



Strauss's CODE OF ETHICS

From Values To Actions



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OUR FROM VALUES TO ACTIONS

This Code defines the principles for ethical conduct to which we are committed, and which we view as essential to our ability to survive as an organization in the business world. Our ethics are based on who we are and reflect how we conduct ourselves. The ethical principles that guide us are derived from our heritage, goals and values.

WAY

"Following the Strauss way" means, first and foremost, transforming our heritage, goals and values into an integral part of our ongoing conduct. The principles described in this Code are designed to help each one of us at Strauss to translate all of our guiding principles into deeds, decisions and actions, in a way that ensures that we build trust with our different stakeholders and act to make a positive impact on their lives.

Our goal of "**improving people's lives**" expresses the essence of everything we do: our beliefs and commitments, our heritage, and our aspirations as individuals and as an organization. We act according to this goal, implementing our values, which form the company's genetic code:



Daring
& Caring

Passion &
Responsibility

The Team





Daring & Caring

At Strauss we combine **daring and caring**. We dare to act with determination, undertake challenges, and continuously explore the quality of our actions and initiate innovations. Driven by our openness to adopting innovation in all our endeavors, we encourage our personnel to promote innovation. We succeed in doing all this while remaining considerate of others, caring about people, and heeding the needs of all our stakeholders, including our customers and consumers, our employees, suppliers, shareholders, business partners, the community, and the environment in which we operate: everywhere. As part of our approach to act with daring, and promote innovation, we build on collaborations with outside entrepreneurs, with whom we maintain relationships based on mutual learning and assistance, respect, and business ethics.

Passion & Responsibility

We act **responsibly** and with devotion even as we **passionately** pursue our activities. Passion is the source of our strength and energy. Passion drives us to improve and expand our horizons, while setting ambitious goals and taking full responsibility for the consequences of our actions.

As a leading company, we are responsible to all our stakeholders for ensuring professional conduct with a commitment to staying up-to-date, learning, and constantly improving our activities.

We are responsible for generating and promoting activities that contribute to strengthening all our stakeholders' social and economic interests. We also have the responsibilities of developing and manufacturing high quality, varied and safe foods, engaging in fair and diverse employment practices, and advancing positive value for all our partners.

We are committed to promoting quality, health, and transparency, to supporting the people we work and act with, and to protecting the environment. We are committed to decency and fairness and to fulfilling our obligations. We take full **responsibility** for every one of our actions.

The Team

We believe that the best way to effectively initiate improvement processes, guarantee professionalism, and increase the value we create for all our stakeholders is through **teamwork** and cooperation. We encourage all our employees to work collaboratively, and see ourselves as part of a company that supports development based on the principles of mutual respect, achievement through integrity, mutual enrichment and cultivation, and a spirit of sharing varied abilities in an atmosphere of openness.



Diversity & Inclusion

We are committed to an approach that promotes a culture of diversity and inclusion empower our employees and the communities in which we work, cultivate innovativeness, and build trusting relationships throughout our value chain. Promoting a culture of diversity also enhances our ability to address the needs of our customers and consumers, and allows us to attain better and more ethical long-term results. For us, diversity and inclusion are both a business necessity and a basic belief. They represent fundamental values and a code of conduct deeply embedded in our daily interactions and decisions.

For Strauss Diversity and Inclusion Policy [click here](#)

Our commitment to the principles of diversity and inclusion reflects our care and respect towards people, including our concern for the lives of the thousands of people in our employ, our relationships with suppliers, and the millions of people we reach every day through our products and activities. Translating our goals and values into everyday actions is the challenge addressed by our Code of Ethics. The Code of Ethics is intended to serve as a guide, instructing us on how to act and cope with the challenges and moral dilemmas we encounter. It charts the general direction to be taken at every juncture, ensuring that all of us can follow the Strauss ethical path.

The principles described here are intended to be used by all of us, all over the world, in every field in which we operate. We will use the guidelines described in this Code to define our conduct in relations with all our stakeholders: our shareholders, employees, consumers, customers, suppliers and business partners, competitors, the community, the environment, and the government authorities in all the countries where we operate.

At the same time, we will encourage those with whom we come into contact to adopt the principles of our Code. This will contribute to the improvement of the business environment everywhere we operate.

Each one of us, as a part of and partner to one international company accepts the responsibility of becoming familiar with the Code of Ethics, understanding its contents, taking the path it prescribes, and serving as an example to others.

