

The Code of Business Ethics and Conduct for Vendors

of

Burger King SEE (Switzerland) AG

Burger King SEE (Switzerland) AG and any of its affiliated companies (collectively, the “**Company**”) are committed, very simply to “doing what’s right.” “Doing what’s right” means that everything we do to achieve our key business strategies must be done with the highest standards of ethics, honesty and integrity. Our philosophy is simple: integrity, honesty and compliance with the law are not optional. When it comes to ethics there is no compromise.

We live and work alongside our constituents, and value their interests as our own. Fundamental respect for all people, and our planet, guides our corporate conscience. The Company is committed to diversity and inclusion, dignity for all workers along our entire supply chain, food safety and animal welfare, sensitivity towards the environment, and a spectrum of civic and charitable priorities that promote our shared future in the communities we serve.

We also believe that our vendors and suppliers (“**Vendors**”) should observe the same philosophy in their actions and relationships affecting the Company. While the Company recognizes that there are different legal and cultural environments in which Vendors operate throughout the world, the Company has established this Code of Business Ethics and Conduct for Vendors (this “**Code**”) to set forth the basic requirements you **MUST** meet with respect to your performance as a Vendor to the Company. All Vendors must comply with this Code and must ensure that their subcontractors, including sub-assembly factories that produce products or materials for the Company, comply with this Code. Compliance with this Code is in addition to, not in lieu of, any Vendor obligations set forth in any agreements between a Vendor and the Company or its designated purchasing agent. Additionally, compliance with this Code is each Vendor’s individual responsibility and we recommend that you regularly communicate this Code and its requirements to your officers and employees.

I. BUSINESS INTEGRITY

Compliance with Laws and Regulations

Vendors must operate in full compliance with the laws of their respective countries and with all applicable rules, regulations, customs and published industry standards applicable to them, including those relating to labor, worker health and safety, freedom of association and the environment.

Anti-Bribery and Corruption

Vendors must not pay bribes, accept kickbacks, engage in extortion, fraud or embezzlement, or take any other action that would violate, or cause the Company to violate, any applicable anti-bribery or corruption laws or regulations.

Conflict of Interest

Vendors are expected to disclose to the Company any existing or prospective situation that presents an actual conflict of interest or that could have the appearance of a conflict of interest, in relation to its role as a Vendor to the Company. This includes situations in which a Company employee or contractor has an interest in, or economic ties with, the Vendor's business, or otherwise attempts to obtain personal benefit by virtue of his or her position.

Gifts and Entertainment

Working together means that sometimes our Vendors may engage in business-related entertainment with Company employees or other representatives. There may also be instances in which small gifts or promotional items may be exchanged in the normal course of business. Such activities may be acceptable as long as they are reasonable, both in cost and scope, are conducted in the best interest of the Company in connection with the Company's business, and are not intended or expected to, and do not, influence the Company's business-related decisions. It is important that Vendors refer to any agreements between them and the Company, which may contain greater detail and restrictions regarding gifts and entertainment.

Confidential & Proprietary Information

Vendors must not disclose the Company's confidential or proprietary information or trade secrets to other parties, except as specifically authorized by a Company officer or when disclosure is required by law. Confidential or proprietary information includes information of a sensitive and proprietary nature, trade secrets and other non-public information of the Company. Vendors are also prohibited from (a) taking for themselves opportunities that are discovered through the use of the Company confidential or proprietary information and (b) using the Company's confidential or proprietary information for personal gain.

Use of Trademarks and Domain Names

Any use of the Company's trademarks or trademarks licensed to the Company or domain names by Vendors requires the Company's written approval prior to use.

II. WORKING CONDITIONS

Diversity, Discrimination and Harassment

The Company values, honors and respects differences and diversity in its employees, sub-franchisees, customers and vendors. The Company expects its Vendors to provide a work environment that offers equal opportunity to its employees and that is free from unlawful discrimination or harassment; one in which each employee is treated with dignity and respect. No form of discipline involving corporal punishment, abuse or harassment (whether psychological, sexual or verbal) is permitted, and disciplinary measures must comply with local laws and internationally recognized human rights.

Forced Labor

The Company believes that employment should be freely chosen. Accordingly, the Company has zero tolerance for involuntary labor of any kind and will terminate its business relationship with any Vendor who uses involuntary labor or purchases from any subcontractor who uses involuntary labor of any kind. In addition, Vendors must not subject their employees to any restrictions on their freedom of movement unrelated to the conditions of their employment, including requiring their employees to surrender any government-issued identification, passports or work permits as a condition of employment.

