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| Title: US DOE Financial & Organizational Conflict of Interest Policy | Policy Owner:Chief Ethics and Compliance Officer |
| Date of Issue:January 13, 2025                                       | Effective Date:January 13, 2025                  |

I. POLICY OVERVIEW

As a recipient of a Project for which financial assistance funding is sought or received from the U.S. Department of Energy, Kraft Heinz (the "Company") is required to identify and mitigate any potential, actual, or perceived financial or organizational Conflict of Interest ("COI") that might arise from work to be performed by Company under all such Projects.

Under DOE's Interim COIP (r)-1.3-1.35E>4ight01 -0.001 Tw 1 Tw -20.366 -1.3-]an Tw 2.73234-20.366 -1.3-]/T

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3. Each Subrecipient that works on or supports the Company's DOE Financial Assistance Award.

B. What is a Conflict of Interest? DOE's Interim COI Policy identifies two types of conflicts of interest: (1) a Financial Conflict of Interest; and (2) an Organizational Conflict of Interest, both defined below

C. Interaction with Kraft Heinz's Global Conflict of Interest Policy This policy supplements Kraft Heinz's existing Global Conflict of Interest policy

#### IV. DEFINITIONS

This policy utilizes the following definitions in accordance with DOE's Interim COI Policy.

"Award, Financial Assistance Award or Federal Award" means the same as the definition provided in 2 CFR 200.1 for Federal Award.

"Contracting Activity" means an organizational element that has the authority to (t o)3.8 (f)0 eo"7.3 (y4)3.4 (f



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personnel by the Non-Federal Entity in the application for financial assistance, approved budget, progress report, or any other report submitted to the DOE by the Non-Federal Entity under this policy.

“Significant Financial Interest” means:

(1) A Financial Interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's Non-Federal Entity Responsibilities:

(i) With regard to any foreign or domestic publicly traded entity, a *significant financial interest* exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.

(ii) With regard to any foreign or domestic non-publicly traded entity, a *significant financial interest* exists if the value of any remuneration, not otherwise disclosed as current, pending, or other support, received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest)

(iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.

(2) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available) related to their institutional responsibilities that is not otherwise disclosed in current and pending or other support disclosures, provided that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a Federal, state, or local government agency of the United States; a domestic Institution of Higher Education; or a domestic research institute that is affiliated with a domestic Institution of Higher Education.

(3) The term *significant financial interest* does not include the following types of Financial Interests: salary, royalties, or other remuneration paid by the Company to the Investigator if the Investigator is currently employed or otherwise appointed by the Company, including intellectual property rights assigned to the Company

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Institution of Higher Education; or income from service on advisory committees or review panels for a Federal, state, or local government agency of the United States, a domestic Institution of Higher Education, or a domestic research institute that is affiliated with a domestic Institution of Higher Education.

“Subrecipient” means an entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award but does not include an individual that is a beneficiary of such award. A Subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

V. REQUIRE



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