Excellence through Integrity

ALDI U.S. Code of Conduct

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Dear Employees,

Here at ALDI, we are all devoted to upholding a reputation that is built on fairness, honesty and integrity. Not only are we responsible for complying with laws and regulations but it is our obligation to go beyond that and constantly exhibit professional and personal integrity.

We are all personally responsible for the way we conduct ourselves, and an important step in meeting these ethical responsibilities is the shared commitment we have when interacting with the people around us. As the ALDI Management System (AMS) states, *The focus of our Company is our people.* The display of an exemplary attitude can be contagious; therefore we should honor our core value of *responsibility* and be fair, honest and positive in all that we do. Furthermore, the same dedication with which we serve our customers, business partners, communities and each other should also be reflected in the commitment to our ethical standards.

As employees, another part of our ethical commitment is to report behavior or actions that are unethical or illegal. We put our trust in you to report any misconduct to your Direct Leader or the ALDI Reporting Line.

The ALDI U.S. Code of Conduct is a reference guide and can help us gain a further understanding of our responsibilities as employees to ensure we are always doing the right thing.

Thank you for the hard work and determination you put forth every day. Your constant devotion to honesty and integrity are the foundation to which we owe our success.

1

Our Commitment to Ethics and Compliance





1.1 Introduction to Using the Code

Each of us has a responsibility to always act with integrity and follow the law. To help us meet these responsibilities, we've developed a Code of Conduct (Code) which is designed to serve as a resource when we need additional guidance about policies and standards or when we are faced with a difficult ethical situation.

It is impossible to anticipate every question or situation that might arise so in addition to the Code, we also have shared other resources and situational examples that can be of help. For your reference, these additional resources are listed throughout the Code.

The Company relies on each of us to use good judgment and to seek help when needed. Rules do not replace sound judgment and common courtesy. As always, one of the best sources of help available to us is each other. We know that we can rely on our co-workers and leaders to help us make the best and most ethical decisions.

1.2 Who Should Follow the Code

The information in this Code applies to all employees of ALDI, regardless of position. But bear in mind that certain sections of the Code may be more or less relevant to you depending on your role.

Our business partners serve as an extension of our Company and their conduct can have an impact on us. They too are expected to follow the spirit of this Code as well as any applicable contractual provisions when working on behalf of ALDI. If you are in a position that supervises our business partners, you are responsible for helping them understand our ethics and compliance standards. If a business partner fails to comply with ethics and compliance expectations and their related contractual obligations, it may warrant termination of their relationship with ALDI.



1.3 Our Responsibilities

Each of us is a representation of ALDI and therefore, it is our responsibility to uphold ALDI's position as a reputable and honest company. This means we are expected to:

- Act in a professional, honest and ethical manner.
- Be familiar with the information contained in this Code as well as Company policies.
- Promptly report concerns about possible violations to your Direct Leader or the ALDI Reporting Line.

1.3.1 Manager and Supervisor Additional Responsibilities:

- Be a role model for ethical leadership and support employees when they ask questions or raise concerns.
  - Encourage others to speak up.
  - Deal with concerns when they are raised.
  - Ensure that no one who speaks up suffers retaliation.
- Help co-workers, suppliers and our business partners understand the requirements of the Code that apply to them.
- Be consistent when enforcing our standards and holding others accountable.

2

Making the Right Decisions and Raising Concerns





2.1 Situational Guidance

Making the right decision is not always easy. There will be times when we may be under pressure or unsure of what to do. Always remember that co-workers and management are available to help and there are other resources to turn to, including those listed in this Code.

When faced with a difficult decision, it may help to ask yourself these questions about an action you are considering:

- ✓ Is it legal?
- ✓ Is it consistent with our policies, our values and this Code?
- ✓ Have I considered all of the risks involved?
- ✓ Would I still be comfortable with the decision if someone found out about it?

If the answer to any of these questions is "No" or you are uncertain, stop and ask for guidance.

