

LOBBYING POLICY

1. Purpose and Scope

This policy regulates the principles and procedures for lobbying activities of the Ricola Group, an international manufacturer of functional confectionery headquartered in Switzerland. It applies to all employees, managers and external representatives who communicate with political, regulatory or social actors on behalf of the company.

2. Principles

- *Transparency:* All lobbying activities are carried out openly, comprehensibly and in line with the expectations of the public.
- *Integrity:* We represent our interests honestly, fact-based and in compliance with all applicable laws and industry standards.
- *Responsibility:* As a food manufacturer, we have a special responsibility towards consumers, especially with regard to health, sustainability and children's advertising.
- *Compliance and anti-corruption:* All activities comply with legal requirements in Switzerland, the EU and other export markets. The Ricola Group has a zero-tolerance policy towards corruption and bribery. All lobbying activities are carried out in accordance with our compliance guidelines.
- *Social contribution:* In all lobbying activities of the Ricola Group, care is taken to make a positive contribution to society and/or the environment.
- *Political contributions:* As a matter of principle, the Ricola Group does not make any financial or factual contributions to political parties, candidates or public officials.

3. Goals of lobbying

- Promotion of fair and practicable regulations in the areas of food labelling, sugar reduction, packaging and sustainability as well as advertising/communication regulations.
- Influencing international trade agreements, tariffs and export conditions for our products.
- Co-creation of standards and norms (e.g. Codex Alimentarius, EU regulations).
- Protecting the innovative capacity and competitiveness of the Swiss confectionery industry.
- Promoting voluntary industry initiatives for health promotion and environmental responsibility.

4. Responsibilities

- *Management:* Approval of strategic lobbying goals and partnerships.

- *Corporate Affairs / Regulatory Affairs / Corporate Communications:*
Implementation, coordination and documentation of all lobbying activities.
- *Product development / marketing:*
Cooperation with Regulatory Affairs on regulatory issues (e.g. claims, packaging, advertising).
- *External Partners:*
May only operate with written agreement and in compliance with this policy.

5. Approach

- Participation in industry committees (e.g. Biscosuisse, Fial, Promarca, SG Sweets Global Network) and local working groups (e.g. industry association, location promotion) is desired, provided that it is transparent.
- Contacts with authorities (local, national, international) must be documented.
- Statements on draft laws are coordinated and fact-based.

6. Conflicts of interest

All potential conflicts of interest must be disclosed immediately. Employees are not allowed to derive personal benefits from lobbying activities.

7. Reporting and control

- An annual report on lobbying activities is prepared to the Group Executive Board (GM) as part of the Sustainability Report.
- Violations and risks in connection with lobbying activities are identified, assessed and monitored as part of our compliance and risk management system.
- Compliance with this policy is regularly checked by internal audits. Stakeholders can report concerns about our lobbying practices through our whistleblowing system ([link](#)).

8. Entry into force and revision

This policy comes into force with immediate effect and is reviewed at least every two years as part of the lobbying report and adjusted as necessary.

It is publicly available on the company website and can be viewed by all stakeholders.