

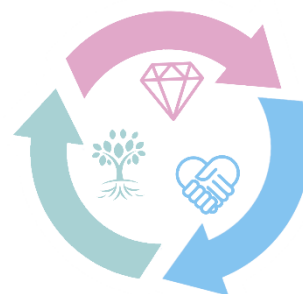


Code of Conduct

At Eisbär Eis, we stand for a high degree of reliability, both in our products and in our long-standing relationships with customers and suppliers. Responsible collaboration is always at the heart of what we do. Our Code of Conduct provides guidance for the day-to-day interactions of all employees, business partners and stakeholders. It forms the foundation of our commitment to sustainable practices throughout the value chain, reflects our values and commits us to maintaining high standards in every aspect of our activities. In line with the United Nations Sustainable Development Goals (SDGs), we follow internationally recognised standards to contribute to a sustainable future.

Our code of conduct is based on three fundamental components for collaboration:

- Corporate duty of care
- Ensuring human rights
- Being ecologically responsible



To improve readability, our Code of Conduct uses gender-neutral wording when referring to people. All genders are equally included without the use of specific male, female or non-binary designations.

The requirements set out in this Code of Conduct form the basis of our business relationships and represent minimum requirements. Our Code of Conduct is guided by internationally recognised guidelines, principles and scientific sustainability frameworks. Where legal requirements are stricter or more specific, they take precedence.

These include in particular:

- Core labour standards of the International Labour Organization (ILO)
- United Nations Guiding Principles on Business and Human Rights (UN Guiding Principles)
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct
- UN 2030 Agenda with its 17 Sustainable Development Goals (SDGs) and the Paris Agreement
- Kunming-Montreal Global Biodiversity Framework
- Minamata Convention
- Stockholm Convention

- Basel Convention
- Planetary Boundaries framework, as amended from time to time

1. Corporate duty of care



1.1 Compliance

Together with our business partners, we commit to complying with the regulations of this code of conduct, to applying it appropriately along the value chain, and to implementing it by means of suitable contractual regulations.

Any breaching of the obligations in this code of conduct authorises us to set a reasonable deadline for remedy, provided that the breach is not serious. Following unsuccessful expiry of this deadline, or in the case of a serious breach, we can withdraw from the contract or terminate it. In the event of withdrawal or termination, we shall not be obliged to provide compensation for damages incurred from the withdrawal or termination.

We and our business partners commit to reporting any breach of the specifications and to regularly reviewing and documenting compliance with them by means of appropriate measures.

1.2 General information

Together we commit to keeping documentation of the entire value chain up-to-date, and will make it available when needed. Transparency along the entire value chain represents the basis for fulfilling our corporate duty of care.

1.3 Management systems and process provision

To ensure full implementation of the code of conduct, all stakeholders are urged to implement a suitable risk management system that appropriately covers, analyses and prioritises the social and ecological impacts of their business activities as well as those of their suppliers.

In addition, all participants in the value chain must together provide the necessary personnel resources and management systems, and develop and continually monitor processes and guidelines to meet the requirements described in the code of conduct.

We and our business partners ensure that, in accordance with the applicable law (see the German Whistleblower Protection Law [Hinweisgeberschutzgesetz] or the EU Whistleblower Directive), an anonymous and easily accessible reporting system is set up for the reporting of deviations. All employees must be informed about the existence of the reporting system and must be able to use this without negative consequences.

Sozietät Esche Schumann Commichau Partnergesellschaft mbB, Hamburg, has been entrusted with taking care of internal reporting for Eisbär Eis:

Tel.: 040 368 05 119

Email: hinweisgeber-eisbaereis@esche.de

1.4 Inspections

Though trust is the basis for our business relationships, we have a corporate duty to review the corresponding systems operated by our business partners. Accordingly, we reserve the right to perform unannounced audits of our business partners at any time. The required information and disclosures shall be provided by our business partners as necessary for reviewing compliance with the specifications given in the code of conduct.

We may also commission a third party, obliged to confidentiality, to perform this review.

1.5 Corruption

The basis of our business relationship is ethically proper behaviour. Therefore, we require our business partners to act without bribery, corruption or any kind of fraudulent business practices and to take preventive actions in this regard.

1.6 Data protection

The protection of personal data as well as business-relevant information must be respected, and all applicable data protection law provisions as well as internal guidelines must be complied with.

1.7 Responsible sourcing and traceability

We and our business partners apply a risk-based approach to the sourcing of raw materials, ingredients, packaging and other materials. Origin, supply routes and material sustainability risks should be traceable to an appropriate extent.

Where increased risks are identified, appropriate preventive and remedial measures must be implemented. This applies in particular to risks relating to human rights, forced labour, deforestation and forest degradation, biodiversity loss, water stress, environmental pollution and greenhouse gas emissions. Applicable legal documentation, due diligence and information requirements must be complied with.

2 Ensuring human rights



2.1 Legal basis

Together we commit to complying with and safeguarding human rights in the company and within the value chain.

