



# Our Code of Conduct



# A leader in circularity

Darling Ingredients transforms materials from the animal agriculture and food industries into valuable ingredients — ingredients that nourish people, feed animals and crops and fuel the world with renewable energy.

## Our global family of brands

Our brands span more than 260 facilities across the world, transforming more than 16 million metric tons of raw material into over 350 sustainable ingredients every year.



**DAR PRO**  
SOLUTIONS

**Rousselot**

**GELnEX**

**Rendac**

**hepac**

**Bakery Feeds**

**ENVIROFLIGHT**

**NS Nature Safe**  
FERTILIZERS

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**sonac**

**GLOBAL**  
CERAMIC MATERIALS LIMITED

**FASA**

**ecoson**



**MIROPASZ**

# A message from our CEO



Since the Company's start as a small Chicago rendering business more than 140 years ago, Darling Ingredients has become the number one publicly traded company of our kind by repurposing and recycling materials from the animal agriculture and food industries. Since I came onboard in 2003, Darling Ingredients is one of the world leaders in circularity, transforming materials that would otherwise be wasted into feed, food and fuel for the world.

Our mission is important, as is how we achieve it. We follow Darling Ingredients' core values of integrity, transparency and entrepreneurship. Working together we can achieve a lot, and individually we each have a responsibility to always act ethically and maintain the Company's strong reputation.

Our Code of Conduct provides the values and principles that we should use to guide us in conducting business responsibly and making ethical everyday decisions. I encourage you to read our Code and be prepared to meet the expectations laid out in our Code. It is important for all of us to speak up – ask questions and report concerns. Our Code cannot possibly cover every situation we might encounter, but we can and should always seek help when we need it.

I thank each and every employee for your ongoing dedication and commitment to Darling Ingredients. Together, we will continue our ongoing success and building a better world.

Randall C. Stuewe,  
Chief Executive Officer

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# Introduction

Our values

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As a world leader in circularity, Darling Ingredients Inc. (“Darling Ingredients” or “Company”) takes materials that would otherwise be wasted and transforms them into hundreds of valuable ingredients that the world depends on daily – food for livestock, pets and people; gelatin and collagen for human health and well-being; low-emission fuel for cars, trucks, trains and planes; and renewable energy to power homes and businesses.



With population growth and wealth creation, there are two things the world will need more of: food and energy. Darling Ingredients helps provide both.

## Our values

It is vital that our business practices and individual conduct be open and honest, qualities that are reflected in Darling Ingredients' three core values: integrity, transparency and entrepreneurship.

These values are the foundation of everything Darling Ingredients stands for, and they form the basis of our Code of Conduct ("our Code"). We are to reflect these values so Darling Ingredients' customers, investors, shareholders and suppliers can feel safe placing their trust in the Company's products and services.



### INTEGRITY

We are honest, accountable and reliable, and we treat others with respect. Acting with integrity contributes to a more enjoyable work environment and helps ensure we maintain the Company's high standards and ethics.



### TRANSPARENCY

Transparency and integrity go hand in hand. What we say is supported by what we do, and the Company records support our words and actions. Our openness allows us to build a foundation of trust – in the workplace and in all Company interactions – that furthers our success.



### ENTREPRENEURSHIP

We are a rich blend of people with a broad range of knowledge and experiences. We look for innovative ways to shape our company's future and continually seek to share ideas to improve the Company's supply chain, products and operations. Darling Ingredients wants everyone to be a part of and take ownership of our success so that we can create value for the Company and stakeholders.



## Our Code applies to all of us

Our Code is designed to provide practical guidance and direct us to resources to answer our questions. Our Code is translated to our standard operating languages.

### Our Code applies to the following people (collectively, “we”):

- All Darling Ingredients employees, contractors, joint ventures and subsidiaries
- All members of the Darling Ingredients Board of Directors when acting in their capacity as Company Directors
- Intermediaries, representatives, independent contractors and consultants, where applicable, when conducting business with or on behalf of Darling Ingredients

## Manager responsibilities

While all employees are expected to work with integrity and treat others with respect, managers play an important role in the Company, and they help set expectations when it comes to upholding Darling Ingredients’ values and ethical decisions by:

- Setting the culture and tone of their teams, upholding Darling Ingredients values and always making ethical decisions
- Leading by example by showing their team the value of ethical decision-making, being familiar with our Code and Company policies, taking necessary training and speaking up with questions and concerns
- Keeping an open door, seeking help when needed and escalating issues that are brought to their attention



