

HiPP BASIC PRINCIPLES

Status: 24.11.2023

Dear employees,

For generations, sustainable thinking and action, the careful use of resources and the environment, and respect for the dignity of people have characterized our corporate activities and our social responsibility.

Today as well as in the future, we continue to meet the high standards we have set ourselves, to manufacture top-quality products in harmony with nature, and to act responsibly - with a view to the company as a whole, but also with regard to each and every employee. In our dealings with each other as well as with our customers and business partners, we rely on trust, fairness, consistency, and integrity. Acting with integrity means doing the right thing. Our HiPP Basic Principles are intended to provide guidance in this respect.

Integrity and the pursuit of our corporate goals go hand in hand. Let us work together to firmly anchor the HiPP Basic Principles in our day-to-day work.

Thank you for your support!

HiPP PPRINCIPLES

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1. Understanding and objectives of compliance at HiPP

1.1 Understanding

Compliance is the fulfillment of requirements. It ensures legal conformity, compliance with the law and adherence to internal regulations.

Compliance includes all measures taken to ensure that business is conducted in accordance with the law and regulations. At best, they prevent violations, but at least they make them considerably more difficult and consistently uncover them.

The measures are divided into

- Rules and guidelines that specify the legal and internal requirements,
- Training and other further training to create awareness of the problem,
- audits to check compliance and
- advice in individual cases.

Rules and guidelines are regularly reviewed and updated.

Training courses and audits are carried out according to risk-based guidelines.

The addressees of the compliance measures are the companies of the HiPP Group, all employees and all direct and indirect business partners.

1.2 Compliance objectives

The main objective of compliance is to **avoid organizational fault** with regard to a company's catalog of obligations.

Organizational culpability, which is typically based on omissions on the part of the company, has been specified in a large number of court rulings and is set out in its essence in **ISO 37301 Compliance management systems - Requirements with guidance for use**.

According to **ISO 37301**, the objectives linked to the avoidance of organizational fault are:

- Risk minimization** through risk management - assessment and action
- Increasing efficiency** through central administration, fast data access and optimization of processes

C. **Increasing effectiveness** by automating control mechanisms - thanks to legally compliant data, well-founded and transparent decisions can be made.

2. Our responsibility in the workplace

2.1 Compliance with rules and dealings with each other

We comply with applicable laws and regulations, internal policies, and this Basic Principles.

At HiPP,¹ we treat each other fairly and in a spirit of trust and show mutual respect.

2.2 Our responsibility as manager

As managers, we promote our employees' ability to act and delegate responsibility to them wherever possible, thereby promoting entrepreneurial thinking and action at all levels.

2.3 Occupational health and safety

The health, safety, and well-being of our employees² are a priority at HiPP.

We comply with all applicable occupational health and safety obligations to prevent any risks to the health of our employees. We ensure this by observing safety standards in the provision and maintenance of the workplace, workstation, and work equipment. We provide appropriate protective measures and take care of the education and training of our employees.

2.4 Working conditions

We ensure good and attractive working conditions for all employees at HiPP.

We comply with applicable labor laws and regulations, including requirements for wages, working hours and other benefits.

The reconciliation of family and work life is of particular concern to us.

2.5 Data protection and privacy

We protect the personal data of employees, former employees, customers, business partners and other third parties.

¹ Whenever this Ethics Charter refers to HiPP, it means all group companies of the HiPP Group.

² The term 'employees' also includes managers at all levels and members of executive bodies of the HiPP Group.

We collect, collect, process, use and store personal data responsibly and only in accordance with legal requirements. We protect personal data from loss, alteration and unauthorized use and ensure the security of our information technology and electronic data processing facilities.

We respect the privacy of everyone.

2.6 Protection of Trade Secrets

We promote innovations that consistently delight our customers and consumers.

We protect the trade secrets and technical know-how underlying these innovations.

We respect the intellectual property of competitors, business partners and other third parties.

2.7 Sustainability and use of resources

Our actions are geared towards sustainability. We use resources carefully and sustainably.

Sustainability determines our entrepreneurial thinking and actions. Therefore, we make sure to harmonize ecological, social, and economic aspects in the best possible way.

We use company resources only for HiPP's operational purposes.

Further details will be defined in sustainability guidelines.

3. Our responsibility as a business partner

3.1 Prohibition of corruption

We reject any form of corruption and bribery.

HiPP stands for fair competition in which only market-based criteria, especially quality and innovation, are decisive for business decisions.

We grant benefits to customers, business partners or other third parties exclusively within the legally permissible framework and defined guidelines. We do not tolerate any corrupt behavior on the part of our employees, customers, or business partners.

3.2 Dealing with officials and holders of political office

When dealing with officials and holders of political office, HiPP avoids even the appearance of inappropriate influence.