We commit to complying with international as well as national specifications and laws. This includes the respectively valid law in countries where we operate, industrial minimum standards, and all other relevant legal provisions.

2.2 Remuneration

The payment of all employees is compliant, as a minimum, with the legally prescribed minimum wage (in accordance with ILO Convention 131). Alternatively, where this would mean a higher standard, payment should satisfy the regional industrial standards or be determined through contract negotiations. Beyond this, the remuneration should be clearly defined and regularly notified to employees in an understandable format.

Payments must be made promptly and in full, via a lawful method of payment.

All employees have the right to statutory social security benefits, which we and our business partners pay with the benefits due in accordance with national law.

2.3 Working hours and work contracts

We and our business partners observe all applicable laws, specifications and industry standards concerning wages and working hours.

Employees do not work longer than the legally permissible working hours and observe the legally prescribed rest breaks and rest days.

Overtime working must be on a voluntary basis and regulated by a contract or collective agreements; it must also be separately remunerated in accordance with national law or offset by time off.

Employees must not be required to work more than 48 hours per week on a regular basis, and not more than 60 hours per week including overtime (ILO Convention 1).

In accordance with ILO Convention 14, there is a right to a day off after six consecutive working days.

All employees have the right to a written work contract in accordance with national law, which informs the employees about their rights, obligations and terms and conditions.

2.4 Discrimination and inhumane treatment

It is our shared responsibility to ensure that no employee is exposed to inhumane or demeaning treatment, physical punishment, sexual harassment, mental or physical duress, abuse or verbal mistreatment in the workplace.

Employees must not be exposed to any discrimination on the grounds of skin colour, gender (ILO Convention 100), age, religion, world view, social background, health, ethnicity, nationality, membership of employee organisations, sexual identity, political memberships or opinion. This applies in particular to recruitment, further training, promotion and wages of employees (ILO Convention 111).

It must be ensured that when using private security staff, there is no cruel, inhumane, or demeaning treatment, injury to life and limb, torture or restrictions on freedom of association or coalition.

2.5 Child labour

Child labour is prohibited, as set out in ILO Convention 182. It is important that we observe the national specifications as well as international standards on the protection of minors.

The minimum employment age is 15 years old and must not be below the age at which statutory compulsory school attendance ends (as per ILO Convention 138). Young workers must only be employed outside school hours, and it must be ensured that this does not restrict the young people's education. In particular, employees who are minors must not be exposed to any circumstances that could put their health and development at risk.

It is also necessary to strictly comply with the legal provisions relating to nighttime work in the employment of minors.

2.6 Enforced labour, slavery and disciplinary measures

Enforced labour is prohibited in accordance with ILO Conventions 29 and 105. A work role must be entered voluntarily.

All forms of slavery and practices similar to slavery are also banned.

Disciplinary measures may only take place within the framework of the national law, as well as of human rights, if they are detailed in the employment contract or in work specifications that have been made known.

2.7 Working conditions

All employees have the right to terminate their employment contract in compliance with the contractually agreed or statutory deadlines.

In addition, the employer is prohibited from retaining documentation, in particular employees' ID documents. The applicable worker protection obligations and nationally applicable labour law provisions must be fulfilled.

A system for identifying, assessing, avoiding and combatting potential hazards to health and safety must be in place.

Together we must ensure that conditions which are safe, clean and not harmful to health are guaranteed in the workplace and in any provided accommodation.

The provision and use of personal protective equipment, and access to sanitary facilities and clean drinking water must also be ensured. Regular information and training on worker protection and the legally stipulated standards on health protection must be ensured.

Employees must be granted the right to leave the company grounds in dangerous situations, without having to ask for permission.

An officer for staff health and safety must be determined on the Management Board, who is responsible for the introduction of and compliance with health and safety standards in the workplace (ILO Convention 155 and ILO Convention 187).

2.8 Freedom of association and collective negotiations

Each employee must be granted the right to form, join or support employee representation bodies. Employee representatives are permitted to engage in activities freely and within the law of the place of employment, and must not be exposed to any discrimination.

In countries in which free and democratic trade union activity is not permitted, employees must be given access to employee representatives (ILO Convention 87 and ILO Convention 98).

2.9 Grievance mechanisms, remediation and protection of affected persons

Grievance and whistleblowing systems should be accessible not only to employees but, where appropriate, also to business partners and potentially affected persons. Reports are handled confidentially, impartially and without disadvantage to the reporting person.

Where actual adverse impacts on human rights or the environment are identified, we and our business partners will contribute, within our respective areas of responsibility, to appropriate remediation and redress measures.

3 Being ecologically responsible



3.1 Resource use and environmental impact in general

We observe local, national, international and traditional land, water and resource rights. We must all also ensure that the environmental burden is kept as low as possible through the entire value chain.

3.2 Waste regulation

Together with our business partners, we strive to avoid waste. Suitable steps must be taken so that waste is handled, collected, transported and stored in an environmentally compliant way.

