



# **Our Code of Conduct**

**Code of Conduct of the Mederer Group**

**April 2024**



# Introductory words from the management

We, the Mederer Group, are committed to responsible and sustainable corporate governance. We expect and demand of ourselves and our employees that they observe and comply with the principles of ecological, social and ethical behavior. We expect the same behavior from our suppliers and business partners.

We have set ourselves the goal of continuously and permanently developing our entrepreneurial activities. We also ask you as our suppliers and business partners to contribute to this. By acknowledging this Code of Conduct, both contracting parties accept the validity of the following regulations as the basis for all current and future business relationships. The contracting parties undertake to comply with the principles and requirements of this Code of Conduct.

The following Code of Conduct of the Mederer Group covers all activities of Mederer GmbH as the parent company of Trolli GmbH Germany and all subsidiaries worldwide.

**Robert Mähler**  
CEO / Speaker

**Sabine Arazi**  
COO

**Fabrice Brettnacher**  
CFO / Compliance Officer

# I. The Mederer Group as an employer

## Our Code of Conduct





# 1. Compliance with international standards

## The Mederer Group as an employer

The Mederer Group upholds the human rights of its employees, customers, suppliers and other stakeholders as set out in the Universal Declaration of Human Rights (UDHR).

It is committed to complying with the core labor standards of the International Labor Organization (ILO) and the 10 principles of the UN Global Compact.

Its company(ies) observe the OECD Guidelines for Multinational Enterprises (Organisation for Economic Co-operation and Development) in their economic and social activities.

Where required, the companies of the Mederer Group also comply with the requirements of the German Supply Chain Due Diligence Act (LkSG).

The Mederer Group expects its business partners to comply with all relevant laws and regulations as well as the requirements of this Code of Conduct.



## 2. Labor and ethical standards

### The Mederer Group as an employer

The relevant national laws and industry standards apply with regard to weekly working hours and remuneration for work performed. This includes, for example, laws on minimum wage or overtime. If the statutory minimum wage is not sufficient to cover the cost of living, we undertake to pay a wage that is sufficient to cover basic needs.

Deductions from wages as a disciplinary measure are not permitted. The basis on which workers are paid is communicated to employees on an ongoing basis in the form of a pay slip. The statutory social benefits must be granted.

Remuneration must be paid on time, regularly and in full in a legal tender. Deductions are only permitted under the conditions stipulated by law or collective agreements.



### **3. Equal opportunities and respect**

#### **The Mederer Group as an employer**

Appreciation, openness and respect are practiced at the Mederer Group.

Discrimination on the basis of nationality, citizenship, pregnancy or parenthood, marital status, sexual orientation, skin color, gender, disability, veteran status, religion or belief, age, racist reasons, social/ethnic origin or political views, insofar as the latter are based on democratic principles and tolerance, or other legally protected reasons, must be excluded.



## 4. Health and safety at work

### The Mederer Group as an employer

The Mederer Group creates a safe and healthy working environment for its employees.

In order to avoid accidents at work and health hazards caused by work, all applicable occupational health and safety rules must be observed and preventive health protection measures must be taken.

The consumption of alcohol and drugs of any kind or form is prohibited at all Mederer Group sites.



## 5. Freedom of association

### The Mederer Group as an employer

The right of all employees to form and join trade unions in a free and democratic manner and to engage in collective bargaining must always be respected.

Trade unions must be allowed to operate freely and in accordance with the law of the place of employment; this also applies to the right to strike. In countries where free and democratic trade union activity is not permitted, the right to freedom of association and collective bargaining must be taken into account by allowing employees to freely elect their own representatives who can enter into a dialog with the company on workplace issues.

Employee representatives must not be denied access to or interaction with employees.





## 6. Young workers

### The Mederer Group as an employer

The worst forms of child labor are always prohibited for employees under the age of 18 (in accordance with ILO Convention No. 182).

These include, but are not limited to, all forms of slavery and practices similar to slavery, the use of unauthorized activities and any work which, by its nature or the circumstances in which it is carried out, is likely to be harmful to the health, safety or morals of children or young people.

If employees under the age of 18 are employed, their working hours must not interfere with their participation in vocational training programs recognized by competent authorities.

# II. The Mederer Group as a company

## Our Code of Conduct





# 1. Quality assurance

## The Mederer Group as a company

The Mederer Group works according to the highest quality principles in development and production in accordance with legal requirements and technical regulations.

The legal requirements for placing our products on the market are always observed and our products are also tested internally by our experts. The health and satisfaction of our customers is our top priority. Any risk to the health of our customers must be avoided at all costs.



