



Dr. Oetker

Responsible Sourcing Policy

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1. INTRODUCTION

1.1 Background

In 2020, the Dr. Oetker adopted the [Dr. Oetker Sustainability Charter](#) and thereby firmly anchored a new roadmap for topics of sustainability. Since that time our Sustainability Charter consists of three dimensions – *Our Food*, *Our World* and *Our Company* – and defines our ambition in form of sustainability targets to positively shaping the social and environmental impacts of our business activities.

To fulfill our company's due diligence in the supply chain, our Supplier Code of Conduct summarizes the general sustainability requirements for our relationship with all suppliers. We source raw materials, packaging materials and traded goods, some of which are associated with high levels of environmental and social risk. For these high-risk materials, we define specific sustainability requirements in line with our Sustainability Charter targets that reflect our ambitions. The document at hand – the Dr. Oetker Responsible Sourcing Policy – summarizes these sustainability requirements.

1.2 Scope

The Dr. Oetker Responsible Sourcing Policy applies for Dr. August Oetker Nahrungsmittel KG and its affiliates worldwide (see attachment 1). The requirements are mandatory for the procurement of raw materials and traded goods. The Policy applies to all existing products and new product developments (local and international).

1.3 Transition Process

For acquired companies there is a transition period of five years, if not stated differently in the chapter of the raw material.

In the case of decisions on new sustainability requirements for materials without a target date, there will be a transition period ending 12 months after this decision, unless otherwise stated in the raw material chapter. If a future target date is set, a material specific roadmap will be created including milestones describing the pathways to achieve the target.

2. PALM OIL



Palm Oil – our ambition

We are committed to source 100% of our palm oil from sustainably managed sources (RSPO certified and at least traceability level “Segregated”).

2.1 Raw palm oil and fat (Materials consisting to 100% of palm raw materials)

The procured palm oil and fat must comply with the RSPO-Supply Chain Certification Standard (SCCS), supply chain model “Segregated”. The supply chain model “Identity Preserved” is permitted, too. The supplier of raw material shall be RSPO SG certified.

2.2 Processed palm oil and fat (Materials consisting to 1% - 99% of palm raw materials)

The procured palm oil and fat, used as ingredient, derivate or fraction in other raw materials (e.g. emulsifiers), must comply with the RSPO-Supply Chain Certification Standard (SCCS), supply chain model “Segregated”. The supply chain model “Identity Preserved” is permitted, too. The supplier of raw material containing palm oil as ingredient, shall be RSPO SG certified.

2.3 Palm oil and fat in traded goods (Materials consisting to 1% - 100% of palm raw materials)

The procured traded goods containing palm oil and fat must comply with the RSPO-Supply Chain Certification Standard (SCCS), supply chain model “Segregated”. The supply chain model “Identity Preserved” is permitted, too. The supplier of traded goods shall be RSPO SG certified.

2.4 Usage of palm oil in recipes

Decisions whether to use palm in recipes are taken within the standard product development / brand process / responsibilities, no separate documentation is needed.

Ingredients (containing palm oil and fat) used as processing aid do not need to be certified.

3. COCOA & CHOCOLATE

Cocoa & Chocolate – our ambition

We are committed to source 100% of our cocoa and chocolate from sustainably managed sources (Rainforest Alliance certified and at least traceability level “Mass Balance”).

3.1 Raw cocoa (Materials consisting to 100% of cocoa)

Procured cocoa as single ingredient (like cocoa mass, nibs, powder) may only contain cocoa from certified sustainable sources, e.g. Rainforest Alliance MB. In general the supplier must be certified. In case of Rainforest Alliance certifications, suppliers must document their deliveries in Rainforest Alliance’s Multitrace system.

3.2 Processed cocoa (Materials consisting to 1% - 99% of cocoa)

Procured cocoa as multi-ingredient (in particular but not limited to chocolate) may only contain cocoa from certified sustainable sources, e.g. Rainforest Alliance MB. In general the supplier must be certified. Suppliers must document their deliveries in Rainforest Alliance’s Multitrace system.

3.3 Cocoa in traded goods (Materials consisting to 1% - 99% of cocoa)

Procured cocoa as part of traded goods (e.g. cakes, finished chocolates, etc.) may only contain cocoa from certified sustainable sources, e.g. Rainforest Alliance MB. In general the supplier must be certified. Suppliers must document their deliveries in the respective certification’s traceability platforms, e.g. Rainforest Alliance’s Multitrace system. If Dr. Oetker only receives the finished, packaged end product, no transaction is required in Multitrace.

