do not demand excessive working hours and comply with all applicable laws. Employee has the freedom of association and the right of collective bargaining.

Child and forced labour

The Company stands against all forms of child and forced labour in our industry and beyond. We do not tolerate any form of exploitation and do not engage with stakeholders that employ child or forced labour. We are committed to contributing to any action to eliminate abuses in the labour markets of our industry.

Community engagement

We recognize that our activities have an impact on the local communities, and we work to make this impact as positive as possible. We aim to develop a virtuous ecosystem in the regions where we operate considering the local culture and habits.

Environmental protection

As every company, we recognize that we have a role to play to preserve the environment and protect the biodiversity for future generations. We conduct our business in accordance with all applicable laws and regulations and recommend environmental-friendly practices where feasible. Together with our partners, we look for solutions to reduce the negative impacts on the environment.

HOTLINE – REPORTING

At Walter Matter, we can freely discuss and report ethical and legal issues.

A specific email address is available to report any concern over a behaviour that may be unethical or non-compliant with this Code or with the law: ethics@wama.ch