2.2 Asking Questions or Raising Concerns

Not only do we have a responsibility as individuals to be sure that we are making the best decisions, but we also have a responsibility to help ensure others are doing so as well. If you see or suspect any illegal or unethical behavior or need help making an ethics or compliance decision, there are several options available to you:

- ❖ Talk it through with your Direct Leader.
- ❖ Discuss it with your Personnel Leader or any other ALDI management representative. ALDI has an open-door policy, which means you can contact any management personnel with whom you feel comfortable.
- ❖ Contact the confidential ALDI Reporting Line:
  - Telephone, toll-free, at 1-844-400-5044
  - Online at https://aldi-sued.integrityline.app/
- ❖ Report any urgent problems (i.e. safety or health hazards) to the local authorities in order to obtain the fastest response.



ALDI is committed to reviewing all potential violations and will handle each report fairly and reasonably. Remember, an issue can only be addressed if it is brought to someone's attention.

2.2.1 Using the ALDI Reporting Line

The ALDI Reporting Line is a confidential way to report concerns about ethics. The Reporting Line is operated by an independent company with multilingual operators on staff and is available 24 hours a day, 7 days a week. Employees may choose to remain anonymous when reporting concerns.

When an employee calls the ALDI Reporting Line, the operator will listen to the concern or question, ask clarifying questions, and then write a summary report of the call. The summary will then be provided to ALDI leadership for assessment and further action, as needed.

After making a report, the caller will receive an identification number so they can follow up on the concern. Following up is especially important if the report is submitted anonymously, as the Company may need additional information in order to conduct a thorough investigation. This identification number will also enable the caller to track the resolution of the case. Out of respect for privacy, ALDI will not be able to inform the caller about individual disciplinary actions.

Any report made to the ALDI Reporting Line will be kept confidential to the extent possible.

2.3 Policy Against Retaliation

ALDI strictly prohibits any employee from treating any other employee, former employee, or applicant less favorably for making a good faith report of harassment, discrimination, or retaliation; assisting another employee or applicant in making a report of such conduct; cooperating in an investigation into such alleged conduct; or instituting a legal action.

If you experience or witness any conduct you believe to be retaliatory, immediately report the matter using any of the resources listed in this Code.

Any employee found to be in violation of this policy or to have otherwise interfered with the investigation of a complaint, may be subject to disciplinary action, up to and including termination.

3

Upholding an Ethical Work Environment





3.1 Discrimination and Anti-Harassment

ALDI values inclusion and appreciates the uniqueness of each employee, customer, supplier and business partner. Our commitment to inclusion is consistent with our values of respect and openness. With various backgrounds, talents and ideas, our Company is even more successful.

ALDI encourages its employees to treat each other fairly and respectfully and encourage others who work with ALDI to also meet these expectations. We base all hiring and advancement decisions on individuals' qualifications and performance and prohibit employees from making employment decisions on race, color, religion, sex, gender, age, citizenship, national origin, disability, pregnancy, or any other legally protected status as outlined in our Equal Employment Opportunity Policy.

We will not tolerate any form of discrimination or harassment, and require all employees to take steps to create a work environment free of all forms of harassment and discrimination, including unwanted sexual advances, intimidation, inappropriate physical contact, or any other similar offensive behavior.

In addition, employees are prohibited from making threats of physical violence or engaging in physical violence against customers, co-workers, or business partners.

3.2 Safe and Healthy Work Environment

Safety is about more than just following the rules. We should all be aware of safety and health risks as we go about our jobs. Each of us is a role model for safety and is encouraged to work in a way that helps ensure the safety and health of our co-workers, customers and business partners. Report any unsafe working conditions or ergonomic hazards to management so immediate action can be taken.

- Using, possessing, consuming, or being under the influence of illegal drugs, alcohol, or inhalants is not permitted while working; operating Company vehicles, machinery, or equipment; being present on Company premises; or being present in any other location performing services for ALDI.
- Buying, selling, or manufacturing illegal drugs on Company premises or while performing services for the Company is prohibited.



