



Policy statement on respect for human rights

Alfred Ritter GmbH & Co. KG is committed to responsible business practices. This policy statement defines our stance and requirements regarding human rights due diligence within the company and among our business partners along our value chain.

1. Our human rights strategy

Alfred Ritter GmbH & Co. KG is guided by the Sustainable Development Goals (SDGs) and supports the United Nations 2030 Agenda for Sustainable Development. As a minimum requirement, it is fully aligned with the following internationally recognised principles, declarations and conventions:

- United Nations (UN) Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights (UNGP)
- Core labour standards of the International Labour Organisation (ILO)
- International Labour Organisation (ILO) Declaration on Multinational Enterprises and Social Policy (MNE Declaration)
- United Nations Convention on the Rights of the Child (CRC)
- United Nations Convention on the Rights of Women (CEDAW)
- International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families (ICMW)
- Principles of the United Nations Global Compact (UNGC)
- Guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises

We expect our own employees and our business partners to respect human rights and environmental obligations in their business activities in accordance with the German Supply Chain Due Diligence Act (LkSG). If the laws of the countries of production conflict with international standards, it is our goal to work with our partners to develop solutions that uphold internationally recognised human rights and environmental standards.

The specific expectations of our business partners are set out in our Code of Conduct (www.ritter-sport.com/downloads).

This policy statement is reviewed regularly, at least once a year and as required, by the Human Rights Officer of Alfred Ritter GmbH & Co. KG and revised if necessary.

2. Our due diligence process for human rights and environmental protection

Our supply chain includes numerous actors, particularly in the regions where our raw materials are grown. Years ago, we developed due diligence processes for our most important raw materials and identify, analyse and assess actual and potential risks of our business activities within the supply chains. Based on this, we have developed various measures and strategies to reduce, avert or remedy potential human rights and environmental protection risks. These measures are evaluated on a regular basis.

Within our due diligence process, we prioritise both the magnitude of human rights and environmental risks and where we see the greatest opportunities for influence.

To implement these commitments, we work closely with certification organisations, local partners and NGOs. We value long-term partnerships with our suppliers and actively support them in complying with social and environmental standards.

2.1. Our risk analysis

With this declaration, Alfred Ritter GmbH & Co. KG undertakes to fulfil its human rights and environmental due diligence obligations with the aim of preventing or minimising human rights or environmental risks or ending violations of human rights or environmental obligations.

The risk analysis serves to identify and assess human rights and environmental risks both in our own business area, among our direct business partners, and, where substantiated knowledge is available, among indirect suppliers in our supply chain. We use the results of the risk analysis to regularly adjust our procurement strategy and code of conduct.

Abstract risk analysis

Our abstract risk analysis is carried out at least once a year and event related if required with the aid of due diligence software. In addition to internal sources, we also consider external sources (including industry-specific risks, country risks of a supplier with the aid of recognised indices, corporate structures and surveys of relevant stakeholders), which together form the abstract risk analysis.

Concrete risk analysis

In the second step, we carry out the concrete risk analysis based on the abstract risk analysis with the help of specific questionnaires. This allows us to validate, weight and prioritise the results of the previous abstract risk assessment.

Event-driven risk analysis

At the same time, we continuously analyse our environment (including through media screening) for possible human rights and environmental risks in the supply chain.

Before entering into any new business relationship with suppliers in the raw materials sector, we carry out a due diligence check. This review includes, among other things: a willingness to commit to our standards or equivalent standards for due diligence (including our Code of Conduct), an assessment

of country and industry risk, and a review of relevant documents (e.g. certifications) that can support compliance with human and environmental rights.

Results of our risk analysis

We identified the following human rights and environmental risks and areas for action:

Our own business area

With our local production and sales companies, we are also (partly) represented in high-risk countries. As part of the specific risk analysis, human rights and environmental risks were assessed as low overall. The following risks were prioritised: occupational health and safety and discrimination.

Direct and indirect business partners

The abstract analysis of the supply chain identified the following risks: illegal child labour, forced labour, harmful environmental changes, occupational health and safety, working hours, discrimination and inadequate/subsistence wages, particularly in the cultivation of important raw materials from Africa, Asia and Latin America. Vulnerable groups (including women and children) are also potentially affected here.

Following a concrete risk analysis of our business partners, we have identified an increased need for action in the areas of occupational health and safety and discrimination.

Based on studies conducted and the resulting substantiated knowledge among indirect suppliers, we have also identified the following risks: illegal child labour, forced labour and inadequate/subsistence wages. We comment on these issues in detail in our Cocoa Report (<https://www.ritter-sport.com/downloads>).