4. VANILLA



Vanilla – Our ambition

Dr. Oetker's target is to procure 20% of its natural vanilla used for baking ingredients in line with the Fairtrade standard by end of 2023.*

4.1 Vanilla pods

All vanilla procured through POD must be organic and Fairtrade certified and come from farmers that work under the Vanilla Values initiative and thus profit from the “Dr. Oetker building blocks” established under this initiative and going beyond certifications.

*currently under review



Dr. Oetker

5. HAZELNUTS

Hazelnuts - our ambition

We are committed to source 100% of our hazelnuts from sustainably managed sources by the end of 2025 (Rainforest Alliance certified and at least traceability level “Mass Balance”).

5.1 Raw hazelnuts (Materials consisting to 100% of hazelnuts)

Procured hazelnuts as single ingredient may only contain hazelnuts from certified sustainable sources (e.g. Rainforest Alliance MB). In case of Rainforest Alliance certification, suppliers must document their deliveries in Rainforest Alliance’s Multitrace system.

5.2 Processed hazelnuts (Materials consisting to 1% - 99% of hazelnuts)

Procured hazelnuts as multi-ingredient may only contain hazelnuts from certified sustainable sources (e.g. Rainforest Alliance MB). In case of Rainforest Alliance certification, suppliers must document their deliveries in Rainforest Alliance’s Multitrace system.

5.3 Hazelnuts in traded goods (Materials consisting to 1% - 99% of hazelnuts)

Procured hazelnuts as part of traded goods (e.g. cakes etc.) may only contain hazelnuts from certified sustainable sources (Rainforest Alliance MB). In case of Rainforest Alliance certification, suppliers must document their deliveries in Rainforest Alliance’s Multitrace system. If Dr. Oetker only receives the finished, packaged end product, no transaction is required in Multitrace.

6. CITRIC ACID



6.1 Citric Acid and Citric Acid products (Materials consisting to 100% of citric acid)

Citric acid produced in China may only be sourced from Chinese manufacturers (tier-2) which are certified and/or audited against a social standard (e.g. SA8000, SMETA Audit). In addition, the Chinese manufacturer needs to share a statement of origin specifying the region of origin of the used raw material (e.g. corn, cane sugar beet) to exclude agricultural raw materials from Xinjiang.

7. ANIMAL-BASED MATERIALS



7.1 Broiler

Broiler – Our ambition

We are committed to source 100 % of our chicken meat we use in European markets with higher welfare standards by 2025 (European Chicken Commitment standard).

7.1.1 Usage of chicken as raw material

The use of antibiotics is permitted only to treat animal illnesses. The use of antibiotics as a fattening aid, growth stimulant etc. is forbidden, as well as the usage of any other substance with the same purpose.

Beter Leven standard¹ is authorized to fulfill the ECC criteria for chicken supply.

7.1.2 Usage of chicken in traded goods

The procurement of chicken compliant with the Beter Leven standard is authorized.

¹ In Europe, the *Beter Leven* certification is used which is equivalent to the *ECC (European Chicken Commitment)*.

7.2 Pork

7.2.1 Usage of pork as raw material

The use of antibiotics is permitted only to treat animal illnesses. The use of antibiotics as a fattening aid, growth stimulant etc. is forbidden, as well as the usage of any other substance with the same purpose.

Country specific requirements:

- In **Germany**, the procurement of pork must comply with the QS-certification.
- In **Poland**, the QS standard applies to non-Polish suppliers and the Polish legal minimum standard applies to Polish suppliers.

7.2.2 Usage of pork in traded goods

Country specific requirements:

- In **Germany** and **United Kingdom**, the procurement of pork must comply with the QS-certification. The relevant certificate must be supplied.
- In **Poland**, the QS standard applies to non-Polish suppliers and the Polish legal minimum standard applies to Polish suppliers.

7.3 Eggs

Eggs – Our ambition

We are committed to source 100% cage-free eggs for all our eggs and egg-related products by the end of 2025.

7.3.1 Usage of eggs in raw material

The use of antibiotics is permitted only to treat animal illnesses. The use of antibiotics as a fattening aid, growth stimulant etc. is forbidden, as well as the usage of any other substance with the same purpose.