## Compliance with our Code, Company policies and the law

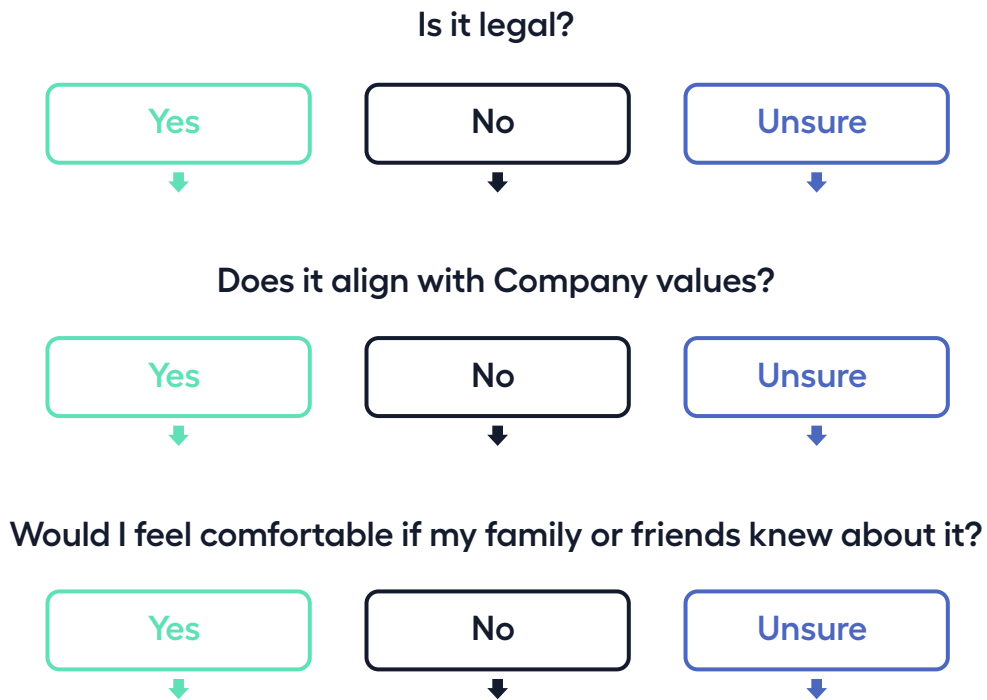
We act ethically and follow our Code, Company policies and all applicable laws, rules and regulations of the countries in which we operate and do business. If we violate any of the above while conducting business, the Company may take appropriate disciplinary action, up to and including termination of employment, as allowed by local law.

## Waivers

Only the Darling Ingredients Board of Directors may approve any waiver of our Code of Conduct with respect to any executive officer or director, and any waiver will be publicly disclosed, when required by law.

## Good decisions through discussion

Our Code cannot cover every risk, and it is never a substitute for common sense and good judgment. If you ever encounter a difficult situation and are unclear about the right decision, ask yourself:



**If the answer to any of these questions is “no” or “unsure,”  
then stop and seek guidance immediately.**

Employees are encouraged to seek guidance from their local manager, a member of the management team or to contact the Company’s Human Resources, Legal or Compliance Departments.

# Speak up line

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**If you see behavior that you suspect is not right, speak up! Darling Ingredients does not tolerate any form of retaliation.**

## Speak up and help prevent problems

**D**arling Ingredients is committed to our core values, placing integrity and transparency at the center of all we do. We each must be ready to speak up with our questions and concerns so that the Company can address them promptly and professionally.



If something is causing you concern, your first point of contact is your manager. If you feel uncomfortable discussing the situation with your manager, then you should speak to your manager's manager, Human Resources, the Compliance Department or the **Speak Up Line**. To make a report, you do not need to have proof that a violation of our Code, Company policies or the law has occurred.

You may also contact the Chief Compliance Officer by email at [compliance@darlingii.com](mailto:compliance@darlingii.com).

Ignoring problems or not reporting them doesn't resolve issues. When you take action, you help the Company address problems before they harm others and our Company.

## What is the Speak Up Line?

Darling Ingredients provides an option for reporting, including reporting anonymously, through the Darling Ingredients Speak Up Line. The Speak Up Line is a confidential, independent service available 24/7/365 with translation and interpretation support. The Speak Up Line will transcribe the report and forward it to the Compliance Department for review. Your report will be assigned to the appropriate individual for investigation, and you will be able to check the progress of your report or follow up with additional information.



You can reach the Speak Up Line by visiting [diispeakupline.com](https://diispeakupline.com) or by using the contact information on your local Speak Up Line poster. Country-specific, local telephone numbers are available at [diispeakupline.com](https://diispeakupline.com).

## Retaliation

Darling Ingredients does not tolerate any form of retaliation for making a report in good faith or participating in an investigation. If you have suffered retaliation or are aware of retaliation against someone else, you should report it to the Human Resources or Compliance Department or make a report on the [Speak Up Line](#) immediately.

### What retaliation can look like:

- Suspension, layoff, dismissal or the non-renewal, termination or cancellation of employment, contracts, permits and/or licenses
- Demotion or withholding of promotion, negative performance assessment or references
- Transfer of duties, withholding of training, change of location or place of work, reduction in wages or change in working hours
- Imposing or administering any disciplinary measure, reprimand or other penalty, including a financial penalty, and psychiatric or medical referrals
- Discrimination, disadvantageous or unfair treatment, coercion, intimidation, harassment or ostracism
- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income
- Blacklisting based on a sector or industry wide informal or formal agreement that endeavors to keep the targeted person from finding future employment in the sector or industry



### To place a call:

- Dial your country-specific, local telephone number.
- A recorded message in the local language will explain the call process and provide an option to report in English, if preferred.
- An interview specialist will answer the call and, if needed, conference in a translator who speaks your language to assist in reporting your concern.

Reports are kept confidential to the extent possible. The Company conducts appropriate investigations and resolves any issues consistently and fairly. Adhering to the rules of confidentiality may mean that a resolution, including any disciplinary action, will not be shared with the person filing a Speak Up Line report.

**Learn more:** Darling Ingredients' [Speak Up Line](#), and the [Speak Up Line and Retaliation Policy](#)

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Darling Ingredients is committed to providing a safe, respectful and healthy workplace and limiting the impact of our operations on the environment.

