



Code of Conduct

EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen



Code of Conduct

EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen

Table of contents

A) PRICIPLES	4
B) RESPECT	4
a) Dealing with employees and third parties	4
b) Labor standards	5
c) Safety at work	5
C) INTEGRITY	6
a) Bribery and corruption	6
b) Representation of EDEKA in public	6
D) LOYALTY	7
E) FAIR AND FREE COMPETITION	8
a) Compliance with legal requirements and internal guidelines	8
b) Competition	8
F) ENVIRONMENT PROTECTION	9
G) PROTECTION OF INFORMATION	10
a) Trade and business secrets	10
b) Data protection	10
H) CONSUMER PROTECTION	11
I) IMPLEMENTATION OF THE GUIDELINE FOR COMPLIANT BEHAVIOR	11



Transparency creates trust and trust is the basis for good cooperation.

Preamble

As the largest food retailer in the region of Northern Bavaria, Saxony and Thuringia, the EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen has the will, the obligation and the responsibility to act in accordance with the valid laws. This is only achievable if every employee guarantees the highest level of integrity. Respect, the protection of free and fair competition, loyalty, environmental and data protection are the fundamental principles of our business activities. That is why we are obliged in our daily work and beyond to comply with the valid laws, applicable regulations and internal guidelines.

This code of conduct summarises the essential principles and rules for our actions. It represents what we expect from ourselves and describes the behavior that we have to adhere to in our daily dealings among each other, with our independent merchants, our customers and our business partners.

We set ourselves the goal anchored in Article 1 of the Cooperative's Articles of Association to support and maintain the members of the Cooperative and their businesses in the long term. Our incentive is the power and passion of the EDEKA brand.

The EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen expects all employees, business partners and suppliers to behave in accordance with the rules. taking into account the requirements of our guideline for compliant behavior and encouraging colleagues and third parties to comply with these requirements.


Christian Remy


Sebastian Kohrmann


Gert Lehmann

NOTICE: The EDEKA Nordbayern-Sachsen-Thüringen eG and its subsidiaries, in which a direct or indirect participation of more than 50% is held, are managed under the EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen.





A) PRINCIPLES

Within the EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen, our actions are based on the cornerstones of fairness, mutual respect, integrity, and legal compliance. We observe the international recognised human rights and labor standards.

Standing in the long-standing tradition of the EDEKA cooperative, we act in the spirit of honest merchants, thinking long-term, clearly and transparently. We treat each other appreciatively, respectfully and honestly, based on a positive and optimistic attitude. We demand that our managers treat their employees in a reliable, demanding and supportive manner.

B) RESPECT

a) Dealing with employees and third parties

All employees of the EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen live the basic idea of Article 1 of the German constitution (Basic Law) through their behavior. We call for the protection of human dignity and human rights, as specifically¹ set out in the United Nations (UN) Universal Declaration of Human Rights² and addressed in the United Nations Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.³ All employees must observe and respect this at all times.

Behavior that leads to colleagues, business partners or customers being insulted, humiliated or embarrassed is prohibited at EDEKA. Furthermore, unequal treatment based on skin color, ethnic origin, gender, age or sexual orientation, religion or belief, illness or disability is expressly rejected. Any form of bullying – defamation, spreading rumours, threats, verbal abuse or harassment – is unacceptable. However, deliberately defamatory or undignified treatment or the intentional withholding of work-related information is also rejected. Any form of sexual harassment in the workplace will not be tolerated. In all our business activities, we always strive to neither cause nor contribute to human rights violations.

¹ Universal Declaration of Human Rights

² Guiding Principles on Business and Human Rights – UN Guiding Principles on Business and Human Rights

³ OECD Guidelines for Multinational Enterprises – OECD Guidelines for Multinational Enterprises

b) Labor standards⁴

EDEKA is committed to fair working conditions and protects the rights of employees. In particular, the focus is on the health and safety of employees.

