

Code of Conduct of Gubor Schokoladen GmbH (Gubor-Group) for our business partners

The following companies are part of **Gubor Schokoladen GmbH** (Gubor Group):

Rübezahl Schokoladen GmbH, Dettingen u. Teck, **Hans Riegelein & Sohn GmbH & Co. KG**, Cadolzburg,
Wergona Schokoladen GmbH, Wernigerode, **Weseke Dragees GmbH**, Borken, **Eichetti GmbH**, Werneck,
Pomorskie Pralinki sp. z o.o., Tuchola, Polen, **Riegelein France SAS**, Paris, Frankreich

This Code of Conduct defines the fundamental principles for cooperation with the Gubor Group's business partners and describes our expectations regarding human rights and environmental due diligence. It serves as a clear orientation for responsible corporate behaviour and forms the basis for long-term and successful cooperation. As part of our corporate due diligence and responsibility towards legal requirements, we define and describe below the attitude and requirements for human rights and environmental due diligence in our own business area and along the supply chain.

The business partner commits to complying with human rights and environmental due diligence obligations in addition to the international guidelines for the protection of human rights and the environment and takes into account the requirements of the German Supply Chain Due Diligence Act (LkSG).

The Code of Conduct of the Gubor Group is oriented according to the following international guidelines and principles:

- UN Guiding Principles on Business and Human Rights (UNGP)
- Principles of the United Nations Global Compact (UNGC)
- OECD Guidelines
- 17 Sustainable Development Goals (SDGs) of the United Nations (UN)
- Core Labour Standards of the International Labour Organization (ILO)
- United Nations Convention on the Rights of the Child (UNICEF)
- amfori BSCI Code of Conduct / BEPI Principles
- SEDEX (Supplier Ethical Data Exchange) – SMETA
- Paris Agreement (UNFCCC)

The national laws and regulations applicable in the respective countries in which business activities are conducted must be observed. The principles set out in the Code of Conduct must be observed.

1. Social responsibility

1.1 Respect for human dignity and prohibition of forced labour

Any form of forced labour, slavery, involuntary prison labour or human trafficking will not be tolerated. Employees must be able to leave the employment relationship at any time with reasonable notice. Furthermore, no unacceptable treatment of employees, such as psychological hardship, sexual and personal harassment and humiliation, may take place. The hiring or use of security guards must be prohibited if persons are treated in an inhumane or degrading manner or are injured during their deployment or if freedom of association is impaired.

1.2 Prohibition of child labour

No use of child labour as defined by ILO and UN conventions and/or national law is permitted. The minimum age for the employment of minors shall not be below the applicable age of compulsory schooling and shall be at least 15 years, unless ILO exceptions apply. Children's right to education must be respected. Children and young people under the age of 18 may not be employed during the night or in situations that expose them to unsupervised risks or unreasonable strain.

1.3 Fair remuneration

Wages must be paid on time, regularly and in full. Deductions from wages as disciplinary measures that are not authorised by national legislation may not be made without the express consent of the employee concerned. All disciplinary measures must be recorded. Business partners must ensure that employees receive clear, detailed and regular written information on the composition of their remuneration.

1.4 Fair working hours

Working hours must comply with the applicable laws or industry standards. All employees must be granted at least one day off after six consecutive working days. The weekly working time must not regularly exceed 48 hours. It must be ensured that all employees comply with the legally permitted working hours and break times and can take their paid holidays.

1.5 Freedom of association

Freedom of association and the right to form or join an organisation that respects the rights of employees must be upheld. These include the right to strike and the right to collective bargaining. Employee representatives must not be discriminated against and must be able to execute their representative function in the workplace. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be granted. Your employee representatives must be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful way.

1.6 Equal opportunities and prohibition of discrimination

No form of discrimination, harassment, bullying or unequal treatment will be tolerated. The personal dignity, privacy and personal rights of everyone must be respected. It must be ensured that there is no discrimination or unequal treatment in recruitment, remuneration, professional training and development opportunities, termination of employment because of age, gender, disability, nationality, religion, marital status, sexual orientation, trade association membership or political affiliation.

1.7 Health and safety protection

Our business partners must ensure a safe and healthy working conditions for their employees. The necessary precautionary measures against accidents and damage to health that may arise in connection with the work must be taken by setting up and applying appropriate occupational safety systems. Suitable measures must be taken to prevent excessive physical or mental fatigue. Employees must be regularly informed and trained on applicable health and safety standards and measures. In addition, employees must have access to clean drinking water in sufficient quantities and to hygienic sanitary facilities.

2. Ethical business practices

2.1 Business integrity

The business partners of the Gubor Group undertake to comply with all applicable legal provisions regarding corruption, bribery, extortion and fraud. Any form of corruption, bribery, extortion and fraud will not be tolerated. Furthermore, they undertake to comply with the statutory provisions on the prevention of money laundering and terrorist financing and not to support these.

2.2 Fair competition, compliance with competition and antitrust laws

The Gubor Group complies with the applicable rules of competition and antitrust law and the principle of fair competition and expects the same from its business partners. When dealing with competitors, the applicable antitrust laws prohibit agreements and other activities that influence prices or conditions as well as agreements between customers and suppliers that are intended to restrict customers in their freedom to determine their own prices and other conditions for resale. The Gubor Group disapproves of such practices and expects the same from its business partners, all material and immaterial goods must be respected.

2.3 Avoiding conflicts of interest

To protect interested parties and the interests of the Gubor Group, business partners must immediately disclose any conflicts of interest. This includes business actions or decisions that could be influenced by personal or private interests. The disclosure of conflicts of interest does not result any personal disadvantages for the persons involved.

