



Ulmer Schokoladen GmbH & Co. KG  
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# Supplier Code of Conduct 2024

The path to a sustainable, social and economic cooperation



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## Preamble

Ulmer Schokoladen is a family business that is committed to its ecological and social responsibility. As an internationally operating manufacturer of chocolate products, this responsibility relates to a supply chain that requires extensive measures to fulfil due diligence obligations.

The guiding principles for our actions are set out in our internal code of conduct and the Ulmer CSR guidelines. They represent the basic building blocks for sustainable, social and economic cooperation. Due to our commitment to our customers to act according to these guiding principles, the Ulmer management is obliged to ensure compliance with comparable standards from its business partners, suppliers and service providers (hereinafter collectively referred to as “suppliers”).

In accordance with the requirements of the Supply Chain Due Diligence Act (LkSG) and the EU Deforestation Regulation (EUDR), Ulmer Schokoladen has created this Supplier Code of Conduct (SCoC). The requirements are described below.

## 1. Requirements and Basic Principles

Ulmer Chocolate respects all applicable national and international laws and regulations and expects the same from its business partners. These include legal regulations such as the Supply Chain Due Diligence Act (LkSG) as well as the requirements of the UN Convention on Human Rights, the guidelines on Children's Rights and Business Principles, the United Nations guidelines on business and human rights, the international labor standards of the International Labor Organization (ILO) and of the United Nations Global Compact. If different regulations apply side by side, the one that guarantees the highest level of protection and safety for employees must be applied.

As a responsible company, both in social, ecological and ethical matters, it is important to us that our business partners also share our values. Legally compliant actions, the sustainable use of resources and a respectful treatment of employees are always in the foreground. We also want to meet the increased requirements for the transparency of supply chains, climate protection and the ban on deforestation.

The business partner undertakes to impose the following requirements of the SCoC to the same extent on its upstream suppliers and agents along the supply chain.

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## 2. Human Rights and Social Responsibility

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All employees must be treated with dignity and respect. We demand that our suppliers protect internationally recognized human rights and follow the UN Guiding Principles on Business and Human Rights and the core labor standards of the International Labor Organization (ILO). The actions of our suppliers must therefore also comply with the law on corporate due diligence to avoid human rights violations in supply chains (LkSG § 2 Para. 2).

### 2.1 Working conditions, hours and wages

We expect our suppliers to ensure fair working conditions and to strictly adhere to prevailing regulations regarding working hours and vacation regulations. Overtime is only allowed within the legal framework. Local laws and regulations regarding maximum working hours and vacation time must be respected by the supplier. To ensure that everyone can live in dignity and humanely, employees are entitled to appropriate remuneration for the work they do. We therefore demand payment of the legally defined minimum wage or other corresponding comparable values. Precarious employment practices are unacceptable. The threat of reprisals or disciplinary measures does not fit with our corporate philosophy and is highly rejected by us.

### 2.2 Harassment and discrimination

The supplier must prevent any form of harassment, such as sexual harassment, sexual abuse, physical punishment, psychological or physical coercion or verbal abuse, by all means. Regardless of their personal characteristics, including gender, skin color, ethnic or social origin, genetic characteristics, language, religion or belief, political or other opinion, membership of a national minority, property, birth, disability, age or sexual orientation, every individual or group must be treated equally.

### 2.3 Freedom of assembly and collective bargaining

We expect our suppliers to give their employees the opportunity to assemble peacefully and join forces, especially in the political, trade union and civil society areas. Which also includes the right to form trade unions and to bargain collectively to protect their interests. In cases where freedom of association and the right to collective bargaining is restricted by law, alternative options for an independent and free association of employees for the purpose of collective bargaining must be granted.

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## 2.4 Forced labor and human trafficking

No forced labor, slave labor or similar work may be used. All work must be voluntary and carried out without threat of punishment. Employees must be able to end their work or employment relationship at any time. In addition, unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation, are strictly forbidden. The commissioning or use of security forces must be prohibited if, during the deployment, people are treated inhumanely or degradingly, are injured, or if freedom of association is impaired.