## Anti-discrimination

A diverse workforce brings different skills and strengths to our team and is a key to Darling Ingredients' success.

Darling Ingredients' diverse workforce is comprised of people who vary in different ways, including their age, origin, race, color, religion, gender, sexual orientation, disability, national and social status and veteran status. We treat everyone with fairness and respect and promote a professional workplace.

Candidates and employees are fairly and equally evaluated during recruitment, hiring, training and job advancement without consideration of any characteristic that is protected by law.

Darling Ingredients works to create a diverse, equitable and inclusive work environment where everyone is welcome and can be successful. We promote diversity and inclusivity in our hiring practices and recruit a range of talent that reflects the diversity of our communities.

## Compensation

The primary objective of the Darling Ingredients compensation policy is to enable us to retain and recruit a highly qualified workforce.

In determining compensation, the Company takes a variety of factors into consideration, such as the complexity of functions, the scope of responsibilities, the alignment of risks and rewards, and national and international legislation. We treat all employees equally based on the applicable policy and/or (collective) labor agreements.

Discrimination should be reported to your manager, the Human Resources Department and/or the [Speak Up Line](#).

## Anti-harassment

Darling Ingredients is committed to maintaining a professional workplace that is free from harassment, intimidation and violence. To that end, we treat everyone with fairness and respect at all times and never engage in any unwelcome conduct that could create a hostile, offensive workplace. We speak up if we see or experience any harassing conduct.

### We do not engage in unacceptable behavior, such as:

- Sexual harassment, including unwelcome sexual advances, requests for sexual favors and sexual abuse
- Verbal harassment, including the use of abusive language, slurs, jokes, insults, epithets, gestures or teasing
- Disparaging commentary, including making false, misleading or disparaging remarks about individuals, organizations or their products and services (in particular, about Darling Ingredients' competitors)
- Graphic harassment, including showing or sending offensive posters, symbols, cartoons, drawings, photography, computer displays or emails
- Physical harassment, including threats or acts of physical injury, blocking someone's way, damaging property or engaging in unwelcome touching or any other threatening, intimidating or hostile behavior
- Any aggressive behavior, act or threat of violence by or toward any employee, including bringing a weapon into the workplace

Any experienced or observed harassment should be reported to your manager, the Human Resources Department or the [Speak Up Line](#).



### Good question!

**Q.** My manager frequently makes offensive jokes about one of my fellow employees. I don't have to say anything since my colleague can report this behavior if she doesn't like it, correct?

**A.** No. We all have a duty to speak up when we observe behavior that violates our Code or Company policies. If you observe harassing behavior from your manager, even if it isn't directed at you, you should report it to the Human Resources Department or [Speak Up Line](#).



## Human rights

Darling Ingredients respects and defends the rights of individuals throughout the world.

**Our view on human rights is clear and simple. The Company:**

- Prohibits the use of child labor, forced or compulsory labor and human trafficking
- Does not tolerate any form of human abuse or physical punishment
- Honors agreements and follows applicable laws regarding terms and conditions of work and agreed compensation
- Does not do business with individuals or companies who abuse the rights of others or who fail to maintain a safe and healthy workplace
- Follows all applicable local, federal and regional laws

Darling Ingredients expects our supply chain partners to maintain these same standards.

**Learn more:** [California Transparency in Supply Chains Act Disclosure](#), [Human Rights Policy](#), [Supplier Code of Conduct](#)



## Vehicle and travel safety

We drive safely and obey all traffic laws when operating any vehicle for Company business. If your job entails driving responsibilities, you must maintain safe driving records. Where allowed by law, Darling Ingredients may carry out a motor vehicle record check, and the Company reserves the right to refuse to hire an applicant, to discipline an existing employee and to terminate the employment of anyone whose driving record is not satisfactory.

When traveling, we comply with all applicable legal regulations for roads and community travel.





## Substance abuse

Darling Ingredients maintains a safe, drug- and alcohol-free workplace where we, Company customers and the public are safe at all times. The distribution, manufacturing, dispensing, possession and/or use of controlled substances while on Company premises or while performing services for the Company is prohibited.

While alcohol may be served at Company-approved social functions, this should be done only in accordance with local policies and should not threaten anyone's safety.



Tip

There may be times where you are at an after-hours, work-related function where alcohol is being served. Make sure you exercise moderation, good judgment, and comply with all laws and Company policies.



## Health and safety

Darling Ingredients is committed to protecting and nurturing the safety, health and well-being of our employees, customers, business partners and the communities in which the Company operates.

Through engagement and partnership, we work together to recognize, assess and control hazards and risks. We believe in and embrace the following statements:

- Managers are safety leaders. Safety starts at the top, with the Darling Ingredients Board of Directors and senior leadership, and is embedded throughout our Company. Every employee is responsible for health and safety, both individually and collectively, as one team.
- Workplace safety is a requirement. It is not acceptable to choose to place anyone or our Company at risk.
- When we perceive harm to others or question our personal safety, we pause work and review.
- Incident prevention and safety improvement is a continuously evolving process, and we strive to better our performance each day.
- Quality employee training and education is needed to develop, maintain and improve our safety knowledge and culture.
- Data-driven safety targets help the Company achieve its strategic business goals.
- Our safety management process provides a framework that matches or exceeds all globally recognized and regional safety standards.