Child Labor

Every worker employed by a Vendor must meet the applicable minimum legal age. Each Vendor must comply with all applicable child labor laws, including those related to hiring, wages, hours worked, overtime and working conditions.

Wages & Hours

Vendors must ensure that workers are paid at least the minimum legal wages or the local industry standard, whichever is greater. While it is understood that overtime is often required in mass production, Vendors shall carry out operations in ways that limit overtime to a level that ensures humane and productive working conditions. Workers may not be required to work more than six days per week but may do so voluntarily. Additionally, Vendors must pay overtime and any incentive rates that meet all legal requirements or the local industry standard, whichever is greater. If local laws do not provide for overtime pay, hourly wage rates for overtime must be at least equal to the rates for the regular work shift.

Health and Safety

Vendors must provide all of their employees with a safe and healthy working environment and, where provided, living environment. Vendors must comply with all applicable laws regarding working conditions, including worker health and safety, sanitation, fire safety, risk protection, and electrical, mechanical and structural safety. At a minimum, Vendors must provide potable drinking water, clean and accessible restrooms, adequate lighting and ventilation, fire and emergency exits, essential life safety equipment, emergency aid kits and access to emergency medical care. In addition, Vendors should establish their own health and safety policies and should take all reasonable steps to implement adequate health and safety measures to protect workers from workplace accidents and injuries.

Freedom of Association

Vendors must respect the rights of their employees to associate, or not associate, with any group, and must comply with local laws regarding employees' rights to freely join and form workers' organizations. Vendors must not threaten, penalize, or discriminate against employees based on union membership, or make employment conditional on relinquishing union membership or an agreement not to join a union.

Employment Status

Vendors are required to comply, and to ensure their employees' compliance, with all applicable immigration laws and regulations, and must only employ workers who are legally authorized to work in the jurisdiction in which the Vendor operates. Vendors are expected to verify their employees' work authorization status, and to maintain records to support their verification.

III. SUSTAINABILITY

Food Value

The Company is committed to providing guests with high quality and great-tasting food. The Company unwavering commitment to food safety and food quality requires that Vendors share in that commitment. At a minimum, Vendors must meet product quality and food safety standards mandated by applicable laws and regulations, must comply with the Company's product quality and food safety requirements, and must meet or exceed industry standards for product quality and food safety.

Environment

The Company embraces its responsibility to the environment and is committed to doing its part with respect to energy, water and waste, and expects its Vendors to do the same. All Vendors are required to comply with applicable local and national laws and regulations in relation to the protection of the environment. Vendors are also encouraged to establish procedures to manage, measure and, where possible, reduce factors related to their environmental impact, including energy usage, fossil fuel usage, water usage, wastewater and solid waste (including by-products and hazardous waste), air emissions (including greenhouse gases) and handling of hazardous substances, and to provide reports on such procedures to the Company as may be requested. Additionally, Vendors' factories must have an environmental management system or plan. The factories must also have procedures for notifying local community authorities in case of accidental discharge or release of hazardous materials or any other environmental emergency.

Responsible Sourcing

The Company believes in responsible sourcing at all levels of its supply chain. The Company commitment also extends to improving animal welfare and working toward the elimination of deforestation. The

Company expects Vendors to assist in meeting its commitment to responsible sourcing. Upon request, Vendors are required to provide clear, timely and accurate reporting to the Company regarding the origins and facilities within their supply chain. Vendors are also encouraged and, in some instances, expected to demonstrate their own commitment to responsible sourcing by participating in initiatives and roundtables, and by putting into effect transition plans aimed at aligning their operations with the Company's responsible sourcing commitments

IV. COMPLIANCE

Monitoring and Enforcement

As a condition of doing business with the Company, each and every Vendor must comply with this Code. Vendors are expected to maintain appropriate records to demonstrate their compliance with this Code. The Company shall have the right (but not the obligation) to monitor compliance with this Code, including the right to conduct, or have its designee conduct, unannounced inspections of Vendors' facilities and records. If the Company determines that any Vendor has violated this Code, the Company may terminate its business relationship with the Vendor or require the Vendor to implement a corrective action plan.

Reporting Violations

Vendors are responsible for promptly reporting to the Company any known or suspected violations of this Code, including any violations by an employee, officer, agent or subcontractor of the Company or a Vendor.

No Third-Party Beneficiary Rights

This Code is intended only to confirm the basic requirements that must be met by Vendors to the Company and shall in no way be construed as conferring, or in any way granting rights of any kind to any third party.

Acknowledgment

The Vendor agrees that providing goods and/or services to the Company constitutes an acknowledgment by Vendor that it understands the requirements set forth in this Code, is in compliance with all requirements of this Code and will continue to comply with such requirements during the time it is an active Vendor to the Company.