We recognize that officials and holders of political office often have their own strict internal rules for accepting benefits from the private sector. We respect and abide by these rules, even when such gratuities are expected or supposedly customary for public transactions. We also do not use third parties to improperly influence officials and holders of political office.

3.3 Conflicts of interest

We make business decisions only in the best interest of HiPP.

When making business decisions, we do not allow ourselves to be influenced by personal or financial interests, including but not limited to interests resulting from a secondary deployment, benefits for family members or the promotion of voluntary or political activities.

3.4 Competition

HiPP is fully committed to a functioning and unhindered competition as one of the cornerstones of our social and economic system.

We do not participate in any illegal exchange of competitively sensitive information or in any agreements with competitors, customers or business partners that restrict competition, e.g. price fixings, division of markets or customers. Furthermore, we do not participate in the abuse of a possible dominant market position.

3.5 Export Control

We ensure compliance with all regulations governing the import and export of goods, services, and information.

We avoid any business relations with persons, organizations, and countries that are subject to sanctions or embargoes.

3.6 Prohibition of money laundering and terrorism financing

We comply with all laws against money laundering and terrorism financing.

We check the identity and economic background of our business partners. We verify the origin of payments to ensure that they come from legitimate sources.

3.7 Insider information

We treat confidential information from our customers or business partners as strictly confidential.

We process such information only internally and do not share it with others, such as family members and friends, or induce them to use this information.

4. Our responsibility as member of society

4.1 Respect for human rights

For HiPP, respect for human rights is a fundamental principle of human coexistence.

We uphold and respect the "Guiding Principles on Business and Human Rights" endorsed by the UN Human Rights Council.

We are committed to preventing, minimizing, and ending negative human rights impacts within our own business operations wherever possible. We work to ensure that our business partners, in particular our direct suppliers, also respect human rights and take appropriate measures.

4.2 Equal opportunity and equal treatment

HiPP promotes respectful and cooperative interaction, diversity and tolerance.

We do not discriminate or tolerate discrimination based on national or ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion, belief, or any other characteristic protected by law.

We ensure equal employment opportunities and compliance with equal pay for equal work. We live diversity and are committed to inclusion.

4.3 Product quality and safety

Product quality and safety have top priority at HiPP.

Therefore, we are committed to complying with the highest standards of food safety in accordance with all applicable laws and regulations, and further ensure this through uncompromising quality testing at a high technical level. We continuously and systematically develop innovative products and packaging by using scientific research and state-of-the-art technology.

4.4 Protection of the environment

Treating nature and natural resources with respect is our declared corporate goal. In our entrepreneurial activities, we focus on production according to the guidelines of organic farming and the promotion of ecological sustainability.

We protect the environment. We do this by relying on environmentally friendly, advanced, and efficient technologies. We promote the environmental awareness and behavior of our employees through dialogue, information, and various offerings. We actively promote environmental protection to keep the world livable and lovable for future generations.

4.5 Representing HiPP

We coordinate external statements with the Communications Department.

When stating our opinions in public or on social media where we can be recognized as HiPP employees, we make it clear when we are expressing our personal views.

4.6 Our responsibility to society

We support the society. We make our contribution by working with charitable organizations. We support the social volunteer activities of our employees in their area and thereby contribute to the common good.

5. Our responsibility for compliance with this HiPP Basic Principles

5.1 Scope

All HiPP employees are required to know the content of this HiPP Basic Principles and act accordingly.

5.2 Responsibilities of managers

HiPP expects managers at all levels to fulfill their role model function by acting with integrity and, thereby giving guidance to their employees in complying with this HiPP Basic Principles. They promote a culture of respectful and rule-based interaction.

5.3 Reporting violations

If we suspect a violation of the HiPP Basic Principles or another HiPP rule, or illegal/unethical behavior, we can report it to our supervisor or to the Compliance Department. We also have access to the online reporting system at <https://hipp.secureveal.com/>, which allows us to report openly or anonymously. All reports are treated confidentially.

5.4 Protection of whistleblowers and persons concerned

Hipp does not tolerate discrimination, intimidation, or retaliation against whistleblowers. Such behavior constitutes a serious breach of duties under the employment contract, which may also lead to disciplinary measures. The same applies if a whistleblower makes a report in bad faith. This is the case when the whistleblower had no factual indications that the reported information was correct at the time of the report. At the same time, the whistleblower system protects the interests of persons concerned by a report. The presumption of innocence applies as long as the accusation has not been confirmed.

5.5 Internal investigations

HiPP takes all reports of violations of the HiPP Basic Principles seriously and conducts internal investigations in an objective, neutral and confidential manner. At the conclusion of an investigation, HiPP will take appropriate consequences, including disciplinary measures, if necessary.