[Learn more:](#) Commitment to Safety



### Good question!

**Q.** Safety equipment is required where I work, but one of my fellow employees doesn't wear safety glasses. He says they are too uncomfortable. Should I say anything?

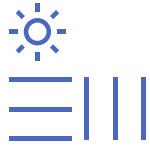
**A.** Yes. We each have a duty to speak up when we see behavior that violates our Code or Company safety policies. We each have a role in promoting safety, so if your fellow employee refuses to follow Company policies, you should report it to your manager.



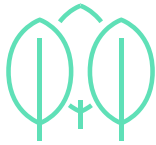
## Environmental

At Darling Ingredients, the Company is committed to limiting the impact of our operations on the environment. To accomplish this, we consistently strive to improve our programs, practices, services, products and compliance. This commitment is in the best interest of our employees, customers, suppliers, shareholders and the communities in which the Company operates.

Darling Ingredients expects our employees, contractors and suppliers to adopt and uphold the following principles:



- Protecting the environment and solving our environmental issues, including limiting pollution at the source; managing emissions, releases and wastes from operations; and making efficient use of natural resources



- Taking action to stop and correct any unlawful or unethical environmental conduct
- Working with our supply chain and business partners to align environmental standards through supply agreements and communication



- Educating ourselves and our customers on the environmentally responsible use of our products
- Supporting the development of responsible standards internally and externally that enhance our environmental principles



- Complying with global environmental laws and regulations
- Actively communicating, implementing and monitoring environmental compliance, using an established Environmental Management System (EMS) that aligns with ISO 14000 principles



- Consulting with stakeholders on environmental, social and governance issues annually through the Shareholder Engagement Process

These listed principles are in addition to our obligation to comply with all other Company policies and standards and all other laws and regulations that apply to our operations globally. Darling Ingredients is committed to publishing an annual sustainability report on the [Darling Ingredients website](https://www.darlingii.com/sustainability).

Executive management and the Darling Ingredients Board of Directors are dedicated to the environmental impact of our operations. Our environmental policy and standards are reviewed by senior management on a regular basis to ensure they are suitable and sustainable for our business. The Company's Board of Directors has quarterly updates on environmental events.

[Learn more: darlingii.com/sustainability](https://www.darlingii.com/sustainability)

# Entrepreneurship and customer value

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**Darling ingredients makes every effort to ensure our products and services are safe, secure and protect the environment.**

## Product quality and safety

Some of our products enter the human food chain, indirectly through animal feed or directly in human food and/or via pharmaceuticals. Our products are also used as ingredients in pet food, fertilizers, fuels and various industrial applications.

Darling Ingredients complies with all applicable food, feed and pharmaceutical safety and quality laws and regulations, including laws and regulations for the export of our products. Darling Ingredients' commitment to quality and transparency ensures that our products are safe to use as ingredients in food, pharmaceuticals and feed.

Darling Ingredients is committed to continually improving our supply chain, processes, products and operations. We monitor and update Company policies and procedures to meet or exceed changes in applicable government standards. All product quality communications must be accurate and truthful. Our facilities' product safety plans help to ensure our products are safe for their intended use and supported by accurately recorded test results.

**Learn more:** [Facility HACCP Plans](#), [Good Manufacturing Practices \(GMPs\)](#), [Quality Policy](#), [Product Safety Plans](#), [Current Good Manufacturing Practices \(CGMPs\)](#)

# Customers and suppliers

Darling Ingredients works with customers and suppliers around the world. The Company's brands are respected and successful because of the quality of our products, our competitive prices and the services the Company provides.

Darling Ingredients supports all of our customers and suppliers fairly, transparently and honestly. We pay particular attention to any special contracting and reporting requirements and other obligations.

Our sales literature and presentations are recognized for their honesty and transparency. To maintain our reputation, it's important that Darling Ingredients works with suppliers who also share our values.

Darling Ingredients also sells and provides services to governments around the world. Government contracts can be more strict than others, so we never cut corners. We deal with local, state and federal governments with integrity and transparency.



Learn more: [Supplier Code of Conduct](#)



Darling Ingredients does business with reputable companies and individuals who are engaged in legitimate business activities. Darling Ingredients expects our suppliers and partners to adhere to the same standards that we do by following our Supplier Code of Conduct and complying with laws. We select partners based on:

- Capabilities and competencies
- Quality
- Compliance
- Traceability
- Integrity
- Reliability
- Competitive pricing
- Products and services



## International trade

Darling Ingredients abides by international trade laws and regulations, including those related to imports, exports, boycotts, embargoes and economic sanctions. We make sure that any transportation of goods, services or technology is not prohibited and that the entities and individuals we do business with are not under sanction.

Darling Ingredients never cooperates with restrictive trade practices that are prohibited or penalized under applicable laws, nor do we participate in illegal boycotts. Please notify the Compliance Department if you ever receive a request, or what could be seen as a request, to boycott.



Tip

- If you have questions about proper registration and labeling of products, ask for guidance and get permission before proceeding.
- Contact your local import/export manager for support if you have questions.
- Keep vigilant and always try to think one step ahead to ensure compliance.



## Sustainability is our business

As the world's leading practitioner of circularity, Darling Ingredients transforms unused resources into valuable ingredients that nourish people, feed animals and crops and fuel the world with renewable energy. Our innovations help reduce landfill and minimize emissions on a global scale.

