

Hesburger

CODE OF CONDUCT

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Hesburger code of conduct

This Code of Conduct outlines the ethical principles and standards that guide our operations at Hesburger. It applies to our employees, management, subcontractors and suppliers. Through shared code of conduct, we ensure that everyone acts in a consistent manner, and it helps us make the right decisions in our work.

The Code of Conduct has been approved by Hesburger’s Management Team.



★ 1. CORE VALUES AND PRINCIPLES

As a company, we are committed to promoting responsible and sustainable business practices. We operate honestly, respectfully, responsibly and follow a customer-oriented approach in all our dealings. These values are supported by our commitment to comply with all relevant and applicable international agreements, EU legislation as well as national laws and regulations. In our operations, we pay particular attention to environmental sustainability, social responsibility and good governance.

We conduct our business professionally and in accordance with the company's values. Colleagues and stakeholders must be treated with respect and equality regardless of their position or background. We are committed to non-discrimination and will take action against all forms of discrimination and harassment whenever they are observed. Everyone is expected to carry out their duties diligently and responsibly, contributing to a safe and healthy workplace.



★ 2. ENVIRONMENTAL RESPONSIBILITY

We are committed to the principles of environmental responsibility, which include proper sustainability reporting, combating climate change, maintaining air, soil and water quality and promoting circular economy. We are committed to reducing our environmental impact by adopting sustainable practices and complying with all environmental laws and regulations applicable to our operations.

We actively maintain measures to prevent pollution of air, soil and water. We prefer environmentally friendly technologies in our products, handle chemicals with care and use appropriate water treatment and purification systems.



2.1 Climate goals and climate change mitigation

We actively strive to mitigate climate change and develop our operations to be more sustainable. Our goal is to reduce the climate impact of our operations and value chain in the long term.

We develop and monitor our climate goals in accordance with best practices in our industry and following regulatory standards. We also ensure that we make progress towards our climate goals and that they align with internationally and scientifically verified climate objectives.

We also require climate responsibility from our partners. We work only with suppliers and partners who share Hesburger's commitment to mitigating climate change.

2.2 Sustainability reporting

Through sustainability reporting, we promote transparency in our business operations, manage our environmental and social impacts and fulfil modern regulatory requirements. Responsible reporting is a critical part of achieving sustainable development goals. With proper reporting, we ensure that all our stakeholders receive open and transparent information about our operations.

2.3 Circular economy

We aim to minimise waste generation and utilise the materials we use as efficiently and for as long as possible. We seek to reduce emissions and energy consumption and continuously look for new sustainable solutions for waste management. Our goal is to reduce the use of plastic and develop our packaging materials to be more ecological. We collect, sort and recycle waste appropriately, complying as a minimum with the requirements set by local authorities. In addition, we actively continue to develop our operations to reduce food waste.

★ 3. SOCIAL RESPONSIBILITY

We are committed to promoting the social responsibility of our business across all areas of our operations. We ensure fair working conditions, equal treatment, consumer safety and good business practices.



3.1 Human rights

We are committed to respecting internationally recognised human rights in our own operations and throughout our supply chain. Our operations are based on the United Nations Guiding Principles on Business and Human Rights (UNGP), the OECD Guidelines for Multinational Enterprises and the core labour rights defined by the ILO.

We regularly identify and assess human rights risks and impacts. We take preventive and remedial action if we identify adverse impacts. We require our suppliers of goods and services to demonstrate a similar commitment to respecting human rights and monitor this as part of compliance with our corporate responsibility requirements.

3.2 Fair working conditions, occupational safety and equal treatment

Our employees have the right to freedom of association and to a healthy and safe workplace. We comply with the collective agreements in force at any given time (if any) and respect our employees' right to freedom of association and collective bargaining. We respect all fundamental labour rights, such as the right to organise, the prohibition of forced labour, the prohibition of child labour, and the prohibition of discrimination.

We are committed to creating a safe working environment that supports physical and mental well-being. We have preventive measures in place to reduce occupational accidents and diseases. We maintain a strong safety culture with up-to-date instructions, safety inductions and active occupational health and safety activities. We apply a zero-tolerance policy regarding intoxicants, and working under the influence of intoxicants is strictly prohibited.