## 2.5 Child labor and young workers

Child labor is strictly forbidden at any stage of the supply chain. Suppliers are required to adhere to the requirements of the ILO conventions on the minimum age for the employment of children (according to ILO Convention 138). Accordingly, the age should not be less than the age at which compulsory education ends according to the law of the place of employment and in any case not less than 15 years. If young workers under the age of 18 are employed, they are not allowed to do night work or overtime. In addition, young workers are not allowed to carry out activities that are mentally, physically, socially or morally dangerous or that impair their schooling. To this end, we carry out regular and event-related risk analyzes with particular care and strongly condemn any violations.

## 2.6 Health protection and occupational safety

The supplier is responsible for a safe and healthy working environment. The necessary precautionary measures against accidents and damage to health that may arise in connection with the work shall be taken by setting up and applying appropriate occupational safety systems. Appropriate measures must be taken to prevent excessive physical or mental fatigue. In addition, employees are regularly informed and trained on applicable health and safety standards and safety measures. Employees are provided with access to sufficient quantities of drinking water and access to clean sanitary facilities.

## 2.7 Respect of land resources and tenure rights

The supplier may not, in violation of legitimate rights, withdraw land, forests or waters whose use secures the livelihood of people. The supplier must refrain from harmful soil changes, water and air pollution, noise emissions and excessive water consumption if this harms the health of people, significantly impairs the natural basis

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for food production or prevents people from having access to safe drinking water or sanitary facilities.

### 3. Business Ethics

Ulmer Schokoladen complies with the OECD Due Diligence Guidance for Responsible Business Conduct and demands the same from its business partners.

#### 3.1 Anti-corruption, fair competition and antitrust law

The business partner is committed to a sustainable economy that is free from corruption, extortion, exploitation, unfair conduct and behavior and embezzlement. Internationally applicable antitrust guidelines and other regulations governing fair competition are complied with. These should be the fundamental values for cooperation in all areas of business. Any form of direct or indirect bribery or acceptance of advantages, whether by accepting or making payments, gifts or benefits of any kind beyond the legal framework and the customary level, is not permitted. The Supplier shall comply with the statutory regulations on the prevention of money laundering and shall not itself participate in money laundering activities.

#### 3.2 Business integrity, business relationships and accounting

At Ulmer Schokoladen, we attach great importance to long-term, respectful and responsible business relationships. This requires honesty and integrity in business dealings as well as the timely fulfillment of obligations and liabilities. The supplier respects the legal requirements for proper accounting and undertakes to transmit business-relevant data correctly. Suppliers ensure that their work results meet the relevant quality standards and have established procedures to identify and avoid deviations.

#### 3.3 Business secrets and data protection

If business partners receive confidential information, they are obliged to maintain confidentiality regarding all business and trade secrets as well as other internal confidential matters. Confidential information includes both information that is marked as such and information that is not publicly known and should not be made public, for example because it could be of use to competitors or could harm Ulmer Schokoladen or other business partners if disclosed. The duty of confidentiality applies both during the term of the contractual relationship and after its termination.

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Confidential information must be protected from unauthorized access by third parties. Within the company, the business partner must ensure that confidential information may only be passed on to those employees who need it to fulfill their duties and who are obliged to maintain confidentiality in a corresponding manner. All applicable data protection laws must be complied with at all times.

### 3.4 International trade controls

Suppliers must comply with the export control regulations applicable to their business and provide accurate and truthful information to customs and other authorities as required.

## 4. Ecological Responsibility

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The environment also belongs to future generations. It is therefore our responsibility to act in an ecologically responsible and resource-conserving manner. The supplier complies with all applicable laws and regulations, EU regulations and international standards for the protection of the environment. This includes all environmental aspects that are taken into account in the EMAS Regulation (No. 1221/2009) and ISO 14001:2015. The business partner is required to organize its business processes accordingly and to proactively reduce adverse effects on the environment and climate change.

### 4.1 Sustainable use of resources and animal welfare

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 is done either directly at the point of origin or through procedures and measures, e.g. by changing production and maintenance processes or procedures within the company, by using alternative materials, by making savings, by recycling or by reusing materials. The respectful treatment of animals is part of the supplier's corporate responsibility. The supplier shall comply with all applicable animal welfare laws.