- Physical threats, intimidation, and/or violence towards anyone at work, including co-workers, customers, or business partners, is prohibited.
- Bringing firearms, knives, or other dangerous weapons onto ALDI property, or threatening to do so, is prohibited, except to the extent that state law expressly permits employees to keep a firearm locked securely in their vehicle located in a Company parking lot.

3.3 Product Safety and Quality

ALDI complies with consumer legislation and safety standards. The safety and quality of our products is our number one commitment to our customers. Each of us should do our part to help the Company meet or exceed professional industry standards and to help ensure that our high standards are met throughout the entire supply chain.

- If you believe there is a consumer safety issue, notify management immediately so that the products affected can be identified and appropriate action can be taken.
- Managers and supervisors have additional responsibilities to help ensure product safety and quality:
  - Encourage co-workers to be alert and proactive in order to protect consumer safety and product quality.
  - Deal immediately with product safety and quality concerns when they are raised, and appropriately quarantine any affected product found in a store or warehouse.

3.4 Wage and Hour

It is important that all hourly employees are fully compensated for all time worked. Additionally, breaks are an essential part of helping keep employees safe, responsive and efficient throughout their shift.

- It is a serious violation of both law and ALDI policy for a manager or supervisor to ask an employee to work without compensation.
- Working "off the clock" (working without being paid) is never permitted.
- Employees must clock in and out for break and meal periods.
- If a full break cannot be taken, notify your manager to be credited for the unused portion of the break.

4

Maintaining Professional Relationships





4.1 Supplier Relations

Our suppliers and business partners are integral to doing business and meeting our customers' expectations. This is why we are selective and use a transparent process for awarding business based on objective criteria and our commitment to quality.

Supplier relationships are a critical component of certain employees' responsibilities. These employees represent the integrity and ethical standards of ALDI to the supplier base. It is important that ethical boundaries are established within these relationships.

- Engaging in behavior that benefits an employee personally is strictly prohibited.
- Conduct due diligence on new suppliers.
- Share with suppliers and business partners our stance on ethics and the expectation to act in a way that is consistent with our Code.
- Be alert to any suspicions that a business partner may not be meeting our standards or their contractual obligations.

4.2 Conflicts of Interest

A conflict of interest is a personal, financial or political activity that affects our ability to make an unbiased decision. Therefore, it is important that all purchases, sales and other business decisions are not made based on personal incentives or situations that can be perceived that way.

Avoiding any potential conflict of interest is the best approach. It is also important to talk to your Direct Leader about any other potential conflicts. As a team, we can better address the situation.



The following are common types of conflicts of interest:

4.2.1 Family and Personal Relationships

It is possible that a relative or close friend may be working at ALDI or is a supplier or business partner. Favoritism towards relatives or friends should not play a role in business decisions. In some cases, it may be difficult to recognize, but the situation should be disclosed to your Direct Leader as soon as possible.

Employees at all levels are permitted to refer qualified family members or close friends for roles that are not in their direct reporting line; however, hiring managers should not be influenced to prioritize senior level leadership recommendations over others.

4.2.2 Personal Relationships with Suppliers

Our supplier relationships are based on fair and lawful business practices. The selection of suppliers must be made on the basis of objective criteria, including integrity, quality, price, delivery, adherence to schedule and product suitability. Employees shall not establish personal relationships with suppliers that create a direct or indirect conflict of interest.

4.2.3 Outside Employment

Employees are encouraged to share outside employment with their Direct Leader. The employee has the responsibility to ensure that the outside activity does not interfere or detract from their work at ALDI. Working for a competitor or supplier may raise additional conflicts that will need to be discussed with management. Also, any side or personal business may not do business or compete with ALDI.

4.2.4 Personal Investments

Employees have a responsibility to make sure personal financial activities do not conflict with their responsibilities at ALDI. A financial conflict of interest can arise when judgment could be influenced, or might appear as being influenced, by the possibility of personal financial gain.

