

## RICOLA CODE OF CONDUCT

Ricola Group AG and its direct and indirect subsidiaries (hereinafter referred to as the “**Ricola Group**”) are reliable brand manufacturers of premium-quality Swiss specialist herb products that enjoy an undisputed reputation and a high level of trust in the markets they operate in due to their clearly focused range and years of tradition. This positioning is based on strict compliance with clear principles. To ensure this positioning in the future, all current and future actions taken by the Ricola Group will align with the following basic values:

quality, integrity, honesty, fairness, respect, trust, performance, teamwork and compliance with legal and official requirements.



The Code of Conduct applies to the Ricola Group, to all of its employees and all of its business partners.

The Code of Conduct sets minimum standards. If stricter regulations issued by legislators or relevant institutions (e.g., associations) must be observed for the Ricola Group’s business activities either on a general, national or local level, these shall take precedence.

## OUR PRINCIPLES

### Quality

We only manufacture products of the highest quality that meet our customers' needs.

Our products and manufacturing processes are in line with the applicable regulations and specifications as well as all specifications of the Ricola Group. We also ensure that our manufacturing processes are state-of-the-art and that our products meet the highest safety standards.

### Honest practices

We always act with integrity, honesty and transparency, which is why we market and advertise our products truthfully and in line with respective laws.

All of our product descriptions and prices must be truthful and correct. We do not make false or misleading statements in our marketing practices and, in particular, we do not mislead consumers through advertising, labeling, packaging or promotions. We only compare Ricola with competing products based on undisputed facts.

### Resources and financial integrity

We treat all resources with care, protect all assets of the Ricola Group and only use them in the intended, appropriate and permitted manner.

We use all resources in a sustainable way. We protect our intellectual property and respect that of third parties. We comply with legal and regulatory requirements on how assets are to be used, and we adhere to the corresponding requirements of the Ricola Group. We document all business processes and transactions in a truthful, precise and complete way. We implement effective control mechanisms.

### Fairness and respectful interaction with and among employees

We treat our employees fairly, equally and with respect.

We respect and value the diversity and individuality of our employees and create a working environment in which all employees, regardless of their personal characteristics – such as nationality, gender, age, ethnicity, religion, sexual orientation, disability or personal preferences – can fully contribute to the good of the Ricola Group. We do not tolerate discrimination of any kind.

### Fairness and respectful treatment of business partners

We behave in a loyal and cooperative manner towards our business partners, including suppliers and sales partners. We aim to maintain strong, trusting and respectful collaborative relationships.

In the relationships with our business partners, we strive for long-term partnerships that focus on performance and value creation, with sustainable development prospects for the Ricola Group and its respective business partners. All relationships between Ricola and its business partners are based on fairness, integrity and sustainability.

## No conflicts of interest

Personal interests must not impact our judgment or decision-making in business activities.

Ricola Group employees must inform their superior about any actual or potential conflicts of interest. New employees are requested to disclose all existing or potential conflicts of interest before starting work. The same applies to the interests of business partners who are or may be in conflict with the interests of the Ricola Group or the interests of a successful collaboration.

## Compliance with regulations

We comply with all regulations that apply to our business activities. We do not tolerate any form of corruption or bribery or violations of competition law or data protection law.

**Compliance with regulations:** We comply with all regulations issued by legislators, authorities and other regulatory institutions, insofar as these regulations apply to our business activities. We also adhere to the Ricola Group's guidelines for our business activities.

**No active or passive bribery, no facilitation payments.** We do not tolerate any form of corruption or bribery. We do not bribe private individuals nor public officials and we do not take bribes. In addition, we do not pay for official actions by public officials to which the Ricola Group company in question is fundamentally entitled (known as "facilitation payments").

**Compliance with competition and antitrust law.** We are committed to fair competition and compliance with competition law and the rules and regulations contained therein. We do not tolerate any practices that are likely to restrict or prevent effective competition in a market or through which a company of the Ricola Group would abuse its dominant position in a market, or would abuse its dominant position in the market if such practices were exercised against it.

**Compliance with data protection law.** We respect the personal rights of our employees, business partners and other third parties we come into contact with. We are transparent when collecting and processing personal data and give the opportunity for rights to be exercised. We exclusively collect and process personal data in line with the applicable data protection law and only for specific and legitimate business purposes. We use state-of-the-art systems and secure personal data against unauthorized access.

## Sustainability and social responsibility

We are committed to sustainability in the context of economical and long-term resource management, and demand that our business partners take on social responsibility.

We respect human rights and have socially acceptable working conditions. We implement all legal, recognized and customary standards that apply at a place of work.

We do not work with companies that behave in an anti-social way and treat workers badly – particularly companies that approve of child labor, exploit the social and ecological corporate environment or support illegal, criminal or terrorist activities.

## Business partners

The Ricola Group expects its business partners to adhere to all applicable laws, regulations and guidelines as well as all contractual conditions, sustainability standards, quality standards and the Code of Conduct.

The Ricola Group only works with third parties who comply with legal requirements, pursue ethical business practices, follow the provisions of this Code of Conduct and observe standard requirements with respect to work, health, safety, environmental protection and management systems. In addition, the Ricola Group also expects its business partners to treat data, business secrets and information belonging to the Ricola Group with appropriate confidentiality and to take all measures to guarantee confidentiality and protect them against disclosure and misuse.

## REPORTING

We report potential misconduct immediately.

Anyone who becomes aware of conduct that may potentially violate the requirements of this Code of Conduct is required to report this to the appropriate point of contact. Reports of potential misconduct are treated in absolute confidence and should therefore not be submitted anonymously if possible.

For potential misconduct which potentially has to be classified as corruption or a violation of competition law, the report must exclusively be sent to Dr. Peter Mosimann, lawyer and consultant at the Wenger Plattner law firm in Basel, Switzerland (peter.mosimann@wenger-plattner.ch; +41 61 279 70 00).

Business partners can report any potentially non-compliant practices only to Dr. Peter Mosimann, lawyer and consultant at the Wenger Plattner law firm in Basel, Switzerland.

## CONSEQUENCES IN THE EVENT OF MISCONDUCT

The Ricola Group will not tolerate misconduct and this may result in disciplinary measures up to and including termination of the employment relationship.

The Code of Conduct is reviewed on a regular basis and amended if necessary. The current version can be found at [www.ricola.com](http://www.ricola.com).

The Code of Conduct was last amended on June 1, 2021.