We continually seek out ways to maximize resources and help move the world toward a more circular economy, while also minimizing our own environmental footprint – making progress year after year.

Darling Ingredients' sustainability goals and progress are reviewed by senior management on a regular basis to ensure they are suitable and sustainable for our business. The Darling Ingredients Board of Directors has quarterly updates on environmental and safety events.

### Corporate Social Responsibility

People are our priority. We continually strive to create a work environment that is safe and engaging, fostering diversity and encouraging career development. Darling Ingredients invests in communities where we live, work and play by providing resources, time and support through contributions, sponsorships and volunteerism.

Learn more: [darlingii.com/sustainability](https://darlingii.com/sustainability)

# Integrity and compliance with the law

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**We protect our reputation and financial interests by complying with laws and regulations.**

## Anti-corruption and anti-bribery

**N**o matter where Darling Ingredients operates or does business, there are global anti-corruption and anti-bribery laws that apply. Bribing government officials, private individuals or private entities, or soliciting or accepting bribes, is always forbidden.

We never directly or indirectly offer anything of value, including gifts and entertainment, to any government official or anyone else for the purpose of:

- Obtaining or renewing business
- Influencing or appearing to influence business decisions
- Securing or appearing to secure an unfair business advantage

These rules apply to all Darling Ingredients business operations and business partners and to anyone acting on our behalf, including but not limited to contractors, intermediaries, suppliers and consultants. If you have any questions or concerns, contact the Compliance Department. If you are uncomfortable reporting suspicious or illegal activity, use the **Speak Up Line**.





## Make sure payments are proper

Any payments made in the course of doing business should always reflect the value of the services provided and be made to a legitimate vendor or supplier for a proper business reason. Make sure all payments are lawful and are recorded accurately and completely.

## Facilitation payments are prohibited

In some places, it may be customary for businesses to make payments known as “facilitation payments” to individual government officials or private sector employees in exchange for expediting a lawful and routine action, such as processing a permit. However, such payments are not allowed by the Company.

By contrast, legitimate service fees paid to government agencies and companies per official fee schedules available to the public are permitted, even to expedite services, such as a rush fee for a visa. Any request for a bribe or facilitation payment must be declined and reported to the Chief Compliance Officer immediately. If you believe your life is in danger, then make the payment but immediately report it and the circumstances to the Chief Compliance Officer.



Tip

Remember that “government officials” refers to many people, not just the representatives you normally think of, including:

- Regulatory agencies and personnel (environmental, tax, customs, etc.)
- Political party officials or candidates
- Employees or representatives of international public organizations and charities, city officials, law enforcement, military personnel
- Employees of state owned or controlled entities



## Good question!

**Q.** I’d like to pay for my contact, who represents a South American, government-owned supplier, and his family to visit a U.S. plant and experience local culture. This shouldn’t be a problem, right?

**A.** This could be a problem. Remember, anti-corruption laws prohibit offering anything of value to government officials. This can include internships for relatives, travel and lodging expenses for family members or even donations to charities foreign officials may recommend. Contact the Compliance Department for pre-approval.

**Learn more:** [Foreign Corrupt Practices Act \(FCPA\) Policy](#)



## Fraud and investigations

Darling Ingredients conducts business in good faith and responds appropriately to investigations or audits in an open, honest and transparent way. We take care to avoid fraud, waste and abuse when using our materials, funds and financial reporting systems, and we always speak up when we have questions or concerns. We also watch for suspicious or unusual transactions or activity that might indicate fraud or money laundering, and report any concerns immediately to the Treasury or Compliance Department.

### Internal and external investigations

Darling Ingredients cooperates in internal and external investigations in accordance with applicable laws. We never alter or destroy records if an investigation or audit has been noticed or is in progress, even if a record retention policy would normally apply.

Contact the Legal Department immediately if:

- An investigation is being conducted by a government agency
- A response to litigation is required
- A request or notice from a government agency is received

Do not discuss an external investigation with anyone, unless instructed to do so by the Legal Department.

### We protect documents relevant to legal matters

We preserve documents and information, including hard copies and electronic records and information, when instructed due to litigation, investigations and other inquiries.

If you possess documents and/or information relevant to such action, you may receive a “legal hold” notice. The legal hold will explain your obligations to preserve such documents and information. Further, you are not permitted to discard any documents or information subject to the legal hold until the Legal Department releases the legal hold.



## Antitrust and global competition

We compete fairly, on our own merits, and we follow global antitrust and competition laws. We are truthful about our products and never make untrue statements about our customers, suppliers or competitors.

We never ask others to provide us with confidential information about our customers, suppliers or competitors.

We avoid conversations with Darling Ingredients' competitors, even in informal settings like trade shows or trade association meetings, that are related to:

- Market share
- Projected sales or production schedules for a product or service
- Pricing strategies or marketing
- Inventories, revenues and expenses
- Unannounced products and services
- Proprietary, confidential or non-public Company information

We're careful about these conversations because verbal agreements could limit competition which could violate competition laws.



### Never engage in the following:

- **Tying arrangements:** selling one product on the condition that the customer buys a second
- **Price discrimination:** charging different customers different prices for the same product with the intent of harming competition in a particular market(s)
- **Predatory pricing:** setting a low price to drive competitors out of the market or to create barriers to entry for new competitors
- **Price fixing:** agreeing with competitors to raise, lower, fix or hold a price for goods or services
- **Market sharing:** agreeing with competitors to divide markets or sell only to customers in certain geographic areas
- **Bid-rigging:** conspiring with competitors on bid submissions to control who will win and lose bids
- **Collusion:** secretly communicating with competitors or agreeing with them on competition efforts

[Learn more: Antitrust and Competition Law Policy](#)

## Giving and receiving gifts and entertainment

Any gift or entertainment given or received should not appear to compromise the recipient's ability to make independent business decisions.

### Giving

- Always give gifts in an open and transparent way – never in secret.
- Obtain the necessary approval(s) before giving any gift, meal, entertainment and/or travel. Approval is granted to a specific individual on a case-by-case basis and cannot be passed onto anyone else.
- Ensure the recipient is allowed to receive it.
- Any entertainment provided should have at least one Company employee in attendance and should be business related.
- Any hospitality, gifts or entertainment expense that is prohibited under Company policy also may not be provided by the Company's third-party agents, distributors or consultants in connection with Company business.



#### DEFINITION: KICKBACK

A kickback is an illicit payment to an individual as compensation for biased representation, improper service or preferential treatment.



## Receiving

- Do not accept individual discounts from third parties for personal gain if the same discounts are not offered to the general public.
- Do not request or solicit gifts from business partners.
- Do not accept improper payments as a form of compensation or for advantageous treatment, e.g., bribes, kickbacks, etc.

## Following our internal controls is important

All gifts and entertainment must be documented, including the name of the recipient and the reason for the expense. Receipts, invoices or other similar records showing actual costs must be submitted with the expense reimbursement in accordance with the Company's policies.

Contact the Compliance Department if you have any questions.



## Tip

Gifts and entertainment given or received must be:

- Ethical and customary
- Permitted by local laws
- Reasonable and modest in value
- Accepted or offered only on an infrequent basis

**Learn more:** [Global Travel and Expense Policy](#), [Foreign Corrupt Practices Act \(FCPA\) Policy](#), [Conflict of Interest Policy](#), [U.S. Political Activity Policy](#)



## DEFINITION: INSIDER TRADING

Insider trading means using material non-public information for a personal financial benefit or to share such information with others who are considering an investment. If you have access to material non-public information, you must not use that information to buy or sell our securities before the general public has access to the same information. Insider trading is also true of material non-public information about another company that you may have access to through your position at our Company.



## DEFINITION: MATERIAL

Inside information that might be material includes earnings estimates, significant business developments, expansion or curtailment of operations, sale or purchase of substantial assets, or other significant activity. It is difficult to describe exhaustively what constitutes “material” information, but you should assume that any information, positive or negative, that might be of significance to an investor, as part of the total mix of available information, in determining whether to purchase, sell, or hold Darling Ingredients stock would be material. Information may be significant for this purpose even if it would not alone determine the investor’s decision.

[Learn more:](#) Insider Trading and Confidentiality Policy

# Insider information and security trading

You must not buy or sell Darling Ingredients Inc. securities, such as our common stock, based on material information that is not publicly available.

## Company information is confidential

All non-public information about our business is confidential. Never disclose confidential information about our Company to family, friends or others, including others within our Company who do not have a business reason to know the confidential information.

## Get pre-cleared and, if necessary, seek legal advice before trading

If you are an executive officer, a member of the Darling Ingredients Board of Directors, or one of the other Designated Officers, as defined in our Insider Trading and Confidentiality Policy, you must get pre-cleared by our SVP Treasurer prior to trading any of our Company’s securities. In any event, if there is any uncertainty or question about the legality of a planned purchase or sale of our stock, contact the SVP Treasurer or General Counsel before making the transaction.



Tip

**Before trading our stock, you must review our Insider Trading and Confidentiality Policy and, if required, obtain pre-clearance from our SVP Treasurer. Also, consider:**

- Do you have any material knowledge about our Company that the general public does not yet have?
- Will you gain any unfair advantage over other investors by trading at this time?

If you answer “yes” to either of these questions, do not proceed and seek immediate guidance from the Legal Department.

## Financial integrity

We record all transactions completely, accurately, fairly and in a timely manner to represent our financial position in accordance with Company accounting policies and principles.

### We are honest and transparent in our financial statements

Our internal accounting controls state that transactions must be:

- Made in the way that they were authorized
- Recorded in the right way to prepare Company financial statements
- Recorded to maintain accountability for assets

We do not make false or unsupported entries in the Company's books and records, and all internal and external correspondence and public communications are accurate, with the Company's consolidated financial statements being a fair representation of the Company's financial position, results of operations, and cash flows. You should report any concerns or violations to the Chief Accounting Officer or the Chief Financial Officer, or you can file a report on the [Speak Up Line](#).

Authorization is required to access Darling Ingredients' systems and financial records. We compare the recorded amounts of Company records to supporting documentation at regular intervals, and take action if we find any variance.

We fully cooperate with external and internal auditors concerning issues related to audit, accounting or financial disclosure. Misleading, influencing or coercing any auditor has serious consequences.

### Maintain and preserve records and business information

Our records must be carefully maintained and disposed of in accordance with the Company's retention schedules and policies that address disposition, storage and destruction.

[Learn more:](#) International U.S. GAAP Accounting Manual



#### DEFINITION: RECORD

A record is defined as all recorded, retrievable information, whether in a hard copy or electronic format, which evidences the development of and compliance with regulatory requirements, business practices, legal policies, financial transactions, administrative activities, business decisions and/or agreed actions, e.g., payroll, timecards, spreadsheets, invoices, logs, reports, etc.

# Transparency and data

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**Our communication  
practices protect  
Darling Ingredients'  
reputation, information  
and data security.**

## Intellectual property

**D**arling Ingredients' intellectual property and identity marks cover all the things we have created as a Company, from names, logos, designs and trademarks to confidential business and technical information.

Darling Ingredients' identity marks (trademarks, logos, product names, etc.) must never be used in a different form than those that have been officially approved. We will consider requests to use or license Company identity marks on commercial products or services from current vendors or third parties who are officially recognized by Darling Ingredients; however, in all cases, prior permission from the Legal Department is required.

To maintain control over the Company's identity marks and the accepted quality of the goods and services that they represent, all official literature and promotional and printed Company materials must align with the Company's corporate style guide and/or be coordinated through the Legal and/or Global Communications Department.

### If something looks wrong, let us know

If you think the Company's intellectual property or identity marks have been used in an unauthorized way, please contact the Legal Department.



# Confidential information

All non-public Company information is confidential, including without limitation, financial information, employee information, prices and customer lists, supplier names and information, contracts, business development opportunities, intellectual property, operational information, processes, procedures, and business, sales and marketing information.

If you are the unintended recipient of information from customers, suppliers, business partners or third parties that's marked confidential or that you suspect may be confidential, you should ask the Legal Department for instructions on what to do with the information. We never use unauthorized information for our benefit. Further, we always honor any promises made to a previous employer to protect their confidential information.

Treat all non-public Company information as confidential both during employment and after leaving the Company. This includes not sharing anything that might benefit any of Darling Ingredients' competitors, including any information competitors could use to impede, disrupt or harm our business. We must also be careful not to accidentally share any Company confidential information by using unapproved artificial intelligence (AI) tools.



## Good question!

**Q.** I emailed a customer and accidentally attached the wrong report that contained information about another customer. I've asked the customer to delete the email, but do I have to do anything else?

**A.** Yes, you must report the incident to your manager and the Legal Department who will confirm if any additional action needs to occur.



## Company equipment and systems

Computers, machinery, tools, Company vehicles, electronic devices and other digital devices are provided by the Company to help us perform our jobs safely and efficiently.

### Computer systems, assets and technology

The Company's computer and communication systems are provided for business purposes. Access is limited to approved purposes and can be restricted for any reason. While the Company does allow employees reasonable use of these systems for personal reasons, such use should be limited and should not interfere with Company business or productivity. As permitted by applicable law, users have no reasonable expectation of privacy with respect to using any materials and electronic devices that are Company property, and any information stored on Company electronic systems may be subject to inspection. Internet browsing is filtered to ensure the Company's information system and data remain secure.

### Machinery, tools, equipment and other physical assets

Company equipment and assets should be used only for Company business and performing job duties. Company equipment and assets should not be used for personal benefit unless such usage has been authorized. Take care to protect and use Darling Ingredients' equipment and assets appropriately.

### Good question!

**Q.** If I set up a personal folder on my computer, can Darling Ingredients still view its contents?

**A.** Yes, the IT Department can access any folder on a Company-owned computer, as allowed by applicable law.



Keep in mind that asset protection can be as simple as not leaving sensitive documents on your desk and/or not leaving your work computer or iPad in your car.

**Learn more:** Information Security Policy for End Users, Mobile Device Policy, U.S. Employee Handbook and Human Resources

## Data privacy

We only collect or process personal data required or necessary for a legitimate business interest or required by (local) law, and only share personal data when legally obligated or when we have a legitimate interest. Darling Ingredients will never sell personal data to third parties.

We carefully secure personal data and comply with all applicable laws and Company privacy policies to ensure that all personal information is protected while we are using, storing, transferring, processing, updating or destroying it. Individuals who handle personal information must comply with all laws regarding disclosures for advance notification, authorization and consent notices. If you have any questions on Company privacy or data protection policies, please contact the Compliance Department.

Any actual or suspected violation of our privacy and data protection policies should be reported to the Cyber Security Team. If you are not comfortable speaking to the Cyber Security Team directly, or you feel your concerns are not being addressed, please use the [Speak Up Line](#).



### Tip

- Be conscious of your surroundings, including when you discuss or work on Company and customer data or information.
- Do not share information with those who do not have a legitimate business need to know.
- Clear system processes or software changes with the Legal or Compliance Department to ensure compliance with data privacy laws.



### Good question!

**Q.** I'm a manager in the U.S. and I supervise an employee in Europe who is retiring. Can I have a copy of his computer hard drive sent to me?

**A.** Hard drives containing pertinent emails and data files that are not subject to privacy regulations can be made available. To gain access to the approved emails and data files, follow the Company's standard termination process, including a data privacy process that verifies personal data isn't forwarded through emails or data files.