## 2. Sustainability and environmental protection

### The Mederer Group as a company

The Mederer Group is aware of its responsibility towards the environment and society and has set itself the goal of constantly improving its own environmental performance. Sustainability is the goal and basis of our business activities.

All applicable environmental protection laws and corresponding regulations must therefore be complied with. The environmental impact of all processes must be kept to a minimum and natural resources must be used sparingly and carefully. This applies in particular to the handling of waste, hazardous chemicals and emissions as well as water protection.



### **3. Avoiding conflicts of interest**

#### **The Mederer Group as a company**

**Business decisions must always be made independently and in the interests of the Mederer Group and conflicts of interest must be avoided.**

**There may be situations in which professional responsibility conflicts with personal interests. This may occur if there are personal or financial relationships with suppliers, service providers, competitors or subcontractors. If a conflict of interest arises, this must be disclosed to the manager and the compliance officer.**



## 4. Donations and sponsorship

### The Mederer Group as a company

The Mederer Group supports selected projects and charitable organizations. In order to ensure transparency and rule out conflicts of interest, donations and sponsorships, as well as any other charitable work, are only made after internal review and approval. No donations or sponsorships may be made that could damage the reputation of the Mederer Group.



## 5. Choosing business partners

### The Mederer Group as a company

The Mederer Group works with qualified suppliers, sales partners and service providers ("business partners"), which it selects carefully and according to objective criteria.

It places the same demands on its business partners as it does on itself. The principles and values contained in this Code of Conduct form the basis for cooperation with our business partners.

In its procurement processes, the Mederer Group pays attention to responsible procurement practices in the areas of environmental protection, ethics and human rights.

# III. The Mederer Group as a market player

## Our Code of Conduct







# 1. Fair competition and fair advertising

## The Mederer Group as a market player

The Mederer Group is committed to fair and undistorted competition and complies with the applicable competition and antitrust laws.

The standards of fair business activity, fair advertising and fair competition must be observed.

Agreements of any kind with competitors on prices, terms and conditions and market allocation are not permitted. This includes not only written agreements, but also informal discussions and agreements or the exchange of information that have the purpose or effect of restricting competition. Agreements with customers and suppliers may also not contain any restrictions of competition; in particular, influencing resale prices is not permitted.



## 2. Preventing corruption

### The Mederer Group as a market player

The Mederer Group does not tolerate corruption or bribery. All employees must behave in such a way that no personal dependencies or obligations arise between them and representatives of business partners and customers.

It is prohibited to accept, demand, offer or grant benefits in return for improperly influencing business decisions. Benefits, such as gifts and invitations, may only be offered or accepted to an appropriate extent in compliance with internal guidelines.

The value limit for incoming gifts is EUR 30. Gifts of a higher value must be rejected with reference to the compliance rules.

However, no benefits of any kind may be offered to authorities and public officials.

# 3. International trade and money laundering prevention

## The Mederer Group as a market player



The Mederer Group also sells its products abroad and operates worldwide.

It complies with the applicable customs and foreign trade laws for the import and export of goods, services, information and technologies.

It only accepts money from legal sources. Employees must report any indications of the concealment of the origin of money, such as unusual payment methods, to the Compliance Officer.



## 4. Confidential information and property rights

### The Mederer Group as a market player

The intellectual property rights relating to the production and recipes of our confectionery are assets that make up the Mederer Group as a company. All employees must treat this information confidentially and protect it from access by third parties. This applies both during employment with the Mederer Group and beyond. In this way, we protect our competitive edge.

Employees of the Mederer Group must treat information from customers and business partners of which they become aware in the course of their work for the Mederer Group with equal confidentiality. In addition, the intellectual property rights of other market participants must be respected.



## 5. Data protection and IT security

### The Mederer Group as a market player

When processing personal data, the provisions and requirements of data protection law must be complied with. The Mederer Group is committed to the basic principles of data protection: lawfulness, processing in good faith, transparency, purpose limitation, data minimization, accuracy, storage limitation, integrity and confidentiality as well as the accountability of the controller.

It also ensures the security of the stored data through appropriate technical and organizational measures.



## 6. Complaints management

### The Mederer Group as a market player

From 01.01.2024, all interested parties will have access to a complaints management system in accordance with the requirements of the German Supply Chain Due Diligence Act (LkSG).

The complaints management can be reached as follows

- Internet address: <https://trolli.de/en/social-responsibility/>
- Postal:  
Trolli GmbH  
For the attention of the complaints office  
Oststraße 94  
90763 Fürth  
Germany

The anonymity of complainants is guaranteed at all times.

# Notes

For reasons of better readability, the Mederer Group generally uses only one gender form in this Code of Conduct. Nevertheless, it addresses all genders (male, female, diverse) equally.

## Acknowledgement of the business partner

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Place, date

Company, stamp

