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CODE OF CONDUCT

POLICY INFORMATION SHEET	
Title	Code of Conduct Policy (the "**Policy**")
Policy Code	EIT Food_POL_01_Code of Conduct
Document Language	English
Responsible Department	Legal Department
Date last update	01 August 2026
Reviewed by	Supervisory Board - Legal Committee Legal Counsel/HR
Scope	All employees, Members of the Management Board and of the Supervisory Board, as well as grant recipients of EIT Food
Applicability	This Policy applies to all activities and operations undertaken by EIT Food
Mandatory Review	01 August 2028

REVISION

The Policy is subject to revision at least once every two (2) years. Such revision is coordinated through and authorised by the Legal Department. Upon sign-off by the HR Department, the revised Policy is forwarded to the Management Board, the Legal Counsel and the Supervisory Board for approval. Publication of the approved Policy is coordinated by the Legal Department.

Users are requested to refer to the latest version of the Policy. The section Revision Highlights below provides an overview of the latest Policy updates.

REVISION HIGHLIGHTS

These highlights provide only an overview of the Policy revisions. The latest version of the Policy should be consulted for changes and/or more detailed information.

Revision and Issue History

Date	Revision	Author	Description
01.07.2022	1.0	HR Department	First version
01.11.2025	1.0	HR Department	Second version
01.08.2026	1.0	Legal	Third version

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1 PURPOSE

The Code of Conduct is intended to lay down EIT Food's expectations and guiding principles for the ethical and lawful conduct of the governing bodies of EIT Food and the individual members of EIT Food Staff.

2 IMPARTIALITY AND INDEPENDENCY

When taking decisions, EIT Food Staff shall ensure that they always act taking into account the scope of their mandate and/or function and in an independent and impartial way and shall refrain from any preferential treatment. In particular, the members of the governing bodies of EIT Food shall perform their duties in conformity with the overall purpose of EIT Food, as laid down in the Statutes and the By-Laws of EIT Food.

They shall refrain from acting solely in the individual interests of individual EIT Food Partners or Group Companies. The conduct of EIT Food Staff shall never be guided by personal interest or political pressure.

The EIT Food Staff must avoid any actions or transactions that may harm the interests of EIT Food. In the event of conflicts of interests, they shall act as stated in the Policy on Conflicts of Interest.

The EIT Food Conflict of Interest Policy defines a conflict of interest as any situation where personal, professional, or business interests could compromise or appear to compromise the impartiality or objectivity of EIT Food staff or Supervisory Board members. The policy provides examples, such as involvement in decisions where there are personal relationships or financial interests at stake. Members of the Supervisory Board must immediately disclose any potential conflict to the Board, withdraw from related discussions and decisions, and have the disclosure recorded in the meeting minutes. Management Board members and staff must declare conflicts to the CEO and refrain from actions related to the conflict, with the CEO (or Supervisory Board, if the CEO is involved) deciding on the appropriate resolution. Failure to comply with the policy may result in administrative measures, and all relevant individuals are required to sign a declaration acknowledging their understanding and commitment to the policy.

In accepting or providing funding, grants, or sponsorship, EIT Food Staff and governing bodies shall ensure that such arrangements do not compromise, or appear to compromise, the impartiality or independence of EIT Food's decision-making. No funding or sponsorship arrangement shall be entered into where it could reasonably be perceived as creating an obligation to favour any particular partner, entity, or interest in the exercise of EIT Food's functions. Where a potential conflict arises between a funding or sponsorship relationship and an individual's duties under this Policy, the provisions of Section 10 (Ethical Funding and Sponsorship) and the Policy on Conflicts of Interest shall apply.

3 OBJECTIVITY

When taking decisions, EIT Food governing bodies and individual members of EIT Food Staff shall take into consideration the factors relevant for the decision at stake and give each of them its proper weight in the decision, whilst excluding any irrelevant element from consideration. In particular, the EIT Food governing bodies and their individual members shall apply this principle when preparing, approving, and executing the Business Plan of EIT Food.

At all times EIT Food governing bodies will respect the non-discrimination clauses as established in the 'Diversity & Inclusion Policy'.

4 INFORMATION

EIT Food Staff shall provide and share, in a timely manner, information with the governing bodies of EIT Food, other members of EIT Food Staff and KIC Partners that is needed for the performance of their duties and tasks (a.o. in the context of the execution of the Business Plan). Such information shall be reasonably accurate and complete. When sharing information, EIT Food Staff shall take into account the confidentiality provisions of the legally binding agreements. When sharing information, EIT Food Staff shall respect the confidentiality of information acquired except when authorized or otherwise legally obligated to disclose. Confidential information acquired in the course of execution of one's duty for EIT Food will not be used for personal advantage. When communicating on a matter on which a competent body of EIT Food has taken a position, the EIT Food Staff shall represent the adopted views of the EIT Food competent body.