We conduct our business with a commitment to maintaining the highest standards of management with integrity, credibility and reliability, professionalism and fairness. We aspire to be leaders and to serve as a role model for others in all aspects relating to the quality of our management.

Compliance with the law is an essential and minimum condition for ethical conduct. We consider ourselves committed to meeting standards that surpass those prescribed by the laws and regulations that apply to our business in every country where we operate.

For all of Strauss Policies [click here](#)



STRAUSS

EMPLOYEES

We at Strauss are committed to being a company that respects its employees. A company in which the spirit and culture unite with the passion to grow and the daring to change. We are a company that empowers individuals and teams, and encourages them to initiate and innovate. A company whose employees are treated with trust, respect and fairness. A company that is committed to providing its employees with a healthy, pleasant and safe work environment that inspires challenge and encourages cooperation and teamwork.

We compensate our employees fairly for their work and provide them with good working conditions.

We protect the rights of all our employees, as set forth in the law and in agreements, and compensate them fairly, according to their skills and performance, and taking local market conditions into consideration.

We are committed to providing our employees with a healthy and safe work environment, and with all the equipment and knowledge necessary to accomplish this end.

We oppose all discrimination on the basis of race, skin color, religion, physical disability, ethnicity, age, sexuality, gender, gender identity and gender expression, marital status, civil status or any other type of difference.

We are committed to providing our employees with a work environment that is free of threats, violence and harassment. We will not tolerate any form of aggression, whether physical, verbal, sexual, or psychological, for any reason, or any form of harassment, including sexual harassment, or any behavior that makes other people feel unsafe.

For Strauss Occupational Health and Safety Policy [click here](#)



We grant equal opportunity to all & encourage occupational diversity and personal development.

We believe that our strength arises from the differences between us, and that the different backgrounds and cultures we come from enrich the work environment. We are therefore committed to hiring, employing, promoting and compensating employees on the basis of their skills and their ability to do their jobs in the best manner possible, with no discrimination of any kind. Moreover, we will act with the goal of enriching the variety and human diversity that exist at Strauss.

We are committed to encouraging the personal and professional development of our employees. We invest resources in enriching their skills and competencies.

Our work environment is constantly changing, as is our business environment. We bear the responsibility of adapting to the changes and transformations occurring around us, while responding to the expectations of the employees in the field. Therefore, we maintain a reward policy and appreciation systems for outstanding employees, who, in addition to performing their meaningful work, serve as examples and role models for advancing our organization's values.

Maintaining our employees' privacy and dignity is one of our core values. As part of our efforts in the field of protection of privacy, we make sure to protect the information we collect and process from our employees, ensuring it remains private and confidential. We use this information solely for the purposes for which it was collected and in careful compliance with all the provisions of protection of privacy and use of information laws. We act with full transparency with our employees in all matters related to their personal information.

We encourage the company's managers to create a work environment that allows employees to maintain a balance between their work and family life, out of an understanding that this balance increases their satisfaction and quality of life.

We are ethical regarding Inter-personnel relation.

At Strauss, we encourage our employees to work in cooperation with each other. We maintain our obligation to report about inter-personnel relationships in cases where one of the parties is in a position of authority. In such cases, we act to change one of the party's position or to remove the authority.

We refrain from conflicts of Interest and from exploiting business opportunities for personal needs.

In our jobs, we act exclusively for the benefit of the company, and do not permit our judgment to be swayed by outside considerations, actually or seemingly.

We refrain from exploiting possibilities and business opportunities offered to us as a result of our job and position in the company. We use these opportunities and possibilities exclusively to accomplish Strauss's objectives.

We conduct ourselves with personal responsibility and know that we are expected to acknowledge ethical difficulties we've encountered, even if doing so contravenes the instructions received from our superiors.

We will refrain from abusing our power against our employees and managers or any other stakeholder, and will act with fairness and respect towards any person.

Accountability

Our employees are responsible for being knowledgeable, professional, and informed about all issues under their responsibility, and they must aspire to perform their tasks to the best of their abilities, to actively learn and stay up to date in their fields of endeavor, and to constantly improve their performance.



We give and receive gifts and hospitality only in appropriate circumstances.

