

AAK Code of Conduct for Agents and Distributors

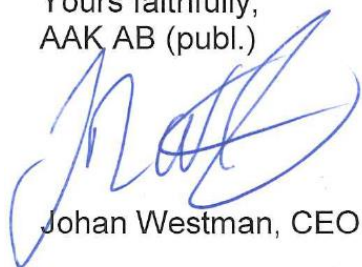
INTRODUCTION

AAK's vision is to be the first choice for value-adding vegetable oil solutions. In order to obtain our vision it is of vital importance to AAK that each individual AAK representative is financially, socially and ethically conscious and responsible.

Within the AAK Group we have a common set of values. It means that we share the same company culture wherever we work in the AAK Group. These values combined with this AAK Representative Code of Conduct (the Code), our policies and our rules for corporate governance provides a strong framework for our operations. In that way we can maintain the trust of our stakeholders, which is essential for the success of our business.

The Code is applicable to all AAK representatives in all business areas in all markets at all times. It is the responsibility of each AAK representative to do the "right" thing. That responsibility cannot be delegated.

Yours faithfully,
AAK AB (publ.)



Johan Westman, CEO and President

DEPLOYMENT

Implementation

AAK representatives have a personal responsibility for ensuring that their activities comply with the Code. Should a situation occur where no specific guidelines exist, their conduct should be compliant with the spirit of the Code.

AAK representatives are expected to ensure that their business complies with the Code and to make sure that relevant business partners are duly informed of its content.

AAK representatives have a responsibility to ensure that the Code is implemented in their area of responsibility. Further, they shall create an environment that encourages their employees to act in compliance with the Code and shall act in a way that exemplifies how the Code is applied in practice. Information and training sessions should be held as needed.

Compliance

Failure to comply with the Code may result in disciplinary actions, including terminating cooperation with AAK.

AAK representatives must inform their AAK contact if they have reason to suspect that laws, legal requirements or the Code are being materially violated. They can do so without fear of reprisal from anyone, and the necessary confidentiality and anonymity will be respected.

Anyone who finds it difficult to bring up an issue with their AAK contact should contact AAK's Code of Conduct Function via code@aak.com. (For details on the Code of Conduct Function, please refer to the note at the end of this document).

INFORMATION & COMMUNICATION

Confidential information

Any information that is not public property or public knowledge should be considered confidential information. Examples are trade and business secrets and personnel information.

Confidential information is protected and is not disclosed unless required by law or authorized by management. Necessary steps to avoid unintentional disclosure of confidential information are taken, which include storing and transmission of such information in a safe manner.

Confidential information received from third parties is handled with similar respect.

Records

The integrity of AAK's record keeping and reporting systems is of outmost importance. AAK representatives shall ensure that records are accurate, complete and reviewed, whether they are for internal or external use.

AAK representatives must apply accounting rules and controls, and follow company procedures for retaining and disposing of records.

Government investigations

AAK representatives cooperate with any appropriate government investigation. If a governmental demand in this respect is put forward, whoever receives this demand must inform their AAK contact before any action is taken or commitment is made.

AAK representative privacy

AAK representative's records are not released to any person unless required by law or with the written consent of the representative concerned.

BUSINESS ETHICS

Laws and regulations

AAK representatives respect the laws and regulations in the countries in which they operate and require that their partners do the same.

Should any requirement in the Code violate applicable law, the law takes precedence.

Fair business dealing

AAK representatives behave in accordance with high business ethics and act compliant with antitrust, competition and fair dealing laws.

Bribery, gifts and favours

AAK representatives will not accept or offer any form of bribes, whatever the form, method or purpose.

Gifts, entertainment or personal favours may be offered and accepted only if they do not have any influence on business transactions and are of reasonable value and consistent with applicable laws and customary business practice.

All kinds of compensation to suppliers and partners are based on verifiable supply of products and/or services only.

AAK representatives strive to avoid and minimize facilitation payments.

Charitable contributions or sponsorships are not used as a subterfuge for bribery.

Political contributions and lobbying

AAK representatives do not pay political contributions to obtain business advantages.

Conflict of interests

AAK representatives avoid private activities, financial interests or relations that might lead to a conflict of interests with the interests of AAK. If a conflict occurs or can be foreseen, the AAK representative is required to discuss and solve the matter with his/her AAK contact.

Examples of conflicts of interests could be:

- Personal engagement in activities in competition with AAK business
- Personal financial interests in conflict with AAK interests
- Employment of, buying from or selling to closely related persons

HUMAN & LABOUR RIGHTS

Social responsibility

AAK supports the ten principles of United Nations Global Compact in the areas of human and labour rights, environment and anti-corruption, and perceives the principles as a powerful platform for our activities.

Specifically, AAK and AAK representatives in their actions adhere to “AAK Group Policy: Corporate Social Responsibility”.

Working hours and compensation

AAK representatives comply with local laws and regulations regarding workers' contracts, working hours, including overtime and overtime compensation.

Salaries are paid on time and comply with the applicable local legislation and the local market situation. Employees are entitled to a minimum of one day off in seven and to take time off for established national and local holidays.

Employees are granted the stipulated annual leave, sick leave and maternity/paternity leave without any negative repercussions.

Recruitment and development

Recruitment and promotion of employees is based on a match between assessed job requirements and applicants' qualifications and experience.

AAK representatives provide a working environment where everybody is treated with respect and dignity and is given fair and equal opportunities for personal development regardless of gender, age, race, religion, sexual orientation or national origin. No form of discrimination or harassment in the workplace is tolerated.

HEALTH, SAFETY & ENVIRONMENT

Workplace

AAK representatives provide a safe working environment and are committed to continuously reduce risks that may cause accidents or have a negative impact on the health of its employees.

Environment

AAK representatives continuously seek to optimize the use of resources, reduce the amount of waste, prevent pollution and in general minimize the environmental impact of their activities.

AAK's Code of Conduct Function has been established to handle reports from employees and AAK representatives about material violations of laws, legal requirements and/or the AAK Code. The Code of Conduct Function can be contacted by email to code@aak.com. Emails sent to



this address are read only by Anne Mette Olesen, CMO and head of CSR, and Mads Feer, Global CSR Manager, and are treated confidentially, keeping the sender anonymous.

AAK Code of Conduct for Agents and Distributors

Agent's or Distributor's acknowledgement

We hereby confirm that we have received and taken due note of the contents of the AAK Code of Conduct for Agents and Distributors – version November 2013.

By signing this document we confirm that we have read, understood and will respect and comply with the Code:

Date and place: _____

Signature: _____

Name and title: _____

Company name: _____

Please return the signed document to AAK