2.2. Our prevention and remediation measures

Our preventive measures are based on the results of our risk analysis and internal target systems for our prioritised raw materials. We regularly develop measures to prevent, mitigate and remedy the identified risks and to protect human rights and the environment.

For the prioritised topics of occupational health and safety and discrimination in our own business area, we focus on training, regular on-site audits related to sustainability and occupational safety as part of our holistic, externally certified management system standard, and the diverse activities of our occupational health management system.

In the area of the supply chain, we focus in particular on long-term partnerships with business partners and various other stakeholders.

We consider the procurement of 100 per cent certified cocoa (Rainforest Alliance Certified Cocoa and/or Fairtrade Standard for Cocoa), palm oil (RSPO) and standards for other raw materials such as milk and coffee to be fundamental.

Further information on this can also be found in our sustainability report (www.ritter-sport.com/sustainability) and, specifically for our cocoa sourcing, in our Ritter Sport Cocoa Policy Statement (www.ritter-sport.com/downloads).

In addition to this, we have supplemented our cocoa programmes with the aim of working with local partners to bring about positive changes in the social, ecological and economic conditions of cultivation through concrete measures and to ensure the long-term availability of high-quality raw materials. The programmes are individually tailored to the respective needs.

The current focus of the cocoa programmes includes eliminating illegal child labour, ensuring fair conditions for all parties involved in the supply chain, protecting forests and promoting agroforestry systems.

Through Child Labour Monitoring and Remediation Systems (CLMRS), we also protect children in cocoa-growing communities from the worst forms of child labour, raise awareness of this issue among cocoa farmers, families and the wider population through training, and work to improve the living conditions of households involved in cocoa farming. The system identifies children engaged in child labour through active, regular and repeated monitoring. Standardised data collection tools in the form of household and farm surveys are used to identify all children, cases of child labour or legal violations and to inform the households concerned. Remedial measures are then initiated and monitored.

Further information on this can be found in our Cocoa Report (www.ritter-sport.com/downloads).

Contractual provisions, our Code of Conduct for business partners, and regular risk-based and on-site audits along the supply chain complete our preventive measurements.

In addition, we engage in ongoing stakeholder dialogues and are active members of various associations, multi-stakeholder initiatives and working groups. We support industry solutions and the further development of sustainability standards, e.g. through our membership in the Technical Committee of the ZNU Standard Driving Sustainable Change.

2.3. Our grievance mechanism

We offer a complaints procedure that gives everyone in our own business area and people along the supply chain the opportunity to report violations or risks anonymously or confidentially.

Our goal is to identify potential grievances in our own business area and in the supply chain at an early stage and to take appropriate remedial action.

The complaints mechanism was established by Alfred Ritter GmbH & Co. KG on 1 January 2024, is constantly being developed and is available in 42 languages. All reports are treated as strictly confidential. Further information on the process, procedure, etc. can be found in our rules of procedure via the following link:

<https://prod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/complaints-portal/public-complaints/index.html#/ritter-sport/DEFAULT/complaint/new>

Those affected have the option of contacting us in the following ways, among others:

External and internal persons:

- Via the link: <https://prod.osapiens.cloud/portal/portal/webbundle/supplier-os-hub/complaints-portal/public-complaints/index.html#/ritter-sport/DEFAULT/complaint/new>
- "Complaint boxes" in accordance with Rainforest Alliance Certified Cocoa and/or Fairtrade Standard for Cocoa in our supply chain

Internal personnel only:

- Employees can also contact the Chief Compliance Officer at any time
- Notices posted at various locations within the company provide access to the complaint system via QR code, the complaint system is also accessible via the intranet

2.4. Documentation, reporting and responsibilities

The above measures are implemented and their effectiveness monitored, e.g. through KPI tracking and external impact assessments.

This not only serves to measure effectiveness but also ensures the continuous improvement of our risk management. Complaints, risk analysis and the measures derived from this are continuously documented and stored in accordance with legal requirements.

The management has appointed a human rights officer to monitor our risk management. At least once a year and as required, he reports to the management board on the above-mentioned topics. In addition, regular reports are made to the relevant internal departments for the continuous optimisation of our risk management system.

3. Our commitment

All company departments review and ensure that their actions and activities within their area of responsibility comply with the above principles. Any violations or breaches that occur are reported regardless of the area of responsibility.

Ultimate responsibility for compliance with human rights and environmental due diligence obligations lies with the company management.

Alfred Ritter GmbH & Co. KG will inform its stakeholders about this voluntary commitment and supports the principle of transparency.

Signature of the management board & the human rights officer

Andreas Ronken

Andreas Ronken
CEO

Asmus Wolff

Asmus Wolff
COO/CFO

Michael Lessmann

Michael Lessmann
CCO

Thomas Seeger

Thomas Seeger
Human Rights Officer