5 TRANSPARENCY AND ACCOUNTABILITY

EIT Food governing bodies and individual members of EIT Food Staff must act in a transparent manner and be ready to justify the reasons for particular actions and the context in which they have been taken.

Complaints and information requests must be submitted in writing and are acknowledged within a reasonable time-frame then reviewed impartially with a reasoned written response, ensuring confidentiality and compliance with data protection laws. EIT Food maintains secure registers of all complaints and information requests, accessible only to authorised personnel, and periodically reviews these records to identify trends and ensure accountability. All procedures, deadlines, and data protection measures are published to guarantee transparency for stakeholders.

In relation to funding and sponsorship, EIT Food shall maintain full transparency regarding the sources, terms, and conditions of all funding, grants, and sponsorship arrangements. A register of all funding and sponsorship agreements shall be maintained and shall be accessible to the Supervisory Board and such other persons as the Management Board may determine. EIT Food shall publish, at least annually, a summary of material funding and sponsorship arrangements, subject to any legitimate confidentiality restrictions. Any conditions attached to funding or sponsorship that could influence EIT Food's activities, outputs, or public communications shall be disclosed to the relevant governing body prior to acceptance.

6 LAWFULNESS

EIT Food governing bodies and individual members of EIT Food Staff shall act according to law and apply the rules and procedures laid down in applicable law, rules and regulations.

In particular, they will comply with privacy and information security laws and regulatory requirements such as but not limited to applicable data protection legislation (including the General Data Protection Regulation) when personal information is collected, stored, processed, transmitted, and shared.

7 PRINCIPLE OF NON-DISCRIMINATION

EIT Food governing bodies and individual members of EIT Food Staff shall avoid any unjustified discrimination between individuals, for example based on nationality, sex, racial or ethnic origin,

religion or belief, disability, age, residence or sexual orientation.

In taking decisions, EIT Food governing bodies and individual members of EIT Food Staff shall ensure that the principle of equality of treatment is respected. Anybody who is in the same situation shall be treated in an equal manner.

8 NO IMPROPER ADVANTAGE

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value to or from any third party, including national or European government officials, either directly or indirectly through a third party, in order to obtain or retain certain subsidies, approvals or authorizations, or an exemption from certain legal or contractual obligations. Employees, Supervisory Board members, and representatives must not give or accept gifts, favours, or hospitality that could influence their professional judgment or create a conflict of interest, with only nominal-value items (below 75 EUR) allowed without prior written approval. Any gifts or hospitality above this threshold must be declared and recorded, while cash, cash equivalents, and items from parties involved in procurement or contract negotiations are strictly prohibited. These rules are published internally and included in regular staff ethics and compliance training – please refer to EIT Food Anti-Fraud Policy for further information.

EIT Food Staff shall not commit or participate in any fraudulent acts. EIT Food Staff shall immediately report any fraudulent acts by others concerning EIT Food that come to their knowledge, it being understood that Supervisory Board members shall report such act to the Supervisory Board and all other persons shall report to the CEO.

In the event of alleged fraudulent acts, they shall act as stated in the Whistleblowing Policy. According to EIT Food's Whistleblowing Policy, employees and representatives can report suspected fraud, misconduct, or breaches of policy confidentially to the HR Director or Legal Counsel, either in writing, by phone, or via email, with the option for anonymous reporting. All reports are investigated impartially, outcomes are communicated to the whistleblower, and a summary of whistleblowing activities is reported to the Supervisory Board at least annually, ensuring confidentiality and compliance with data protection laws. In addition to the reporting channels described above, EIT Food maintains an anonymous reporting platform called the Reporting System, accessible at https://eitfood.integrityline.app/. Through the Reporting System, any person may quickly and easily report concerns about actual or suspected misconduct that may affect the company or the well-being of individuals. The Reporting System must not be used to make false accusations against others or to report information that the reporter knows to be untrue. Reporters are encouraged to provide their name when submitting a report; however, whether or not they choose to do so, they are advised to open a secure Inbox within the platform, which facilitates safer and more efficient communication regarding the report. All reports submitted through the Reporting System are treated in strict confidence. An overview of the available external reporting channels is provided on the Reporting System platform.

9 PROFESSIONALISM - FAIRNESS

EIT Food governing bodies and individual members of EIT Food Staff must conduct themselves in such a way as to maintain the integrity of and public confidence in EIT Food. They shall always act in a professional manner, fairly and reasonably and in good faith. They shall maintain skills important and relevant to EIT Food’s needs. Individuals shall be treated with due respect and dignity.