We are a diverse and multicultural workplace where we treat each other equally. We do not, without an objectively acceptable justification, treat anyone differently on the grounds of gender, age, origin, language, religion, belief, opinion, state of health or any other personal attribute. We actively promote a diverse, equal, and inclusive work community where everyone can feel they belong and are valued for who they are.

We assess the realisation of equality in the workplace and continuously develop working conditions and the practices applied when making personnel-related decisions. Our workplace has a statutory equality plan concerning pay and other terms of employment, which we follow.

3.3 Consumer safety

We ensure that our products and services meet high quality and safety standards to protect our customers and maintain their trust. We take customer wishes into account when developing our operations. We respond to customer feedback and engage in open dialogue with our customers. We handle customer complaints carefully and ensure that customers can visit Hesburger restaurants safely.

We protect the privacy and confidentiality of customer data and safeguard personal data appropriately. We guarantee data subjects the right to access their own personal data.

3.4 Cooperation involving children

We always act responsibly in cooperation involving children and respect their rights and well-being in accordance with the principles of the UN Convention on the Rights of the Child. Marketing, communication and sponsorship aimed at children are based on ethical principles as well as applicable laws and self-regulatory guidelines. We

ensure that our personnel are familiar with the principles and practices of working with children.

We offer family-friendly services, such as play areas that are properly designed and maintained to ensure children's safety and comfort. In charity and responsibility collaborations, children's participation always respects their best interests and takes place in cooperation with schools and, where necessary, with children's guardians.

If minors work in our company, for example in internships or summer jobs, we ensure that their employment complies with applicable legislation and good labour practices. We pay special attention to the suitability of tasks for young workers, occupational safety and proper guidance.

3.5 Good business practices

We are committed to following good and honest business practices in all our operations. We provide all the information about our products that may be relevant to a customer's decision-making. In marketing, we do not give untrue or misleading information about our products, our company or our competitors, nor do we use improper or unethical practices. In consumer disputes, we aim for conciliatory solutions that satisfy both parties.



★ 4. GOOD GOVERNANCE

We are committed to responsibility principles in line with good governance practices, such as avoiding conflicts of interest, preventing corruption and bribery, combating money laundering, complying with tax legislation, promoting fair competition and establishing appropriate reporting channels.



4.1 Conflicts of interest

A conflict of interest refers to a situation in which one or more individuals or entities have competing interests that could improperly influence decision-making or actions and cause harm from the perspective of the customer or the company. A conflict of interest may arise from personal, professional or business-related reasons. Employees must report any potential conflicts of interest. We are committed to avoiding situations where an employee's personal interests conflict with the company's interests. Transparency and honesty are fundamental to our operations.

4.2 Corruption, bribery and taxation

We have a zero-tolerance policy towards bribery, extortion and other forms of corruption. Corruption – the abuse of entrusted power for private gain – is strictly prohibited.

We neither accept nor offer gifts, benefits or other compensation that could affect the impartiality of our business decision-making. Offering, giving and accepting customary gifts and hospitality is permitted in business only when they are modest

in value, customary for the occasion, provided openly and not intended to influence decision-making with any expectation of return. In unclear cases, an employee must report the matter to their supervisor or through the ethical channel before accepting a gift or benefit.

Responsible tax payment is an important part of our corporate social responsibility, as it supports the well-being and development of society. We comply with tax laws, avoid aggressive tax planning and apply transparent and efficient tax practices. We fulfil our employer contribution obligations, maintain our accounting in accordance with the Accounting Act, and meet our payment obligations properly.

4.3 Responsible procurement and fair competition

Responsible procurement is a key part of our sustainable business and has wide-reaching environmental, social and economic implications. We make purchases based on actual need and on market terms consistent with good practice. To ensure cost-efficiency, we tender our procurements in accordance with our procurement guidelines. In our procurement decisions, we take into account, among other things, environmental aspects and human rights. We also require our suppliers of goods and

services to commit to responsible business practices and to otherwise comply with good business conduct and legal obligations.