3.3 Hazardous materials and product safety

We and our partners are committed to strictly following laws and specifications for the handling of hazardous materials, chemicals and substances, whether in terms of handling, transport, storage, reuse, recycling or disposal.

In addition, we are compelled to observe the bans on the use of mercury as set out in the Minamata Convention.

3.4 Animal welfare

All applicable laws concerning the protection of animals and animal welfare must be complied with.

Suitable steps must be taken to adapt the husbandry and management systems for livestock to the needs of animals as best possible, and to meet the physiological needs of the respective species.

Avoidable pain should also be correspondingly avoided throughout the process.

3.5 Packaging

We and our business partners ensure that packaging is avoided where possible, or otherwise improved in terms of its environmental effects.

As such, reusable packaging, packaging that uses as little material as possible, recyclable packaging and packaging made of alternative materials should be considered.

3.6 Environmental protection

We jointly strictly comply with applicable national environmental protection laws. In addition, avoidance or reduction of environmental burden must be continually guaranteed. The preservation of bases for living must be ensured.

We try to avoid particularly harmful soil changes, groundwater pollution, air pollution, harmful noise emissions and excess water consumption.

3.7 Deforestation Regulation

Together we commit to engaging with the challenge of deforestation at global scale. Collaborative efforts are required to find sustainable solutions. The European Union is actively working on this by using a Deforestation Regulation to restrict trade involving products that potentially come from illegal clearing processes. Companies can take on an important role in this partnership-based dynamic by committing to promote sustainable procurement practices and supporting the protection of global forests. Through our shared commitment, we can bring about positive changes and shape a more sustainable future for our planet.

3.8 Climate protection

Within our joint responsibility, carbon reduction measures must be implemented in every phase of the value chain. It is our goal to actively contribute to reaching the 1.5-degree goal of the Paris Climate Agreement. To do so, we should particularly focus on avoidance and reduction strategies in accordance with the guidelines of the Science-Based Targets.

Climate protection should be considered in all aspects of our value chain. We encourage our business partners to also engage with the implementation of the 1.5-degree target under the Paris Climate Agreement. Through these shared efforts, we can make an important contribution to global climate protection and promote a more sustainable future for the coming generations.

3.9 United Nations Sustainable Development Goals

We recognise the United Nations 2030 Agenda and its 17 Sustainable Development Goals (SDGs) as an internationally recognised framework for sustainable development. We take the SDGs into account in our business decisions and expect our business partners, within their capabilities, to consider their relevant contributions and impacts.

For our value chain, the goals relating in particular to food and sustainable agriculture, water, energy, decent work, sustainable consumption and production, climate action, protection of marine and terrestrial ecosystems, strong institutions and partnerships are of particular importance.

3.10 Planetary Boundaries

We use the scientific concept of Planetary Boundaries as a framework for the long-term stability and resilience of our planet.

The Planetary Boundaries should be appropriately considered in the future direction and development of our business activities, particularly in relation to climate, biodiversity, land, water and environmental impacts.

3.11 Biodiversity, ecosystems and land use

We and our business partners should identify impacts on biodiversity and ecosystem services and prioritise actions in line with the mitigation hierarchy: Avoid, Minimise, Restore, Offset. Particularly sensitive, protected or ecologically valuable areas must be respected. For agricultural raw materials, we support sourcing and production practices that promote soil health, pollinators, biodiversity and long-term productivity while avoiding unnecessary conversion of natural ecosystems.

3.12 Water stewardship

Water-related impacts should increasingly be considered as part of our sustainability and risk assessments. This may include regional water availability, water quality and potential impacts on ecosystems and local communities.

As our activities continue to develop, opportunities for efficient water use and the prevention of contamination should be taken into account.

3.13 Circular economy, packaging and pollution prevention

We follow the waste hierarchy and prioritise prevention, reuse, recycling and high-quality recovery over disposal. Product and packaging design should reduce material use, waste, emissions and the use of substances of concern.

The requirements of applicable European and national packaging and waste legislation, including the EU Packaging and Packaging Waste Regulation (PPWR), must be taken into account and complied with insofar as they apply to the respective activity.

3.14 Environmental targets, data and continuous improvement

We and our business partners should define appropriate targets, metrics and improvement measures for material environmental impacts. Data should be traceable, robust and available to an appropriate extent upon request.

We support science-based and recognised approaches to assessing and managing climate, nature, water and biodiversity risks, and regularly develop our requirements in line with new scientific findings, legal requirements and recognised standards.

Shared understanding

At Eisbär Eis, we are proud to work with our business partners to foster a working environment based on integrity, respect and fairness. Compliance with our Code of Conduct is essential to the success of our company and to maintaining a positive corporate culture.

We look forward to continuing on this path together with you.

1 September 2026

A handwritten signature in blue ink, appearing to read "I. Schuldt".

Isabel Schuldt
Managing Director

A handwritten signature in blue ink, appearing to read "Christoph Ruchs".

Christoph Ruchs
Managing Director