10 ETHICAL FUNDING AND SPONSORSHIP PRINCIPLES

EIT Food is committed to ensuring that all funding, grants, and sponsorship arrangements are entered into and managed ethically, transparently, and in full alignment with EIT Food's mission, values, and public interest obligations. As an organisation supported by public funding and operating in the public interest, EIT Food recognises that the sources and conditions of its funding and sponsorship must not compromise its independence, credibility, or the integrity of its research, innovation, and educational activities. This section sets out the principles governing the acceptance, management, and disclosure of all funding and sponsorship relationships.

EIT Food governing bodies and individual members of EIT Food Staff shall observe the following principles in relation to funding and sponsorship:

(a) Due diligence and source integrity. Prior to entering into any funding or sponsorship arrangement, appropriate due diligence shall be conducted on the prospective funder or sponsor to ensure that:

(i) the source of funds is lawful and does not derive from activities that conflict with EIT Food's mission or values;
(ii) the funder or sponsor does not have a record of serious violations of applicable law, human rights standards, or environmental standards; and
(iii) association with the funder or sponsor would not bring EIT Food into disrepute or undermine public confidence in its activities.

(b) Independence and non-interference. No funding or sponsorship arrangement shall permit a funder or sponsor to:

(i) direct, unduly influence, or veto EIT Food's research agenda, educational content, policy positions, or public communications;
(ii) require the suppression, delay, or alteration of research findings or outputs;
(iii) obtain preferential access to EIT Food's decision-making processes, procurement, or partnership opportunities beyond what is expressly set out in a written agreement approved by the Management Board; or
(iv) require EIT Food to act in a manner inconsistent with this Policy or any other applicable EIT Food policy.

(c) Written agreements. All material funding and sponsorship arrangements shall be documented in a written agreement that clearly sets out:

(i) the purpose and scope of the funding or sponsorship;
(ii) the amount, duration, and payment terms;
(iii) any conditions, restrictions, or obligations attached to the funding or sponsorship;
(iv) intellectual property and publication rights;
(v) provisions for termination and the consequences thereof; and
(vi) disclosure and reporting obligations.

(d) Approval and oversight. All funding and sponsorship arrangements above a threshold to be determined by the Management Board shall require prior written approval from the Management Board or its delegate. The Supervisory Board shall be informed of all material funding and sponsorship agreements on at least an annual basis. The Legal Counsel shall review all proposed arrangements to ensure compliance with this Policy and applicable law.

(e) Ethical exclusions. EIT Food shall not accept funding or sponsorship from any source where:

(i) acceptance would conflict with applicable law, EU regulations, or the conditions of EIT Food's framework partnership agreement with the European Institute of Innovation and Technology;

(ii) the funder or sponsor is subject to sanctions or is on any applicable restricted party list;
(iii) the funder's or sponsor's core activities are fundamentally incompatible with EIT Food's mission to make the food system more sustainable, healthy, and trusted; or
(iv) acceptance would give rise to a material conflict of interest that cannot be adequately managed.

(f) Branding, acknowledgement, and endorsement. Any public acknowledgement of funding or sponsorship shall be factual and shall not imply that EIT Food endorses the funder's or sponsor's products, services, or commercial activities. EIT Food's name, logo, and reputation shall not be used by any funder or sponsor in a manner that suggests endorsement or partnership beyond the scope of the written agreement. All branding and acknowledgement provisions shall be set out in the written agreement.

(g) Reporting of concerns. Any EIT Food Staff member or member of a governing body who becomes aware of a funding or sponsorship arrangement that may not comply with this Policy, or who is subject to pressure from a funder or sponsor to act in a manner inconsistent with EIT Food's interests, shall report the matter promptly to the CEO or the Legal Counsel. Reports may also be made in accordance with EIT Food's Whistleblowing Policy. No individual shall suffer any detriment for making a report in good faith under this section.

11 CONSEQUENCES OF NON-COMPLIANCE

Any failure to comply with this Policy, applicable laws, rules or regulations, or any other EIT Food policy shall be treated on a case-by-case basis, having regard to the nature, severity and circumstances of the non-compliance. Consequences may include, but are not limited to, a formal warning, mandatory training, suspension of duties, termination of employment or engagement, or legal proceedings, as appropriate. Where applicable, consequences shall also be determined in accordance with the requirements of local legislation in the jurisdiction in which the individual concerned is based or in which the non-compliance occurred.

All members of the Supervisory Board and the members of the Management Board and other EIT Food Staff shall be required to sign the following declaration:

I have received a copy of the current Code of Conduct Policy of EIT Food. I have read, understand and agree with it and I will abide by it.

Name:

Signature:

Date: