

ETHICAL DILEMMAS

APPENDIX TO THE CODE OF ETHICS



Daring & Caring Passion & Responsibility The Team

Introduction

This booklet presents dilemmas that illustrate how to deal ethically with situations that are likely to occupy us, the employees and managers at Strauss. It is emphasized that this paper does not purport to encompass the entire range of cases and situations that we deal with in the changing reality in which we live and work.

Naturally, in our everyday lives we occasionally encounter situations that are ethically delicate, and we are uncertain as to how to deal with them.

When should an alarm bell ring?

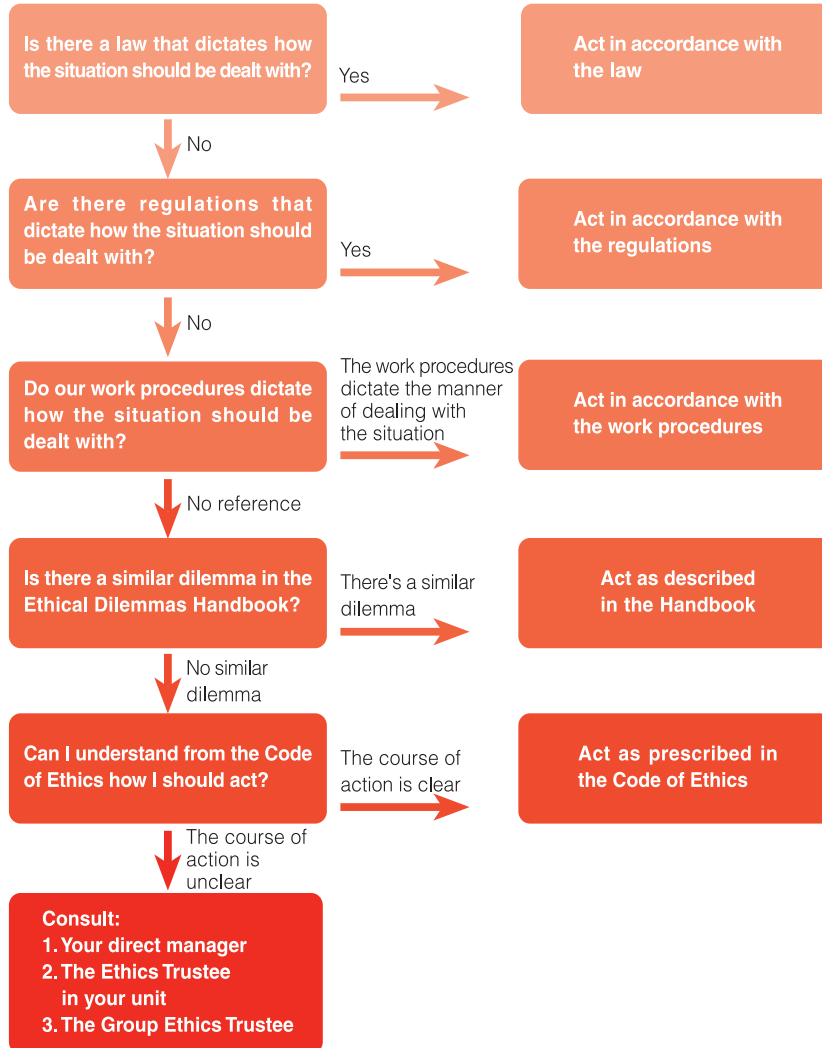
Several sentences indicate that the situation at hand is ethically sensitive:

- "...Okay, we'll do it just this once..."
- "...No one will know..."
- "...Everybody acts this way..."
- "...We've always done it..."

Whenever we encounter a situation of this kind, we should ask ourselves the following questions:

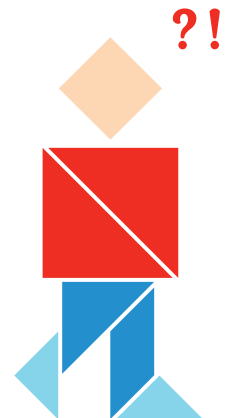
- Can I live with my decision? How would I feel if I were treated this way?
- What would my family or friends say about my decision?
- What would a person whose moral judgment I value do?
- How would I feel if my actions were made public?

When in doubt - there is no doubt. In such cases, we must stop and ask ourselves:



If you suspect that a manager or employee in the Group is violating the contents of the Code of Ethics, you must immediately report this to the Ethics Trustee in your unit or the Group Ethics Trustee. We undertake to protect you from any possible injury as a result of alerting us to your suspicions.

Note: It is not our intention here to encourage an "informant" culture. At the same time, it is important that serious cases of violation of the Code of Ethics are brought to our attention. We rely on you to use your judgment when applying the reporting tools, and on your ability to identify those cases where outside intervention is necessary.



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This means that according to the Code of Ethics no exclusive information should be disclosed to a particular analyst or journalist in the course of a meeting or conference, which is not known to the stakeholder public or which the stakeholder public cannot itself obtain. At the same time, for as long as this principle is upheld, there is no restriction against those parties in the Company whose job this is (such as the Company CEO, CFO or spokesperson) meeting or talking with analysts and the press in order to provide them with clarifications or information that is known to the public.

WORKING AT STRAUSS



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My daughter is getting married in three months' time. Because of my job I am in contact with event producers, owners of banqueting halls and caterers, and I am familiar with the quality of their work. Is there a problem in approaching these professionals in order to obtain quotes for producing my daughter's wedding?

The Strauss Code of Ethics states that: **"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"**.

The difficulty which may arise in the case described above is that these professionals will give Strauss employees a better price in the hope that this will be taken into account next time they have to choose a professional for company functions. One way or another, this may create a semblance of improper conduct and an obligation to that professional. Therefore, it is recommended not to use the abovementioned professionals. In the event that you are nevertheless interested in doing so or if the possible damage to Strauss is unclear, consult the manager in charge and the Ethics Trustee beforehand.

I am the manager of one of the warehouses in the Strauss Group and know a large number of suppliers that work with us. A relative of mine who is opening a small bread factory asked me to recommend suppliers to him. Is there any restriction against giving him information of this kind?

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The Strauss Code of Ethics states that: **"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"**. The Code further states that: **"We do not use inside information for personal gain or for the benefit of any other party"**.

In this case, the concern is that suppliers you recommend will feel obligated to grant your relative terms and conditions that are similar to those they grant Strauss in order to maintain their relationship with you. Therefore, you can provide a list of recommended suppliers, but you must not provide any information on Strauss's trade terms with them, or contact the suppliers and ask them to give your relative preferred terms of any kind because of your acquaintance with them.

It is the practice of suppliers to send various gifts for the holidays. Where is the line drawn between a reasonable and appropriate gift and a gift we do not want our employees to accept? Should a gift such as a bottle of wine be treated the same way as a gift received in cash (even if the financial value is the same)?

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The Strauss Code of Ethics states that: **"At Strauss we give and receive gifts, extend and accept hospitality and other benefits, which are reasonable and proper according to the circumstances and Company procedure, and which are not designed to influence decision-making or create a commitment on the part of the recipient, actually or seemingly"**.

Accordingly, gifts of reasonable and modest financial value may be accepted, according to the instructions of the Ethics Trustee in your unit. Gifts that do not meet these criteria will be returned to the giver, in coordination with the Ethics Trustee in your unit, along with a letter explaining the reason they are being returned.

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As part of my job I am responsible for organizing vacations for the business unit in which I work. In this framework, on many occasions when I arrange a vacation at a hotel I get a superior room due to the fact that the hotel manager is interested in maintaining a good working relationship with me. Is this out of line?

The Strauss Code of Ethics states that: **“At Strauss we give and receive gifts, extend and accept hospitality and other benefits, which are reasonable and proper according to the circumstances and Company procedure, and which are not designed to influence decision-making or create a commitment on the part of the recipient, actually or seemingly”.**

Accordingly, you must thank the hotelier for his offer but decline to accept it, as this may be construed as an attempt by the hotelier to influence your decision-making on subsequent occasions.

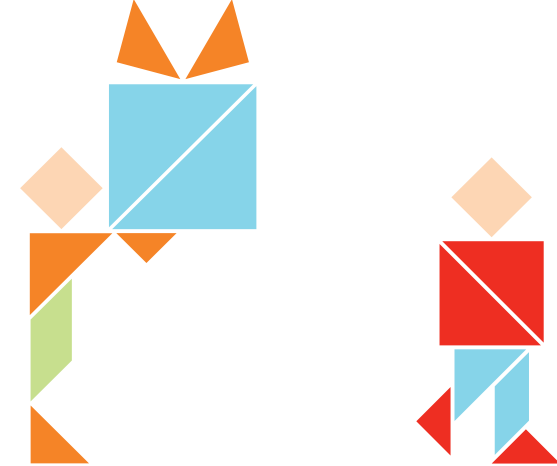
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I am a salesman in the Sales Division. Developing a personal relationship with the customer is very important to the proper course of business. Sometimes this relationship develops outside of work as well, to the point of spending time together socially. Could an ethical problem be created here? Additionally, how should I treat gifts I receive from him on occasions to which I invite him because of our friendship?

The Strauss Code of Ethics states that: **“At Strauss we give and receive gifts, extend and accept hospitality and other benefits, which are reasonable and proper according to the circumstances and Company procedure, and which are not designed to influence decision-making or create a commitment on the part of the recipient, actually or seemingly”.**

There may be a problem with the situation you describe if, due to your relationship, you grant that customer preferred trade terms, despite the fact that he is not entitled to them according to Company procedure. For as long as a situation of this kind is not created there is no restriction against a personal relationship, which is even desirable in order to maintain good relations with our customers. At the same time, in view of the sensitivity in this case, you must not accept gifts from that customer.



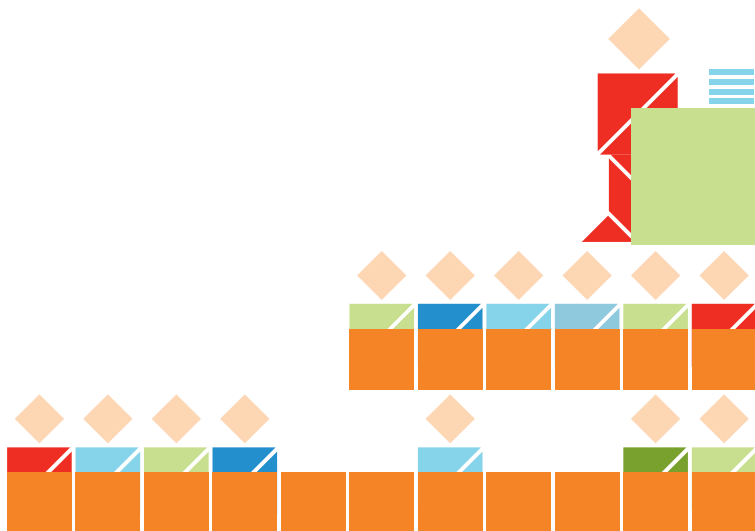
I manage one of the departments in a Strauss factory. My wife gave birth to a daughter last week. One of the employees came to visit and brought a gift that looked expensive. How should I behave? Would the answer be any different if all the employees in the department had got together, collected money and jointly bought a big gift?

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The Strauss Code of Ethics states that: **“At Strauss we give and receive gifts, extend and accept hospitality and other benefits, which are reasonable and proper according to the circumstances and Company procedure, and which are not likely to influence decision-making or create a commitment on the part of the recipient, actually or seemingly.”**

Accordingly, an employee who gives a manager gifts may create a semblance of an attempt to influence decision-making, or to create an obligation on the part of the recipient. Therefore, only gifts of reasonable value should be accepted from employees, as are customary on an occasion of this kind, according to the instructions of the Ethics Trustee in your unit. The answer is different when a joint gift given on behalf of all employees subordinate to you is at issue, for as long as in view of the circumstances the value of the gift is reasonable, because in this case, this is not an attempt to create a personal obligation to the giver.



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As a result of the expertise and reputation I have gained in the course of my work at Strauss, I was recently invited to give several lectures on the subject of marketing in the food industry. I expect to be paid a considerable sum for these lectures. In the lectures, I will of course be representing Strauss. How should I behave?

The Strauss Code of Ethics states that: **“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”.**

Accordingly, you must consult your superior for approval to give the lectures. In any event, you should not accept payment for the lectures.

I work in the marketing department of one of the companies in the Strauss Group. My husband, who until now worked in the marketing department of a communications company, has received a tempting work offer from one of Strauss's competitors. How should I act in this situation?

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The Strauss Code of Ethics states that: **“We do not disseminate privileged information about Strauss, its activities and plans”.**

Accordingly, in general, and most certainly in a sensitive situation of this kind, you must refrain from revealing confidential information about the Group's activities, even to close family members. In a case such as the one described, it is desirable to inform your managers about your partner's change of place of work, and together with them decide how you will deal with the situation.

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Accordingly, you must consult your superior for approval to give the lectures. In any event, you should not accept payment for the lectures.

I work in the procurement department at Strauss. The Company recently issued a tender for the purchase of cardboard packaging for products. My wife's brother has a factory that manufactures quality cardboard packaging. Can I recommend to him that he participate in the RFP (Request for Proposals)?

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The Strauss Code of Ethics states that: **“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”.**

Accordingly, there is no restriction against enabling your family member to participate in the tender. At the same time, to prevent a semblance of a conflict of interest, you must inform the managers of the RFP of your relationship, not be a member of the group of people making the decision on the subject, and make sure that the decision is not influenced by his being a relative of yours.

I work long hours at the office. During the day I sometimes need to make personal phone calls. The Code of Ethics says that the Company's resources and assets must be used exclusively for the good of the Company. Does this mean that I am not allowed to use the office phone for personal needs? Would the answer be any different if I were to ask about using the Company's fax or photocopier?

The Strauss Code of Ethics indeed states that: **"We use the Company's resources and assets responsibly, exclusively for the benefit of the Company"**.

This does not mean that using the phone for personal needs is not permitted at all, but that judgment should be applied and the telephone used only to a reasonable extent in terms of call duration and cost. This is also true with regard to the use of the Company's fax or photocopier. You must apply your judgment and use these appliances only to a reasonable extent. In any case of doubt, ask your direct manager for approval.



I manage one of the production departments at Strauss. Over the years I and one of the veteran employees in the Company who is subordinate to me have developed a close friendship, and we see each other often outside of work as well. Is there anything wrong with this?

The Strauss Code of Ethics states that: **"We conduct our business with a commitment to maintain the highest standards of management, with integrity, credibility and reliability, professionalism and fairness..."**.

Accordingly, as long as your friendship does not affect your working relationship, there is no problem. You must make sure that you do not treat this employee more favorably than others because of your friendship. If you still feel uncomfortable with the issue, we recommend that you consult your direct superior and the Ethics Trustee.

I work in a Strauss plant. One of my home appliances broke down. To repair it, I need a spare part that costs very little but is difficult to find where I live. In the plant there is a large stock of these spare parts and it is clear that if I take one, no one will miss it. I am also willing to pay for the cost. What should I do?

The Strauss Code of Ethics states that: **"We use the Company's resources and assets responsibly, exclusively for the benefit of the Company"**. Accordingly, you should not take any Strauss equipment home, even if its cost is negligible.

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I am a secretary in the Strauss Group. One of the managers in my department has a rather frequent habit of commenting on my clothing style and on my appearance in general. In the afternoons, when people leave, he stands next to my desk and asks me personal questions. I am not interested in a relationship with this manager, and I feel uncomfortable in his presence. At the same time, I am afraid that if I tell him this directly he will pick on me, so I answer him politely. Is his behavior ethically proper? Could I act differently?

There is no need to consult the Code of Ethics to deal with this issue. Strauss's regulations for the prevention of sexual harassment address these subjects. You must contact the Human Resources manager in your unit for advice on the possible courses of action open to you in this case.

At the same time, the Strauss Code of Ethics also makes reference to the subject: **"We are committed to providing our employees with a work environment that is free of threats and violence. We will not tolerate any form of harassment in our midst, including sexual, physical or emotional harassment or harassment related to religious beliefs, origin or customs. We will not tolerate any form of persecution, for any reason".**

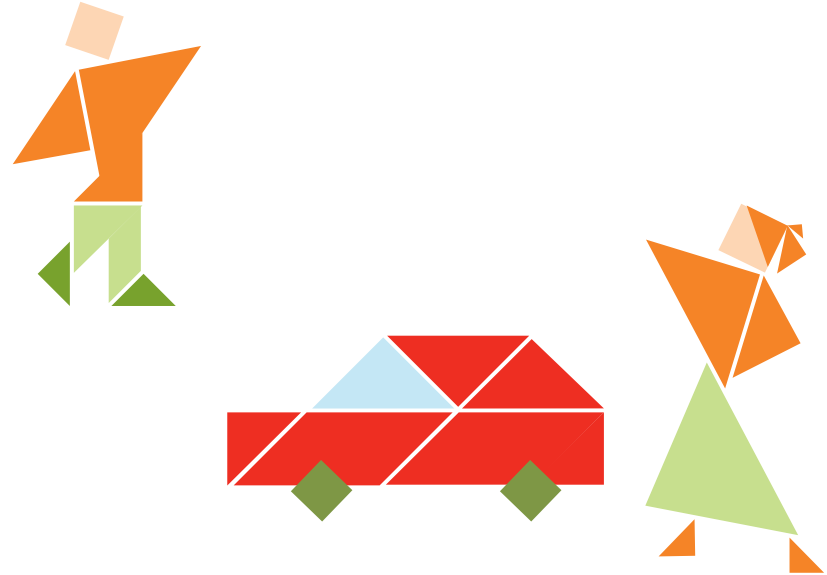
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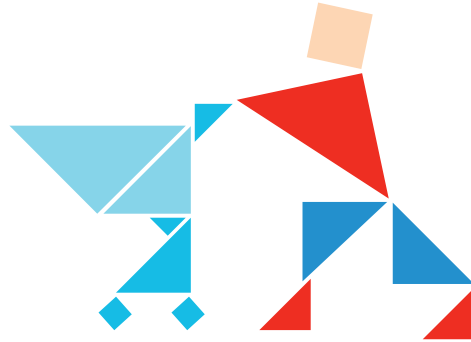
I have been given a Company car by Strauss. I live near my place of work, while my wife lives far away from hers. My wife drives our own car. Consequently, it would be more economical for us that I use our private car and let my wife drive the car I received from the Company. Is this inappropriate? Would the answer be different if the question referred to the use of the car while I am on vacation abroad?

The Strauss Code of Ethics states that: **"We use the Company's resources and assets responsibly, exclusively for the benefit of the Company".**

Accordingly, if the Company car you were given is a functional vehicle that you need to use during your work, then you must drive it to work every day. At the same time, if the car was given to you as part of your employment package, we expect you to apply your judgment and make reasonable use of it. In the case described, it is inappropriate for your wife to use the car regularly. However, she may use it from time to time, in special cases and subject to the appropriate insurance being in place.



WE AND OUR CONSUMERS



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I am a department manager in one of the plants in the Strauss Group. During the work process various instruments test the quality of the raw materials and of the end product. One day one of the operators came to me, saying he had noticed that the color of one of the raw materials was slightly different than the usual shade. The equipment we use did not identify a fault in the material, but on the basis of his acquaintance with the materials the operator thought that there was a deviation from the norm. If I stop production to do tests the fault may possibly be identified, but chances are that this is a very small deviation that will lead to a significant delay in production and consequently, in the plant's output on that day. What should I do?

The Strauss Code of Ethics states that: **"We consider consumer safety a supreme value. We are committed to adopting every measure to supply safe products"**. It further states that: **"We are committed to complying with the highest standards of product quality and to investing efforts in order to achieve continuous improvement in quality"**.

Accordingly, any deviation from the norm must be investigated thoroughly. In the case described, the production line must be stopped in order to understand the nature of the deviation. Only after the deviation has been clarified will a decision be made whether to continue production using the same raw material. In general, the trend is not to approve any deviation from the norm.

I am a sales manager to small customers. Can I sell these customers products that are due to expire in two to three weeks time at a reduced price?

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There is no need to consult the Code of Ethics in order to deal with this question. There is a procedure in place regarding the sale of products with a short expiry date that makes reference to the subject and explains how to deal with it. In these cases, this procedure should be consulted.

The advertising agency I work with recommended an advertising campaign that shows teenagers disturbing the teacher during class. I understood that an advertising campaign of this kind will help the teenagers identify with the product I am advertising. Should I accept the recommendation?

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The Strauss Code of Ethics states that: **"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"**.

Accordingly, we are interested in refraining from commercials of this kind. You must instruct the advertising agency to find a different way to advertise the product.

I am presently working on the planning and design of the packaging for a new product. In the country where the product is to be marketed some of the product marking requirements, as well as the accepted practice, are unclear and allow for a relatively broad range of possible courses of action. Is it enough that I make sure that the product marking is in compliance with the law and custom in effect in that country?

The Strauss Code of Ethics states that: **"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 content and describes it accurately and reliably. We make every effort so that the description of the products we supply meets the needs of the consumer public and does not mislead them"**.

According to the Code of Ethics care should be taken to comply with all laws and regulations in the country where the product is marketed. In cases where the laws and regulations allow for flexibility, we must choose the stricter alternative and the one that provides information to the consumer that is more complete and more accurate and does not mislead him. We are interested in being leaders in this area, rather than simply aligning with the accepted custom in the countries where we operate. In any case of doubt, contact the Ethics Trustee or the Chief Legal Officer.

After we had manufactured the packaging for one of our products it turned out that the information on the packaging in regard to product content was not accurate. In certain periods we use a different ingredient, identical in terms of nutritional value, instead of one of the ingredients listed on the wrapper. Producing more packaging will cost a lot and reduce the product's profitability. The marketing people claim that there is no logic in printing other wrappers, because the consumer is not being delivered a product that is inferior to what he was promised. What should we do?

The Strauss Code of Ethics states that: **"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 content and describes it accurately and reliably. We make every effort so that the description of the products we supply meets the needs of the consumer public and does not mislead them"**.

Incorrect marking of one of our products is liable to significantly damage our consumers' trust in regard to the entire range of products we manufacture. The marginal impairment of the profitability of that product is negligible compared to the damage that is liable to be caused to our image if this inaccuracy becomes evident. Accordingly, it must be verified that the product content information on our products is accurate and reliable, even if this comes at the expense of a localized impairment of profitability.

I am a marketing manager in Strauss. The organizers of an event whose goal is to further the interests of one of the political parties in the country have asked me to sponsor the event. What should I do?

The Strauss Code of Ethics states that: **"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"**.

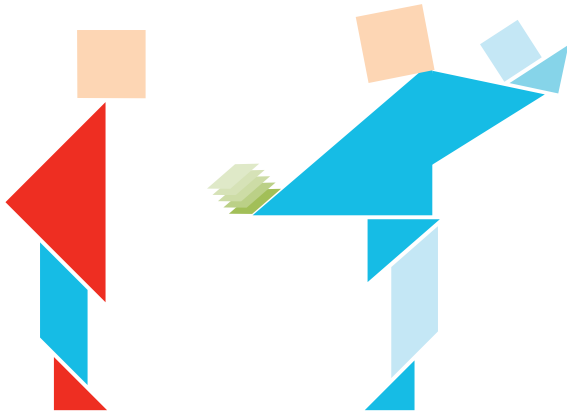
Accordingly, as the political preferences of our stakeholders are many and diverse, we must refrain from sponsoring and supporting organizations that are identified as politically active. We are not interested in being involved in political activity of any kind.

I am a marketing manager in one of the business units in the Group. I recently learned in the course of conversation at a social gathering that a group of consumers who are sensitive to a certain type of food mistakenly think that one of our products is suited to their needs, although we do not expressly declare this, and neither do we perform any tests to prove that this is in fact the case. How should I act?

The Strauss Code of Ethics states that: **"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 content and describes it accurately and reliably. We make every effort so that the description of the products we supply meets the needs of the consumer public and does not mislead them"**.

Accordingly, in the case described, you must inform the relevant department manager of this, to ensure that the situation is addressed immediately.

SUPPLIERS AND CUSTOMERS



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I work in the procurement department. I recently learned that a higher quality raw material than the material I buy from one of our suppliers is available at the same price. The raw material we have used until now meets all standards and consumer requirements. Additionally, I know that Strauss is the most important customer of the supplier from whom I buy that material. On the other hand, buying the better quality raw material will improve the quality of the product we manufacture without raising its price. I spoke to the supplier, who told me that at present he is unable to improve the quality of the raw material he supplies to me. What should I do?

The Strauss Code of Ethics states that: **“We are committed to complying with the highest standards of product quality and to investing efforts in order to achieve continuous improvement in quality”**. The Code further states that: **“We are committed to treating our suppliers and customers with integrity and respect for their rights. We are committed to fairness in negotiations between us and in our regular day-to-day dealings”**.

In this case, the present supplier should be given the chance to improve the quality of the raw material he supplies to you. Only after it has been established that the present supplier is unable to comply with the new conditions should you switch to another supplier.

I signed an agreement with one of my customers, referring, among other things, to the credit terms that will be granted to that customer. At that meeting the customer asked me if customers of the same size receive similar credit terms. How should I answer this question?

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The Strauss Code of Ethics states that: **“We are committed to treating our suppliers and customers with integrity and respect for their rights. We are committed to fairness in negotiations between us and in our regular day-to-day dealings”**.

Accordingly, you must negotiate fairly and not make statements that are incorrect. In answering a question of this kind you must emphasize that each customer's credit terms are determined on the basis of business considerations, which among other things include the scope of that customer's purchases, its financial robustness, etc. Moreover, in a case such as this you should not make statements to the customer such as, "You receive the best credit terms we offer", if this is untrue.

In negotiations with a supplier, one of the main things influencing the terms and conditions of the agreement with that supplier is the forecast quantity we will buy from him. Sometimes at the time of negotiations the forecast is uncertain, but it is clear that the price will drop the more the quantity increases. How should we act in this case?

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The Strauss Code of Ethics states that: **“We are committed to treating our suppliers and customers with integrity and respect for their rights. We are committed to fairness in negotiations between us and in our regular day-to-day dealings”**.

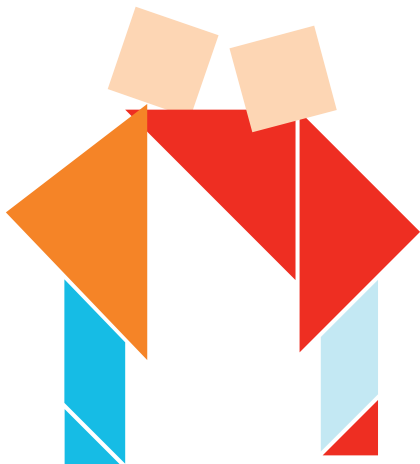
Accordingly, you must only promise the realistic quantity you expect to buy from the supplier and not make false promises about the quantities you anticipate buying. Additionally, if you have committed to buying a certain amount but your forecasts are revised as time passes, and you anticipate that you will need a smaller quantity, you must inform the supplier of this as soon as possible so that the supplier can make the necessary preparations, even if you are not bound by an agreement to purchase the entire quantity.

During a visit to the plants of one of our suppliers I saw workers handling hazardous materials without any protective means.

When I asked the manager of the company about this he laughed and said that sometimes it's better to simply keep quiet. This is one of our biggest suppliers, and my relationship with them has been in place for many years. What should I do?

The Strauss Code of Ethics states that: **"We are committed to taking action to ensure that our suppliers' conduct is based on proper ethical standards"**.

Accordingly, you must bring the subject to the attention of the Group's procurement manager, so that he can clarify the matter thoroughly with that supplier and demand that he improve the work safety conditions of his employees, as a condition for continued collaboration.

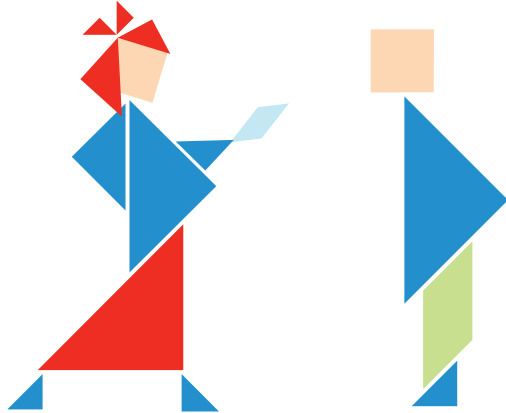


One of our customers contacted me and asked for information on his competitors. I am interested in preserving a good relationship with that customer. How should I behave?

The Strauss Code of Ethics states that: **"We are committed to treating our suppliers and customers with integrity and respect for their rights. We are committed to fairness in negotiations between us and in our regular day-to-day dealings"**.

Accordingly, disclosing confidential information about the activity of one of our customers to a competitor of that customer is damaging to the customer's trust in us and is prohibited.

COMPETITION



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A journalist from one of the major newspapers contacted me for my comments on a statement by one of our competitors, who disparaged the new product we started selling this month. That same competitor claimed that our product is far inferior to his own, in the parameters of price and quality. How should I act?

The Strauss Code of Ethics states that: **"We are committed to adhering to fair and fitting "rules of the game" in our relations with and versus our competitors. We will not slander them, their actions or their products"**.

Accordingly, we must refrain from smearing our competitors or their products, and in general, refrain from mentioning them. You can respond to the statement by the competition pertinently by enumerating the many advantages of your product.

I hired an employee who until recently worked for one of our business rivals. I believe that he has a lot of information which may be of great interest to us about that rival's activity. Can I check this information with him?

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The Strauss Code of Ethics states that: **"We are committed to adhering to fair and fitting "rules of the game" in our relations with and versus our competitors..."**.

Accordingly, you should refrain from asking an employee who formerly worked for a rival for details and confidential information about that rival's activity. This will put the employee in an uncomfortable position, and we are not interested in obtaining information about the activity of our competitors in this way.

THE ENVIRONMENT



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The residents living in the vicinity of the plant where I work have for several years complained about the smells emitted by the plant as a result of production activity. The subject has been investigated and it was found that the smell does not pose a health problem. There is no law that prescribes how we should act in this case. Does the Code of Ethics make any reference to the subject?

The Strauss Code of Ethics states that: **“We are committed to taking action in order to improve our environmental performance, everywhere we operate”**. It also states that: **“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”**.

Accordingly, impairment of the quality of life of the residents who live near our plants must be avoided. Their complaints must be thoroughly investigated and action taken to deal with the inconvenience they are caused, even if there is no law that obliges us to do so.

I am the manager of a production department at one of Strauss's plants. Recently, due to the meticulousness regarding product quality, the technologists have become stricter about the cleanliness of the production line. Accordingly, we clean the work surfaces more often, using larger quantities of chemicals. Although this greatly reduces the chance of impairing product quality, it no doubt increases the amount of chemicals we use that are hazardous to the environment. What is more important?

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The Strauss Code of Ethics states that: **“We are committed to complying with the highest standards of product quality and to investing efforts in order to achieve continuous improvement in quality”**. However, it also states that: **“We are committed to taking action in order to improve our environmental performance, everywhere we operate”**.

As a manager at Strauss, the Company expects you to be aware of the complex requirements of the production process. Accordingly, you are expected to act in order to balance different needs, in this case – the quality requirements, which are expressed in the technologists' request for additional cleaning, and the needs of the environment.

The optimum course of action would be to try and locate environment-friendly detergents that are less harmful than the existing chemicals. If the cost calculation is unsuitable, you can devise a plan that combines the existing detergents and friendly ones in a manner that complies with the technologists' strict quality requirements and does not increase the harm caused to the environment through the excess use of chemicals.

THE COMMUNITY IN WHICH WE OPERATE



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I am a senior manager in the Company. Because of my job, I am often approached by acquaintances with requests for donations of cash or products. Is there any restriction against my approving donations of this kind using my budget, or alternatively, asking the Company's donations coordinator to approve them?

The Strauss Code of Ethics states that: **“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”**. At the same time, elsewhere in the Code it says: **“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”**.

Accordingly, you must refer your acquaintances to your direct manager or directly to the manager in charge of donations in the Company, without interfering with his judgment or influencing the decision made in any way.

I am the manager of one of the plants in the Strauss Group. I recently learned that residents in the area are complaining of traffic problems caused by the Company's trucks as they enter the plant, and by Company employees coming to work in the morning. I am concerned that if I suggest discussing the matter with the residents I will open up a Pandora's Box that I won't be able to deal with. What should I do?

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The Strauss Code of Ethics states that: **“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”**.

Accordingly, in cases such as this the complaints of the residents of the area should not be ignored. A thorough discussion must be held with their representatives in order to try and find a solution to the problems that are bothering them.

IMPLEMENTING THE CODE OF ETHICS IN STRAUSS



I suspect that one of my colleagues is receiving kickbacks from suppliers in return for buying goods from them. Should I do anything, and if so, what?

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In this case you must approach your direct manager or the Ethics Trustee in your unit, or (if you are concerned that the matter may be leaked in your business unit) the Chief Ethics Trustee of the Strauss Group. The Company is committed to handling every complaint with all due seriousness, to protecting whoever has given warning of a violation of the Code of Ethics, and to preventing any injury to that person as a result.

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I am deliberating how I should act in regard to a particular issue. I read the Code of Ethics and the accompanying papers and did not find an answer to my question. What should I do?

In the first stage, you should approach your direct manager or the Ethics Trustee in your unit. A list of the Ethics Trustees in the business units is posted in the Intranet site or the Ethics Corner in your unit. If these two people do not succeed in giving you a satisfactory answer, you can contact the Chief Ethics Trustee of the Strauss Group.