We do not tolerate child labor and respect the applicable legal minimum age for eligibility for employment. In any case, we do not employ anyone under the age at which compulsory schooling ends according to the law of the place of employment, or under the age of 15. In the case of persons under the age of 18, the rights of young employees must be observed; they may only be hired if it is ensured that the working and employment conditions do not pose a risk to their health, safety or morals, nor are they harmful to their development.

We reject any form of forced or compulsory labor that is incompatible with internationally recognized labor and social standards.

When paying for work, we comply with the statutory provisions or – where applicable – collective bargaining agreements. We ensure that the wages we pay are not less than the applicable statutory or applicable collective bargaining or industry minimum wage. We do not tolerate deductions from wages that are not permitted by law, including deductions from wages as a disciplinary measure. In addition, we take into account the principle of equal pay for work of equal value, regardless of the gender of the workforce.

We comply with the legal or applicable collective bargaining agreement regarding working hours, including overtime, rest breaks and vacation time.

c) Safety at work⁵

We observe national and international occupational health and safety standards and ensure a safe working environment in order to maintain the safety and health of our employees, protect third parties and prevent accidents, injuries and work-related illnesses. We ensure that our employees are trained in all relevant occupational health and safety issues and expect that all employees regularly complete the training courses assigned to them.

4 Content based on: ILO Conventions Nos. 26, 29, 100, 105, 111, 131, 138, 159, 164, 165, 182
5 ILO Conventions Nos. 155, 183 and 184; ILO Recommendation No. 164





C) INTEGRITY

a) Bribery and corruption⁶

Every employee is prohibited from directly or indirectly accepting, demanding or being promised money or other benefits from third parties that serve to give customers, business contacts or third parties undue preference.

Conversely, all employees are also prohibited from offering, promising or granting a benefit to third parties that aims to improperly favor a company, an employee or any other third party.

Cooperation with business contacts and customers is based exclusively on objective criteria. In the case of gifts and invitations, care must be taken to ensure that there is no susceptibility to influence. Invitations may only be accepted or given within the limits of normal business hospitality and if it cannot be construed as improper influence. We act in accordance with applicable import and export control regulations and comply with legal requirements to prevent money laundering.

We also exercise extreme restraint in our relationships with officials. The term official is to be interpreted broadly and also includes civil servants and employees of authorities, public bodies, state-owned companies and international organizations through to MPs and candidates, representatives and employees of political parties.

When assessing whether one of the above procedures is permissible, the view of an objective, critical third party must be assumed. In case of any doubt, the Compliance Manager should be consulted.

b) Representation of EDEKA in public

Any communication with the media and press releases takes place exclusively via the press office, located in the board area, in coordination with the executive board.

Sharing operational information on social media, such as B. Facebook, Twitter, Instagram or other social networks is not permitted. We refrain from any discrediting statements about the EDEKA companies, customers, employees or products are forbidden. We mark all relevant statements as the personal view of the person publishing.

All announcements in social media that allow a connection to the EDEKA companies must be objective and coordinated with the executive board.

⁶ United Nations Convention against corruption



D) LOYALTY

We expect appropriate loyalty towards the EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen from all employees. Potential or possible conflicts of interest should be addressed to the manager or the compliance manager to avoid problems or to find solutions. Every employee is obliged to separate all private and business interests and to make decisions impartially and in the interests of the company.

No private business relationships may be entered into with business contacts or competitors if this leads to a professional conflict of interest. Insofar as spouses/partners, other family members or third parties or acquaintances living in the same household are involved in decisions, special sensitivity must be shown. The manager must be informed in all cases so that in the event of a conflict the decision can be taken by them.

Secondary employment requires the approval of management and must be reported to the employer in writing. These must not impair the productivity and effectiveness of the employee in relation to their work at EDEKA.





E) FAIR AND FREE COMPETITION

a) Compliance with legal requirements and internal guidelines

Every employee is obliged to comply with national and international laws and regulations as well as internal guidelines. The guidelines are binding for all employees. A deviation from the guidelines, even in special or particular cases, is strictly prohibited. Exceptions require the prior approval of the management.

to inform employees as early as possible of new legal regulations so that changes can be implemented in business processes and compliance with them can be guaranteed. In cases of doubt, the compliance manager must be consulted.

b) Competition

Fair and free competition are the prerequisites for efficiency, innovation and variety of choice for customers and consumers. The EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen is committed to these requirements of the social market economy and adheres to the laws protecting competition.