We particularly value genuine partnership and long-term cooperation. We follow our established procurement processes and are diligent in selecting partners. We communicate openly about our operations, including all suppliers we use, manufacturers of raw materials and countries of origin. As part of contract negotiations, we bind our suppliers to Hesburger's corporate responsibility principles, which cover, among other things, social responsibility and ethical business conduct. We carry out risk-based assessments and continuous monitoring of our suppliers' responsibility performance. We regularly evaluate human rights, labour and environmental risks and impacts related to our suppliers, taking these into account in supplier selection and contract negotiations.

We are committed to the principles of fair competition because we consider the proper functioning of market, consumer interests and fairness to be important values. We follow our own pricing strategy and do not discuss pricing matters with our competitors.

4.4 Payment practices

We are committed to paying invoices within the agreed deadlines and ensure that our payment terms are clear and fair. We systematically monitor payments and prevent delays in advance. We recognise that SMEs are important partners for us, for whom timely payments are particularly significant due to their limited financial flexibility. We want to be a reliable and responsible partner and treat all our suppliers equally and fairly. We honour agreements in accordance with good business practice and ensure that our payment practices are transparent and consistent for all parties.

4.5 Communication and confidential information

Communication is an important part of our marketing and through it we build our company image. All our communication is truthful, and we always strive for open interaction. In our marketing, we present product, price and other information to customers clearly and truthfully and do not use misleading expressions.

Only designated persons within the organisation are authorised to discuss Hesburger matters with the media or on behalf of Hesburger on social media. We keep private

and work-related communication separate. We act responsibly on social media and do not make incorrect statements.

We respect both our own and our partners' trade secrets and keep confidential information to ourselves. We always ensure that confidential information is properly protected, including when travelling.

Confidential information includes, for example, trade secrets, business ideas, processes, recipes, tender documents, personnel matters and accounting information. We do not disclose confidential information that we have learned through employment. We always enter into a non-disclosure agreement before entering into negotiations that may involve confidential information. We treat information received from customers as strictly confidential.

4.6 Data protection and information security

We protect the personal data of our customers, employees and other stakeholders with due care and in accordance with the law. We comply with applicable data protection legislation, such as the EU General Data Protection Regulation (GDPR). We maintain a high level of data protection and information security.

We store personal data securely, and their use is restricted solely to the purposes defined in the privacy policy, such as providing services and maintaining and developing customer relationships. We protect personal data with appropriate technical and organisational measures. We continuously develop our data protection and information security practices and train our personnel on related obligations and risks.

We use new digital technologies, such as artificial intelligence and data analytics, responsibly and ethically. We ensure that the use of new technology is transparent and respects privacy. We regularly assess the impacts of using new technologies.

4.7 Whistleblower protection

We encourage our employees to report any irregularities they observe at work to their immediate supervisor so that we become aware of them and can respond as effectively as possible. We have appropriate whistleblower protection measures in place to uncover misconduct, protect employees and increase the transparency of our operations. We provide our personnel, job applicants, former employees as well as the employees of our partners with an anonymous Whistleblowing channel through which problems can be reported without risk of negative consequences for the whistleblower. Whistleblower protection also covers the reporting of violations of this Code of Conduct.