At Strauss we give and receive gifts, and extend and accept hospitality and other benefits which are reasonable and proper according to the circumstances and company policies and procedures, and which are not designed to influence decision making or create a commitment on the part of the recipient or the giver, in actuality or in appearance. Our employees must make sure to act according to the provisions of Strauss's gifts and hospitality procedure, including obtaining all required approvals for giving or receiving gifts or hospitality.

We do not exploit inside information and refrain from disseminating privileged Information.

We do not use inside information for personal gain or for the benefit of any other party. We do not disseminate privileged information about Strauss, its activities and plans.

We make fitting use of the company's assets.

We use the company's resources and assets responsibly and exclusively for the benefit of the company.

We protect the rights of employees employed through subcontractors on our behalf.

We are aware of our responsibility to people working in the company who are employed through subcontractors. We are committed to taking action to ensure that their employment conditions are suitable and that their rights set forth in the law are protected by their direct employers.

We conduct ourselves appropriately in social networks.

Social networks present many challenges and require appropriate risk management, along with the management of opportunities to create relationships and promote transparency towards our stakeholders.

We manage the risks of these digital channels through a clear policy that applies to all our employees. This policy demands taking responsibility regarding transparency, ensuring the implementation of protection of privacy laws, and avoiding risking disclosure of any sensitive information.

For Strauss Human Rights Policy [click here](#)



STRAUSS

CONSUMERS

Our consumers expect us to provide them with nutritious and enjoyable food and beverage, protect their health, and supply them with high quality, safe, and healthy products in a manner that creates a positive experience. We do this in full acknowledgment of our responsibility to justify the trust they place in us.

We act to advance these expectations, and to create regular and ongoing reports concerning our progress, in order to advance our goal of improving people's lives.

Our integrity is also expressed through our insistence on the fair pricing of our products and services, as well as the development of products that meet unique nutritional needs arising from reasons of health or faith.



We deliver safe, quality products.

We consider consumer safety a supreme value. We are committed to adopting every measure to supply safe products.

We are committed to complying with the highest standards of product quality and to investing efforts in order to achieve continuous improvements in quality.

For Strauss Product Safety Policy [click here](#)

We mark and describe products in a manner that is reliable and clear, and that is not misleading.

We are committed to complying with strict requirements in terms of product marking everywhere we operate. We make sure that all our products are marked in a manner that conforms to their contents and describes them accurately and reliably. We make every effort to ensure that the description of the products we

supply meets the needs of the consumer public and does not mislead them.

We promote expanding the information presented on our product packages beyond that which is required by law.

Responsible Marketing and Advertising

We at Strauss respect all persons and are cautious in the wording and presentation of our advertisements and communication with the public, in order to refrain from offending sensitivities or making false promises, and in accordance with a clear policy dedicated to responsible and transparent communication concerning our products.

Maintaining the privacy of our consumers is very important to us. As part of our efforts in the field of protection of privacy as described above, we make sure to protect and secure the information we collect and process from our customers, keeping it private and confidential. We use this information while diligently following the provisions of the laws of protection of privacy and use of information, and solely for the purposes for which this information was collected.

For Strauss Responsible Marketing Policy [click here](#)

We conduct ongoing dialogues with our consumers.

Our relationship with consumers is important to us. We are committed to handling every incoming complaint, need or request from our consumers efficiently, quickly, courteously and responsibly.

We are committed to being attentive to our consumers and to making use of their information and feedback in our organizational processes.

We view our relationship with our consumers as central to our activities, and act according to our commitment to provide accessible, available, convenient, and professional services, with respect, fairness and transparency, and while providing our customers with the full information relevant to them.

We believe that creating a reliable and meaningful relationship contributes to a long-term ongoing relationship of trust with our customers.

For Strauss Human Rights Policy [click here](#)



SUPPLIERS & CUSTOMERS

We act with passion and determination every day to meet the business targets of growth and profitability that we have set for ourselves, while maintaining long-term stability. In addition, we make sure to act with responsibility and care towards our suppliers and customers, who are an important part of our ability to constantly grow and develop. We believe in the importance of true partnerships as a foundation of our ability to create value and to attain the company's goals.

We are committed to selecting and conducting business with our partners and suppliers with fairness, integrity, and without bias, and to ensuring that these parties are also promoting the values and principles of ethical behavior. We are committed to guaranteeing that our collaborative activities will respect local laws and regulations, local cultures, ethical guidelines, and will prohibit bribery and corruption, as we have undertaken.