We do not tolerate anti-competitive collusion and ensure that we act in accordance with applicable anti-trust laws. We reject competitive advantages through unfair business practices. This applies in particular to the coordination of pricing and market sharing, but also to theft, spying and other illegal methods of obtaining information that aim to illegally influence free and fair competition.

If an employee becomes aware of efforts regarding such agreements, they must be reported to the compliance manager immediately.



F) ENVIRONMENT PROTECTION

The protection and preservation of the natural basis of life affects and obliges us all. With this awareness, we carry out our business activities taking into account ecological aspects and are committed to the goal of a climate-neutral future.

In cooperation with regional, national and international organizations, EDEKA is committed to sustainable action both now and in the future. The focus is on promoting sustainable product ranges, acting in an environmentally and climate-conscious manner, as well as taking on responsibility and commitment to a sustainable society. In order to be able to guarantee this, EDEKA is committed to biodiversity and resource protection, especially for water and the climate.

Since 2009, EDEKA, together with the environmental protection organization WWF, has been campaigning for more environmental protection in the range and in the entire supply chain.

In addition, the EDEKA association is a founding member of the Initiative Tierwohl (Animal Welfare Initiative) and is committed to better housing conditions for pigs and poultry. Together with the agricultural and meat industries, EDEKA campaigns for improved farming conditions and promotes animal welfare measures that go beyond state standards.





G) PROTECTION OF INFORMATION

a) Trade and business secrets

Operating and business secrets are subject to absolute secrecy, both during and after the end of the employment relationship. This also applies to information entrusted to you by third parties in the course of your work. Conversely, our supplying companies and other business contacts are also contractually bound to secrecy.

Confidential information of any kind may neither be used to pursue your own interests nor made accessible to third parties. The secure storage of company information must be always ensured.

Employees should only have access to the information they need for their work. It is forbidden to pass on access data to employees or third parties who do not need them for their business activities.

b) Data protection

The EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen respects the privacy of employees, independent retailers, customers and business partners. Therefore, personal or person-related data is only collected, stored or processed for specified purposes if the data subject has given his or her consent and this is legally permissible.

The highest standards are observed in data processing. The right to information, objection, blocking and deletion in the data protection area are always taken into account.

The person responsible for data protection ensures compliance with the data protection regulations through suitable organizational and technical measures. In addition, employees must observe the data protection regulations relevant to their area of activity with the necessary care.



H) CONSUMER PROTECTION

The protection of consumers is given high priority. For this reason, we have established extensive measures to check compliance with our own high quality standards. Regular checks carried out at the suppliers and in the production facilities ensure that the statutory consumer protection requirements are complied with.

As part of information and sales measures, we take the interests of consumers into account by using fair business, marketing and advertising practices. We pay particular attention to the interests of children, senior citizens, people with disabilities and other vulnerable groups.

I) IMPLEMENTATION OF THE GUIDELINE FOR COMPLIANT BEHAVIOR

Without exception, all employees must comply with legal requirements, this guideline and other regulations relevant to them. Managers have a special role model function. Anyone who violates the rules in their official work for the EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen must expect sanctions under labor law, depending on the type of violation.

The EDEKA Unternehmensgruppe Nordbayern-Sachsen-Thüringen has set up a whistleblower system to ensure a uniform, professional and transparent approach to handling reports of violations of applicable laws, discrimination or other irregular behavior. The whistleblower system is available to both employees and external parties, such as self-employed merchants, supplying companies or business contacts.

All information is treated confidentially, the protection of the whistleblower is guaranteed.

Employees and third parties can confidentially and anonymously contact the compliance manager or use the whistleblower platform.

If you have any questions in connection with the application and implementation of this guideline or questions about the compliance program, the compliance manager or the chief compliance officer will be happy to answer any questions you may have.





Contact:
WUE-Compliance-NST@edeka.de