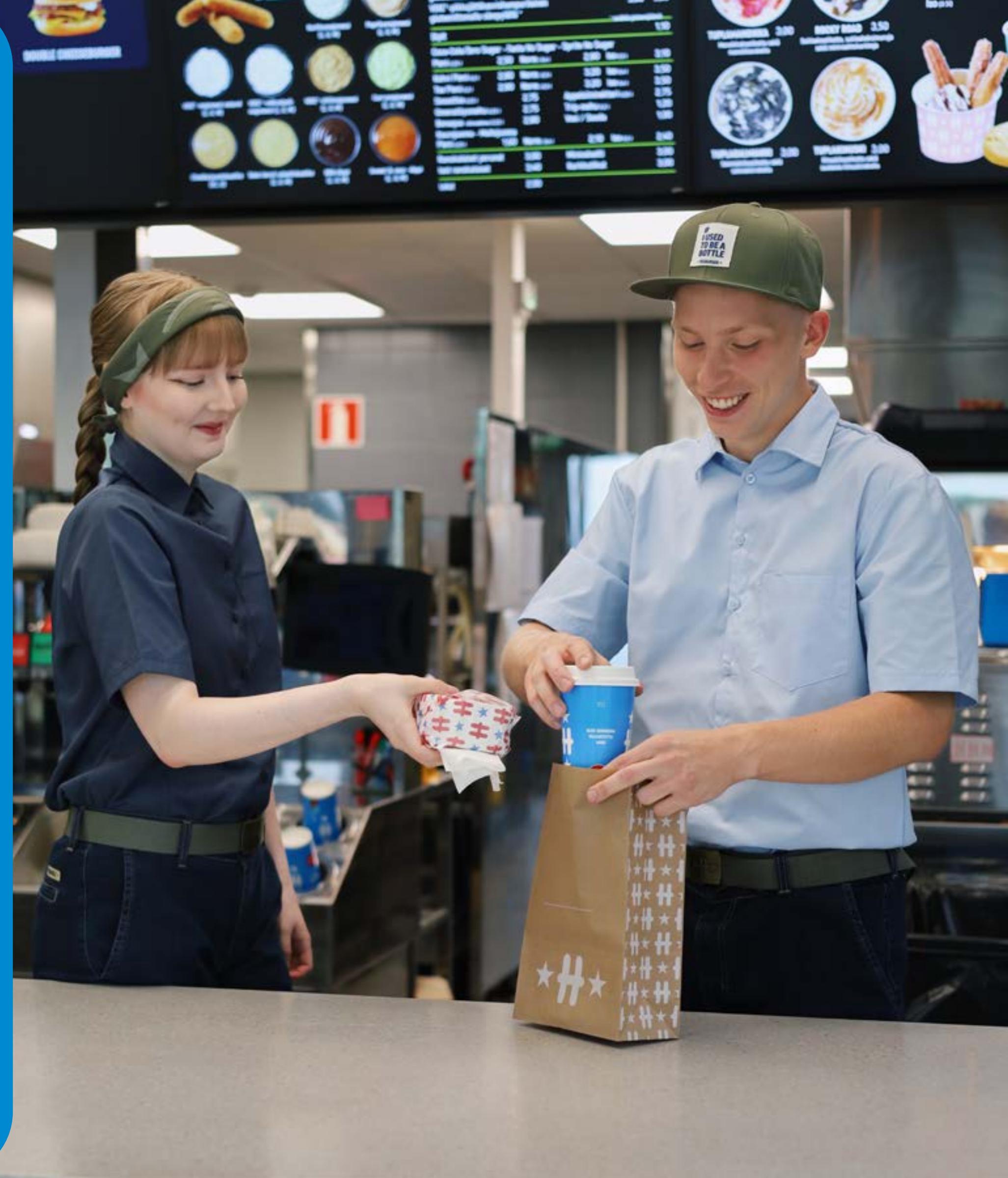


★ 5. REVIEW AND UPDATES

We are committed to regularly reviewing and updating this Code of Conduct to respond to changes in legislation and to maintain the highest ethical standards in the industry. This ensures that the Code remains effective and relevant.

5.1 Training and monitoring of the Code of Conduct

We provide regular training to all our employees on the content and obligations of the Code of Conduct. We monitor compliance with and the effectiveness of the guidelines as part of our responsibility management system.





6. EVALUATION

When assessing whether a business transaction or other decision meets the criteria of the company's Code of Conduct and professional and ethical conduct, ask yourself:

- ☒ 1. Is the action in compliance with legislation and regulatory requirements?
- ☒ 2. Is the action in accordance with the company's internal guidelines?
- ☒ 3. Has the matter been handled correctly and independently?
- ☒ 4. Does the action appear acceptable from the outside?
- ☒ 5. Could an honest and comprehensive account of what happened be given?
- ☒ 6. What would our stakeholders think of the action if it became public, for example on social media or in the press?

If the answer to any of the above questions is negative or if your own assessment of the situation is uncertain, the transaction should not be entered into or the decision should not be made. Instead, the matter must be promptly reviewed with your supervisor.