2.4 Export controls and economic sanctions

Business partners of the Gubor Group must strictly comply with all applicable regulations and laws governing the import and export of goods, services and information as well as payment transactions. In business activities, existing sanctions and embargoes are observed within the framework of the laws and regulations.

3. Environmental responsibility

3.1 Compliance with environmental protection laws

The business partners must comply with the relevant environmental protection laws and regulations with the intention of preventing and minimising environmental risks. The company complies with the requirements of waste legislation as well as immission and water protection. In addition, all regulations relating to hazardous substances must be complied with by our business partners. This applies to storage, handling and disposal of hazardous substances. Employees must be informed and trained in the handling of hazardous materials and substances.

3.2 Handling and discharging industrial wastewater

Wastewater from operations, manufacturing processes and sanitary facilities must be monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater.

3.3 Handling air emissions

General emissions from operations (air and noise emissions) and greenhouse gas emissions must be routinely monitored and reviewed with the intention of minimising them. Business partners should also monitor their exhaust gas purification systems and are encouraged to find economical solutions to minimise any emissions.

3.4 Handling of waste and hazardous substances

Business partners must follow a systematic approach to identify, handle, reduce and responsibly dispose of or recycle solid waste.

The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. Chemicals or other materials that pose a risk if released into the environment shall be identified and managed in a manner that ensures safety during handling, transport, storage, use, recycling or reuse and disposal.

Mercury shall be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended.

3.5 Sustainable resource management

The use and consumption of resources during production and the generation of all types of waste, including water and energy, must be reduced or avoided. This can be achieved through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by economising, by recycling or by reusing materials.

3.6 Handling energy consumption/efficiency

The business partners are required to monitor and document energy consumption. Economic solutions must be found to improve energy efficiency and minimise energy consumption.

3.7 Animal protection and animal welfare

When using animals, care must be taken to ensure that they are kept in a manner appropriate to their species and welfare and that they are protected from suffering and fear. Compliance with the applicable animal welfare regulations must be ensured.

3.8 EU regulation on deforestation-free supply chains (EUDR)

Regulations (EU) 2023/1115 on deforestation-free supply chains (EUDR) requires companies to ensure that certain raw materials (such as wood, coffee, cocoa, soya, palm oil, cattle products or rubber) do not come from illegal deforestation or unsustainable land use. We therefore expect business partners to take appropriate measures to check their supply chains, accordingly, identify and avoid human rights and environmental risks and create transparency about the origin of relevant products.

3.9 Environmental protection, climate responsibility and the promotion of biodiversity

Negative environmental impacts are to be avoided within the scope of economically justifiable measures or minimised if avoidance is not possible. Environmental and climate protection and the preservation of biodiversity are integral components of corporate responsibility and require continuous improvement. This includes the ongoing optimisation of resource efficiency and measures to avoid waste. The business partners undertake implement suitable and appropriate measures to promote environmental sustainability as part of its business activities.

4. Responsibility and commitment

4.1 Datenschutz, Vertraulichkeit und Schutz von geistigem Eigentum

The business partners undertake to fulfil the reasonable expectations of the Gubor Group and its employees with regard to the protection of confidential information. The business partners are required to agree appropriate confidentiality agreements with the Gubor Group to ensure appropriate protection of confidential information received. They must ensure that all legal requirements relating to data protection and information security are complied with when processing, recording, storing, transmitting and passing on personal data. In addition, the business partners of the Gubor Group undertake to respect intellectual property rights.

4.2 Risk management

From our business partners, we expect the introduction and application of an appropriate risk management system aimed at compliance with human rights and environmental due diligence obligations in their own business area and along the entire supply chain. The aim is to identify relevant risks at an early stage, prevent them, minimise them or put an end to existing violations. Effective risk management includes the regular and ad hoc performance of risk analyses, the follow-up of information and complaints and the implementation of suitable preventive and remedial measures. We also expect a continuous review and further development of the measures taken to ensure their effectiveness.

4.3 Complaints mechanism

The Gubor Group is committed to complying with and guaranteeing a transparent and open complaints mechanism. This is done in accordance with the German Whistleblower Protection Act (HinSchG) and the German Supply Chain Due Diligence Act (LkSG). We encourage our business partners to report any legal violations in the Gubor Group's area of responsibility as soon as they are observed or are highly likely to occur. Business partners need not fear any disadvantages, provided that the respective report is made to the best of their knowledge and with honest intent.

A suspected case or violation can be reported via our whistleblower system using the following link:

[Gubor Group Reporting Channel | Whistleblowing Channel](#)

We expect from our business partners that it is also possible at any time to report and process human rights or environmental risks and possible violations in a secure and confidential manner in their business area.

5. Acknowledgement and Compliance with the Code of Conduct

We expect our business partners to consider and respect the principles of sustainability, human rights and environmental strategy set out in the Code of Conduct in the context of our business relationships.

The Gubor Group reserves the right to investigate any reasonable suspicion of a breach or violation of this Code of Conduct and to demand remedial action if necessary. In the event of ineffective and inappropriate remedial measures or in the event of a serious breach, this may lead to the termination of the business relationship.

As the Gubor Group, we strive for long-term business relationships based on partnership, with the common goal of making a sustainable contribution. If you have any questions or comments, please do not hesitate to contact us at any time (nachhaltigkeit@gubor.de).

We thank you and appreciate your support and your commitment to sustainable and responsible business activities.