We are committed to conducting our negotiations and our ongoing activities with fairness, to complying with the agreements to which we are a party, and to refraining from any abuse of our power.

We consider our work as an opportunity for enrichment and openness by engaging with diverse groups among our suppliers. We are acting to promote inclusive and enriching collaborative multicultural and multi-ethnic work, while encouraging the selection of diverse suppliers.

For Strauss Human Rights Policy [click here](#)

For Strauss Responsible Sourcing Policy [click here](#)



OUR COMPETITIVE ETHIC

We constantly strive to be leaders in every field in which we are active and to rise to the challenges we set for ourselves. We do this while acknowledging the responsibility we bear to maintain our integrity and the rules of fair competition.

We respect competition and competitors.

We are committed to adhering to fair and fitting rules of competition in our relations with our competitors. We will not slander them, their actions, or their products.

We protect the proprietary rights of others.

We are careful not to abuse the proprietary rights of others and ours.

GOVERNMENT AUTHORITIES

We respect all regulatory entities operating in our fields of business, and diligently comply with the provisions of all laws and regulations as a basis for all our activities.

We do our utmost to avoid any involvement with lobbying activity. In rare cases where lobbying is needed, we engage in it in accordance with the law, work regulations, and only through authorized channels.

We avoid any involvement in politics.

We avoid participating in any political events, contributions and contribution collections for any party or politicians, or promotion of any political party or political candidate's views as part of our work, or while using our facilities or products.

SHAREHOLDERS & BONDHOLDERS

We are committed to making our best effort to create long-term positive economic value for Strauss's investors and all our stakeholders. In order to promote trust and transparency in our relationship with our investors, we report our business and financial state regularly and in accordance with the law. We also report all social and environmental aspects of our activities.

We are committed to diligent compliance with the law, as well as to ethical conduct, always exercising integrity and engaging in transparency with regard to our shareholders and bondholders.



THE ENVIRONMENT

As manufacturers we are aware of the impact of our actions on the quality of the environment and accept full responsibility for our actions.

We are aware that adopting an attitude of environmental responsibility is likely to contribute to a sustainable environment for the generations to come. We therefore consider it an objective and a challenge to reduce the impact of our actions on the environment and to increase awareness of environmental protection among our employees, suppliers and consumers.

We are committed to taking action in order to improve our environmental performance everywhere we operate.

We will act out of environmental awareness and incorporate environmental considerations in our various decision-making processes.

We will aspire to excellence in protecting the environment and promoting sustainable solutions throughout our products' life cycles and our chain of value in planning, development, manufacture, and regular service for all our products and services.

We will act to raise awareness of the importance of protecting the quality of the environment among our employees, customers, partners, suppliers, and consumers.

For Strauss Environmental Sustainability Policy [click here](#)



THE COMMUNITY IN WHICH WE OPERATE

We credit our constant growth to the trust placed in us by the members of the communities in which we operate. We therefore feel deeply committed to displaying social responsibility to the community everywhere we operate.

We strive to support communities in promoting social goals for the development of economic resilience.

We are attentive and caring to the communities in our areas of activity

We are committed to conducting an open, ongoing dialogue with the members of the communities in which we operate, to respecting their needs, preferences and wishes, and to taking them into consideration in our decision-making processes.

COMMUNITY

We support the well-being of the communities in which we operate.

We take action to empower the communities in which we conduct our business, and encourage our employees to be personally involved in social activities we initiate.

For Strauss Human Rights Policy [click here](#)

For Strauss Community Investment Policy [click here](#)



PREVENTION OF BRIBERY & CORRUPTION

We believe in fairness, transparency, and openness in working with all our stakeholders. We have formulated a policy, procedures and systems for the prevention of bribery and corruption, as well as systems for preventing conflicts of interest.

Our Anti-bribery and Corruption Charter serves as a guideline for our general and basic principles about this issue. It reflects our approach, according to which Strauss is not interested in obtaining any business or business advantages through bribery of any kind, whether in money or in kind, directly or indirectly.

In addition, we implement concrete procedures and processes for the prevention of bribery and corruption through third parties, hospitality, gifts and donations.

We expect all our employees and suppliers to act according to these principles and regulations.

For Strauss Anti Bribery and Corruption Policy [click here](#)

RECORDS & REPORTING

As a public company, we ascribe paramount importance to applying the strictest standards when reporting and maintaining records of our activities and in the various reports we provide to our stakeholder public.