### 4.2 Energy and water consumption

Business partners undertake to continuously reduce climate-damaging emissions. Energy consumption must be monitored and documented wherever possible. Economic solutions must be found to improve energy efficiency and minimize energy consumption. In order to track this in a comprehensible and transparent manner, direct carbon emissions (Scope 1) and indirect emissions (Scope 2) should be measured if possible. We also encourage our suppliers to participate in the development and use

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of climate-friendly products and processes in order to contribute to the reduction of greenhouse gas emissions.

Suppliers make reasonable efforts to reduce water consumption in their own operations and value chains. The way water is used should not have any negative impact on the availability and quality of water for the environment and neighboring communities.

#### 4.3 Waste management, noise and exhaust emissions

The supplier shall have measures in place to reduce both waste and wastewater wastewand to treat them in accordance with all legal requirements. Waste shall be recycled as far as possible. Further harmful noise and air emissions must be prevented or reduced as far as possible. When handling chemicals and hazardous substances, the supplier shall ensure responsible handling with regard to environmental and health protection. The requirements of the Basel, Minamata and Stockholm Conventions on the export, use and disposal of chemicals and other hazardous substances must be strictly complied with.

#### 4.4 Deforestation, land use and forest-based raw materials

Suppliers shall make every effort to achieve sustainable production where raw materials, packaging and auxiliary materials of agricultural or forestry origin are involved. In accordance with the EU Deforestation Regulation (EU) 2023/1115, we require our suppliers to take all possible measures to ensure that all relevant raw materials and products are produced **without deforestation, without exception**. Accordingly, business partners undertake not to participate in the deforestation of native vegetation for agricultural purposes. Deforestation of any kind is particularly unacceptable to us in the following areas: primary forests (such as rainforests), riparian vegetation, wetlands, swamps, floodplains, steep slopes and high above-ground carbon reservoirs. To this end, transparency and traceability must be created along the entire supply chain and cooperation between the individual stakeholders must be strengthened. Measures must also be defined in the event of non-compliance. We give preference to suppliers who are committed to certified, sustainable agriculture and forestry as part of their land and forest use (see also 4.5 Protection and promotion of biodiversity).

#### 4.5 Protection and promotion of biodiversity

We expect our suppliers who use natural raw materials in their production processes to ensure that biodiversity is protected in the cultivation, extraction and processing of natural raw materials and that protected ecosystems, animal and plant species, natural

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habitats and existing interactions are not damaged. Agricultural systems that contribute to animal and plant biodiversity and climate resilience, such as agroforestry systems, should be promoted. The development of resilient agricultural and food systems should be integrated into the environmental management systems of our suppliers in order to be able to withstand extreme weather conditions, among other things.

## 5. Compliance

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Compliance with this code of conduct is regularly checked by the supplier itself. For the practical execution of the code, Ulmer Schokoladen has expanded its own sustainability management and added the necessary risk management to comply with our due diligence obligations. Risk management in accordance with LkSG §4 is now a core component of our internal control system (ICS) and is carried out based on regular and event-related risk analyses. An internal sustainability officer is responsible for executing and enforcing the required risk management.

Ulmer Schokoladen is entitled to check compliance with this Code of Conduct itself or through authorized third parties at the business partner's premises and/or to demand the submission of documents proving compliance with the Code. The business partner is obliged to tolerate and support these inspections. The business partner shall designate a contact person who can provide information on compliance with the Code.

In addition, Ulmer Schokoladen provides a complaints mechanism through which affected persons can inform Ulmer Schokoladen of human rights and environmental risks and the violation of corresponding obligations that have arisen as a result of the actions of its own business division or suppliers. The business partner also undertakes to have installed an internal complaints mechanism that can be used confidentially and anonymously in order to effectively protect whistleblowers about grievances in their own company and along the supply chain. As soon as the business partner discovers violations of this Code of Conduct by itself, its suppliers, agents or subcontractors, it shall report these to Ulmer Schokoladen without being asked to do so.

In the event of non-compliance with the Code, the business partner is obliged to take immediate remedial action within a reasonable period of time. In the event of a culpable breach, Ulmer Schokoladen reserves the right to withdraw from or terminate the contract without prejudice to further claims.

With each acceptance of an order, the business partner tacitly confirms to comply with the principles and requirements of this Code of Conduct for all deliveries to Ulmer Schokoladen.

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