Eggs and egg-related products (e.g. egg powder) must come from cage-free chickens.

7.3.2 Usage of eggs in traded goods

Eggs and egg-related products (e.g. egg powder) must come from cage-free chickens.

7.4 Tuna

Tuna – Our ambition

We are committed to source 100% of our tuna from sustainably managed sources from 2025 onwards (MSC and “Dolphin-Safe” certified).

7.4.1 Usage of tuna in raw material

Tuna must be skipjack tuna and MSC certified. Suppliers must be “Dolphin-Safe” approved.

8. Annex

8.1 Annex 1: Affiliates of Dr. Oetker

Entity name	Address		ZIP Code	City	Country
Dr. August Oetker Nahrungsmittel KG	Lutterstraße	14	33617	Bielefeld	Germany
Dr. Oetker Tiefkühlprodukte KG Wittlich	Dr.-Oetker-Straße	5	54516	Wittlich	Germany
Dr. Oetker Tiefkühlprodukte Wittenburg KG	Südring	1	19243	Wittenburg	Germany
Dr. Oetker GmbH	Lutterstraße	14	33617	Bielefeld	Germany
Dr. Oetker Brasil Ltda.	Joaquim Lapas Veiga	239	05550-010	Jardim do Lago - SP	Brazil
Dr. Oetker Brasil Ltda.	Rua Eugenio Estoco	131	13255-415	Itatiba	Brazil
Dr. Oetker Canada Ltd.	2229 Drew Road		L5S 1E5	Mississauga, Ontario L5S 1E5	Canada
WDO Brands Industries LLC	Little Falls Drive	251	19808	Wilmington, DE	USA
Dr. Oetker Mexico Holding, S.A. de C.V.	Parque Industrial Bernardo Quintana			zipcode 76246 El Marqués, Queretaro	Mexico
Productos Alimenticios y Dietéticos Relámpago, S.A. de C.V.	Parque Industrial Bernardo Quintana		zipcode 76246,	El Marqués, Querétaro	Mexico
Procesa Alimentos, S.A. de C.V.	Parque Industrial Bernardo Quintana		76246	El Marqués, Querétaro	Mexico
Dr. Oetker USA, LLC	Centerville Road	2711	19808	Wilmington/Delaware	USA
D.O. Productions, LLC	Orange Street	1209	19801	Wilmington / Delaware	USA
Wilton Sub Holdings Inc.	Loockermann St.	9 E	19901	Dover, DE	USA
Wilton Sub Holdings LLC	Loockermann St.	9 E	19901	Dover, DE	USA
Wilton Brands LLC	Suite 311			Dover, DE 19901	USA
Wilton Industries, Inc.	Loockermann St.	9E	19901	Dover, DE	USA
Wilton Brands International LLC	Loockermann St.	9 E	19901	Dover, DE	USA
Wilton Global Sourcing LLC	2nd Street	901 S.	62704	Springfield, IL	USA