**Learn more:** [Information Security Policy for End Users](#), [U.S. Employee Handbook](#), [Guide on Data Protection Policy](#), [Privacy Notice for Employees in the EU and Brazil](#), [Privacy Notice of Applicants in the EU and Brazil](#), [darlingii.com/privacy](http://darlingii.com/privacy) and [California Consumer Privacy Protection Notice](#)



## Good question!

**Q.** My brother works in the sales department of a slaughterhouse that supplies raw material to a local plant, and I work in the purchase department of that plant. Is this a problem?

**A.** Possibly. So please disclose situations like this to your manager. All potential or actual conflicts of interest must be reviewed and approved by the Compliance Department and the applicable internal leader.



### DEFINITION: CLOSELY RELATED PERSONS

A Closely Related Person is defined as an employee's relatives, partners and those living in the same household as the Darling Ingredients employee. "Relatives" means parent, child, sibling, spouse, aunt, uncle, niece, nephew, grandchild, grandparent, and/or cousin, and includes in-laws, foster, or step-relatives.

## Conflicts of interest

Employees must disclose any situations that may put their personal interests, or those of a Closely Related Person, in potential conflict with the interests of the Company. We never use our role at the Company to seek or receive improper personal benefits. The appearance of a conflict can be just as damaging as an actual conflict.

### Situations that could create a conflict of interest

- Having outside activities or other employment that affects your job performance or interferes with your job responsibilities
- Engaging in activities that compete, or appear to compete, with the Company's interests
- Allowing business decisions to be influenced, or appear to be, by personal or your Closely Related Person's interests
- If you or a Closely Related Person personally benefit by your use of Company business opportunities, property, information or resources
- Hiring or having the ability to influence a Closely Related Person's employment opportunities or compensation, or having a direct or indirect management line to a Closely Related Person
- If you or a Closely Related Person work for, provide services to, have a financial interest in or receive any personal benefit from a current or potential supplier, customer, vendor or competitor

When accepting a job at Darling Ingredients or during your employment with the Company, you should avoid and report any possible conflicts of interest. If you are bound by any agreements with a previous employer, such as confidentiality, non-compete and non-solicit agreements, please be open and transparent by informing the Human Resources Department.

**Learn more:** [U.S. Employee Handbook](#) and [Conflict of Interest Policy](#)



## Political participation

We abide by all national laws on political activity. Personal contributions and participation in the political process are encouraged, but Company assets (such as facilities, time at work and use of Company-owned technology) must not be used; your personal support should be provided on your own time and using your own resources. You will not be reimbursed for any contributions made or political activity conducted with your personal funds.

### **We adhere to the laws on Company political activity**

Corporate political activity, which includes donating Company funds to campaigns and lobbying government officials to influence legislation and regulation, is a legitimate business process but is highly regulated and subject to special legal rules. Check with the Compliance Department before you start any political activities.

We do not engage in lobbying or donate Company funds unless we are expressly authorized to do so. Depending on the location, lobbying and contributions may trigger registration and reporting requirements.

We never give Company funds to U.S. federal campaigns or committees. The Company maintains the Darling Ingredients Federal PAC, which oversees federal donations.

[Learn more: U.S. Political Activity Policy](#)



## Communications

When communicating with others, internally or externally, we must do so in a way that reflects our high standards of business and professional conduct.

We avoid communicating any information that is confidential, misleading or damaging to the Company's brand. To avoid releasing non-public information unintentionally, ask a corporate spokesperson to deliver the statement.

Always refer any inquiries from media, government or financial entities to the Senior Vice President of Investor Relations, Sustainability and Global Communications.

### In a crisis, act quickly

In the event of a crisis involving Darling Ingredients' facilities or employees, time is critical. Always cooperate with orders or requests from public officials or law enforcement and follow written policies and procedures. Moreover, remember to immediately notify your manager and the Legal Department. While crisis situations should never be ignored, employees may not make unapproved public comments.

### Good question!

**Q.** There was an incident at the plant that resulted in the police and media coming on-site. Should I talk to the police and reporters if they ask me questions?

**A.** The General Manager should be informed immediately of any incident that results in police or media personnel on-site. You should never speak with the media directly. All media inquiries should be directed to the Senior Vice President of Investor Relations, Sustainability and Global Communications.



Tip

When there is substantial damage to Company assets, or an injury or death is involved, all inquiries should be handled by the Company's corporate spokesperson. Tell reporters you don't have any information you can share, ask them to contact the corporate office and tell your manager.



### Use social media responsibly

When using social media, remember that anything posted can exist forever, so be thoughtful. Our Code and Company policies apply to online activities. Use Company systems with care, as the Company's confidential information could be put at risk.

### Take care with personal communications

Our Code of Conduct and other Company policies also apply to personal communications and social media use. We must exhibit care when we send emails, texts and instant messages or other electronic messages, make phone calls or otherwise communicate externally.

**Learn more:** Information Security Policy for End Users, Mobile Device Policy, U.S. Employee Handbook and Human Resources



When using social media, do not:

- Use corporate identity (Company email addresses) unless conducting Company business
- Give the impression that personal opinions are those of the Company
- Discuss Company business practices or plans
- Share non-public information
- Violate our Code or Company policies

# Our Code of Conduct

**For more information:**

[darlingii.com/policies](https://darlingii.com/policies)

**For questions, please contact:**

**Chris King**

*Senior Vice President and Chief Compliance Officer*

**Joy Janneck**

*Senior Manager of Corporate Compliance*

[compliance@darlingii.com](mailto:compliance@darlingii.com)

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