We scrupulously maintain the company's documents.

We record our ongoing business activities while maintaining the strictest standards and in a manner that represents all our activities and reflects them accurately and reliably. This is designed to ensure that the information we use for our internal needs and for the purpose of external reporting will faithfully serve the company, its employees, creditors, investors and other stakeholders in making high quality, objective decisions to the benefit of all stakeholders.

We report to the public and communicate with It reliably.

We are committed to providing to our stakeholders, to the public in general, and to the various authorities in particular, reports that are accurate, complete, reliable, and in compliance with all relevant laws and regulations, while reflecting the proper level of openness and transparency.

PROTECTION OF PRIVACY

At Strauss, we believe that personal information is a private asset which must be preserved and respected. As an organization that collects and processes information about a large number of subjects around the world, we put great effort into protecting and securing the information in our possession, and its management and use, according to all relevant laws, and in accordance with our internal guidelines, which include our Data and Privacy Protection Charter, and clear processes and controls.

Our Data and Privacy Protection Charter includes basic principles reflecting our approach to the issue, and dictates our basic principles and expectations from every employee concerning the protection of information and privacy, and in compliance with the provisions of the law.

For Strauss Data and Privacy Protection Policy [click here](#)



IMPLEMENTING THE CODE OF IN STRAUSS

ETHICS

The Code serves us as a compass. Its principles, along with our goals and values, are designed to enable us to choose the right way when we reach a crossroad. In many cases, this will not be an easy task. The challenges life places in our path will frequently require us to use our judgment, taking the different options into account, and choosing the one that best reflects who we are and who we want to be. At the same time, the Code cannot - and nor is it meant to - provide answers to every question and dilemma that may arise.

We undertake a commitment to make every effort to facilitate the task of navigation. We will make the Code accessible and clear, we will explain the logic behind each of its principles, and provide examples of how they should be properly applied.

This will be accomplished in training sessions for both veteran and new employees, and through the ongoing supply of information.

Additionally, we are committed to constantly reviewing our policy, our strategy and the objectives we define for ourselves, in order to ensure that they reflect the principles contained in the Code of Ethics.

Each and every one of us is responsible for asking for help and guidance when encountering an ethical dilemma with which he or she does not know how to deal.



Whistleblower protection policy and Hotline

Should you encounter a violation of the principles of the Code of Ethics, you must provide notice of such violation. You can report such violations through various channels: speaking with your direct superior; contacting the company's ethics supervisor; contacting the company's internal auditor or the compliance officer.

In addition, according to the instructions of Strauss's whistleblower protection policy, which also applies to violations of the Code of Ethics as well as to other violations, you can submit an anonymous complaint through our hotline, which is maintained by an objective external body, assisting us with investigating and handling complaints individually and diligently, without exposing the relevant whistle-blowers' involvement. You can contact the hotline through the report submission in this address: <https://report.whistleb.com/en/strauss>.

The service is offered in a variety of languages. In accordance with the Russian privacy laws, here is the link for Russian language inquiries or complaints: <https://report.whistleb.com/he-IL/strauss-ru>

We undertake to protect whoever has realized this commitment and given warning of the violation of the Code of Ethics. All complaints submitted will be addressed with all due seriousness.

Any violation of the Code's principles will be treated with gravity and disciplinary action taken if necessary.

We have defined a set of indicators and goals to promote the effective implementation of the Code of Ethics, which are reviewed annually. In addition, we have defined a supportive organizational structure, as well as management, follow-up, and control processes for implementation with our employees, suppliers, and partners.

We invite all stakeholders to a shared dialogue and constructive criticism about our Code of Ethics and our actions for its implementation, through all our communication channels. In addition, from time to time, we conduct surveys examining the views and expectations of different groups of stakeholders concerning the ethical issues presented in Strauss's Code of Ethics.

We believe that with the help of the Code of Ethics and the ethics mechanisms in place in the company, we will succeed in navigating our way in a responsible manner, while fully realizing & implementing the principles of the Code, the values of the company and its goals.

For all of Strauss Policies [click here](#)

Note: in the "Suppliers and Customers" chapter, the "customers" are retail customers of the Strauss Group and are not customers of Strauss Water Company.

In the "Strauss Consumers" chapter - Strauss Water Company refers to the company's customers.

