



LINDT & SPRÜNGLI

Human Rights Policy

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Valid for: Lindt & Sprüngli Group | Contact: media@lindt.com





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Human Rights Policy

Preamble

Conducting business in an ethical, legal, and environmentally and socially responsible manner is an integral part of Lindt & Sprüngli's Guiding Principles. Similarly, Lindt & Sprüngli is committed to a strong corporate culture that includes qualities such as honesty, respect, and doing business with integrity. We cannot realize this commitment and contribute to a sustainable tomorrow without acting with respect for human rights in every aspect of our business.

Scope of Our Commitment

This Policy articulates Lindt & Sprüngli's commitment to respecting human rights. This entails implementing a due diligence process aimed at preventing, mitigating, or ceasing adverse human rights and environmental impacts throughout the organization and our supply chain.

Our human rights commitment is guided by the following international conventions and standards:

- United Nations Guiding Principles on Business and Human Rights (UNGPs);
- International Bill of Human Rights¹;
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work and core International Labour Standards;
- Organisation for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises; and
- UN Global Compact.

This Policy applies to our global operations, including our subsidiaries. We expect our employees, including part-time and temporary workers and independent contractors, to respect human rights in a manner that is consistent with this Policy. As human rights issues are systemic, we also must rely on the concerted, continued and honest efforts of all stakeholders. We expect our suppliers to comply with our Supplier Code of Conduct, applicable local laws and regulations, to uphold the commitments in this Policy, and adopt and adhere to similar policies and practices within their own operations.

Due Diligence

We are committed to conducting ongoing human rights due diligence. Our approach is guided by the UNGPs, including meaningful engagement with internal and external stakeholders, and due consideration of those parties and/or persons potentially and actually affected and/or their legitimate representatives.

Accordingly, we operate an appropriate risk management system which seeks to identify, assess, and mitigate actual and potential risks in our operations and supply chain. If risks are identified, we commit to taking preventive measures. We will annually review our due diligence process and salient risks, monitor and assess

¹ Including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the International Covenant on Civil and Political Rights



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the effectiveness of our actions, and publicly report on our efforts. In accordance with our learnings, we aim to continually enhance our risk-based due diligence processes, including supply chain assessments and prevention measures. This includes reviewing this Policy on a regular basis and introducing revisions where necessary or appropriate. The most recent version of this Policy is publicly available at: <https://www.lindt-spruengli.com/sustainability/governance-documents>.

Our Focus and Salient Issues

There are human rights issues that are particularly relevant to our business, industry and supply chains. This understanding was based on a saliency assessment and engagement with internal and expert external stakeholders. Among the broader human rights issues that we identified, we prioritize the following (in alphabetical order):

- Access to Water and Sanitation
- Biosphere Loss / Deforestation
- Child Labor
- Climate Change
- Discrimination, Harassment and Violence
- Forced Labor
- Health and Safety
- Land Rights
- Living Income and Wages
- Working Hours

Integration and Implementation

Our actions to respect human rights and address our salient issues are integrated into our business on an ongoing basis, including through the following Lindt & Sprüngli policies, programs and processes²:

- [Lindt & Sprüngli Sustainability Plan](#)
- [Business Code of Conduct](#)
- [Supplier Code of Conduct and Compliance Declaration](#)
- [Speak Up Policy](#)
- [Responsible Marketing Policy](#)
- [Health & Safety Policy](#)
- [Environmental Policy](#)
- [Community Child Protection System Guidance Document for Suppliers](#)

To share our commitment to human rights, we will communicate this Policy to our employees, who also receive the Business Code of Conduct, and to our suppliers. We will also periodically train and educate relevant employees and continue to work with suppliers to emphasize and promote our expectations.

² [Sustainability Governance Documents | Lindt & Sprüngli \(lindt-spruengli.com\)](#)



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Remedy & Grievance Mechanisms

We encourage raising any concerns and reporting any activities which are not consistent with Lindt & Sprüngli's policies or are unlawful. Our grievance mechanisms include the Lindt & Sprüngli Speak Up Line, which is operated by an independent third party. It includes provisions for safe engagement, confidentiality, anonymity (where legally permitted), and raising concerns in multiple languages. The process for follow up and investigation is explained in our Speak Up Policy.

Lindt & Sprüngli will not tolerate retaliation against anyone who communicates, reports, or cooperates in the investigation of concerns. Any retaliation by employees and managers of Lindt & Sprüngli will be subject to disciplinary measures. We expect our suppliers to adopt similar measures.

Where we identify that we have caused or contributed to adverse impacts, we commit to providing for or cooperating in remediation for affected individuals or groups.

Governance

The Lindt & Sprüngli Human Rights Working Group (HRWG) is a cross-functional sub-committee of the Sustainability Executive Team. It is chaired by the Human Rights Officer and composed of the heads of Group Sustainability, Global Procurement, Group Human Resources, Global Environmental Health & Safety, and Group Legal Affairs. Together, the working group shall be responsible for guiding the company's human rights due diligence strategy, driving its implementation and supporting efforts to embed it throughout the organization and our supply chain. The HRWG shall meet quarterly to maintain the strategy, oversee performance, and review and guide appropriate action in response to human rights risks. The CFO, in its capacity as the Group Management member responsible for sustainability, shall provide executive oversight and liaise with the CEO and other members of Group Management. Ultimate oversight for human rights resides with our Board of Directors, represented by the Corporate Sustainability Committee. Group Management and the Board of Directors shall be briefed at least annually.

Dr. Dieter R. Weisskopf
CEO, Lindt & Sprüngli

Approved by the CEO, Group Management and the Board of Directors, June 2022

While local language translations may be made, the original English version will remain the only official version.