Wilton Industries Canada Company	1100 - 1959 Upper Water Street		B3J 2E5	Halifax	Canada
Mavalério USA, Inc.	Hanover Green Drive	7288	23111	Mechanicsville, VA	USA
Wilton Asia Limited	348 KwunTong Road			Kowloon, Hong Kong	Hong Kong
Dr. Oetker Nona Malaysia Sdn. Bhd.	Pusat Bandar Damansara, Damansara Heights		50490	Kuala Lumpur, Wilayah Persekutuan	Malaysia
Dr. Oetker GIAS Export S.A.R.L.	Rue du Lac Toba	1	1053	Tunis	Tunisia
Dr. Oetker Korea Ltd.	Gukhoe-daero	800	7238	Seoul	South Korea
Tag El Melouk for Food Industries LLC	6th October - Giza			Kairo	Egypt
DR OETKER MAROC SARL	Boulevard Al Quods Shore	1100	20270	Casablanca	Morocco
Queen Fine Foods Pty Limited	Wakefield Street	19	4051	Alderley QLD	Australia
QFF Holdings Pty Limited	Wakefield Street	19	4051	Alderley QLD	Australia
Queen New Zealand Pty Limited	Wakefield Street	19	4051	Alderley QLD	Australia
Dr. Oetker Queen Australia Pty Ltd	17 - 19 Wakefield Street		4051	QLD Alderley	Australia
Dr. Oetker Foods Australia No. 2 Pty Ltd	1 Joseph Avenue			Mentone VIC 3194	Australia
Dr. Oetker India Private Limited	Phase-III		110020	New Delhi	India
Dr. Oetker Australia Pty Ltd	1 Joseph Avenue		3194	Mentone	Australia
Dr. Oetker New Zealand Limited	37 Galway Street Takutai Square,			Auckland, 1010,	New Zealand
Dr. Oetker South Africa (Proprietary) Limited	Hans Pirow Street	16	2001	Johannesburg	South Africa
Chateau Gateaux Proprietary Limited	Imvubupark	1	4017	Durban	South Africa
Dr. Oetker Gida Sanayi ve Ticaret Anonim Sirketi	Bekir Saydam Cad.	68	35865	Pancar-Torbali/Izmir	Turkey
Dr. Oetker, d.o.o.	Gmajna	15	1236	Trzin	Slovenia
Dr. Oetker d.o.o.	Josipa Loncara	9 a	10090	Zagreb-Susedgrad	Croatia
Dr. Oetker RO S.R.L.	Str. Albesti Nr.	50	115300	Curtea de Arges	Romania
Dr. Oetker Magyarország Élelmiszer Kft.	Mészáros utca	58/B	1016	Budapest	Hungary
Dr. Oetker Polska Sp. z o.o.	Ul. Admirala Dickmana	14/15	80-339	Gdansk	Poland
Dr. Oetker Bulgaria EOOD	Dragan Tzankov blvd.	59-63	1172	Sofia	Bulgaria
Regal Corp S.R.L.	Str. Alexandru Ioan Cuza nr.	15 - 18	117370	Sat Domnesti, Comuna Domnesti/Judetul Arges	Romania

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UAB Dr. Oetker Lietuva	Kernavés g.	88-139	08216	Vilnius	Lithuania
Dr. Oetker Hellas EPE	Alexandrou Papagou Street	4	14671	Nea Erythrea	Greece
Dr. Oetker Dekor Sp. z o.o.	ul. Ciechomicka	nr 15	09-401	Plock	Poland
RIMCO S.r.l.	Calea Calarasilor	66		Bukarest	Romania
Panovia Prod S.A.	Tineretului str.	2-4		Oltenita	Romania
Dr. Oetker N.V.	De Kleetlaan	7 B bus 1	1831	Diegem	Belgium
La Couronne S.A.S.	ZI Le Chimpy		67130	Schirmeck	France
Dr. Oetker AG	Schachenstraße	25	4653	Obergösgen	Switzerland
Dr. Oetker Nederland B.V.	Netwerklaan	38	3821	AG Amersfoort	Netherlands
Koopmans B.V.	Hardwareweg	8	3821BM	Amersfoort	Netherlands
Cameo S.p.A	Via Ugo La Malfa	60	25015	Desenzano del Garda (Brescia)	Italy
Rebecchi Fratelli Valtrebbia S.p.A	Via Ungaretti	7	29029	Rivergaro	Italy
Dr. Oetker Danmark A/S	Sydvestvej 15,	5 sal	2600	Glostrup	Denmark
Dr. Oetker GmbH	Ringmauergasse	9/1	9500	Villach	Austria
Alsa France S.A.S.	ZI Le Chimpy		67130	Schirmeck	France
Condifa S.A.S.	ZI Le Chimpy		67130	Schirmeck	France
Dr. Oetker France S.A.S.	Rue La Fayette	28 - 30	67023	Strasbourg	France
Anstett S.A.R.L.	ZI Le Chimpy		67130	Schirmeck	France
Dr. Oetker Portugal Lda.	9 C - Torre B - 10. Piso A,		1990-077	Lisboa	Portugal
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Dr. Oetker Suomi Oy	Et. Makasiinikatu	4	00130	Helsinki	Finland
Dr. Oetker (UK) Ltd.	Thorpe Park		LS15 8GB	Leeds	United Kingdom
Dr. Oetker Sverige AB	Avägen	40	SE-412 51	Göteborg	Sweden
Dr. Oetker Norge AS	Rosenholmveien	25	1414	Trollasen	Norway
Dr. Oetker Ireland Limited	Calmount Park, Ballymount		12 PK 27	Dublin	Ireland
Dr. Oetker, spol. s r.o.	L'adová	14	811 05	Bratislava	Slovakia