4.2.5 Corporate Opportunities

If we learn about an opportunity (i.e. property, new suppliers, etc.) while conducting business on behalf of ALDI, we should not personally accept that opportunity. If there is any question as to who is entitled to the opportunity, please discuss it with your Direct Leader.



4.3 Gifts and Business Entertainment

Accepting gifts and business entertainment can cause a conflict of interest, or the appearance of a conflict between personal interests and professional responsibility. If not handled carefully, the exchange of gifts and entertainment can be misinterpreted as influencing a business decision.

4.3.1 Donations and Sponsoring

Donations made by ALDI will be provided as social commitment in a transparent way and on a voluntary basis without expecting any service in return. The purpose of the donation, the recipient and the donation receipt are documented in order to ensure transparency.

ALDI does not make any direct or indirect donations to political organizations, parties or individual politicians.

All sponsoring activities must be based on a written agreement and rendered in proportion to the promotional services received.

4.3.2 Accepting Gifts

Employees are not allowed to accept tangible gifts or other gifts from suppliers/business partners for personal use with the exception of gifts or promotional items under a nominal value (less than $50). However, such gifts shall only be accepted if these gifts do not affect the business decisions of the accepting party, or would otherwise be inappropriate.

Other exceptions from the defined threshold value can be made if rejecting the gift would be considered impolite or offensive. In this scenario, gifts must be approved by the employee's Direct Leader and such gifts must be donated to a charity. In all cases, accepting cash is prohibited.



4.3.3 Business Meals

Business meals are acceptable, provided they are conducted appropriately and are in the context of usual business collaboration. The occasion, type, frequency and scope of the meal should be taken into account. Meals within the context of usual business collaboration may be paid for by either ALDI or the supplier/business partner.

4.3.4. Invitations to Events

Invitations from suppliers/business partners to events must not generally be accepted, except where event tickets are purchased by the employee at the current market price and approval to attend has been granted by the employee's Direct Leader.

4.3.5 Obtaining Goods or Services for Personal Use

Goods or services for personal use may only be obtained from suppliers/business partners if all of the following requirements are fulfilled:

- Procurement of the goods or services has been approved by the employee's Direct Leader.
- The employee's area of responsibility does not include a professional relationship with the relevant supplier/business partner (i.e., Real Estate Directors may not obtain services from general contractors who have worked on ALDI construction projects; Corporate Buying employees may not purchase goods from a supplier from their buying area).
- The goods or services are not sold at terms better than the ALDI terms.
- Invoices are directly addressed to the employee.

4.3.6 Anti-corruption and Bribery

Bribery and corruption are completely contrary to our values and business standards. We do not give or accept bribes or kickbacks, offer facilitation payments or provide or accept any other form of improper payment.

- Even the perception by others that we may have crossed the line can be damaging. For this reason, always be aware of how our actions might be viewed by others and err on the side of caution.



- Corruption may involve either public officials or individuals in the private sector.
- Bribes are not limited to cash payments. Bribes can also include discounts, services, charitable contributions, travel and excessive meals or entertainment.

4.4 Acquiring Information About our Competitors

When collecting business intelligence, each of us, and others who are working on our behalf should live up to sound and ethical practices and never engage in fraud, misrepresentation or deception to obtain information.

When we hire former employees of competitors, we recognize and respect any valid legal obligations of those employees. Avoid asking employees to disclose the confidential information of their former employers.

- Obtain competitive information only through legal and ethical means.
- Do not contact a competitor to obtain their confidential information.
- Ensure that third parties acting on our behalf live up to our standards.

4.4.1 Competing Fairly

ALDI is committed to free and open competition. We gain our competitive advantages through superior performance rather than through unethical or illegal business practices. Competition laws are complex and compliance requirements can vary based on the circumstance. The following activities are considered “red flags” and should be both avoided and reported to your Direct Leader:

- Entering into anti-competitive agreements with competitors, including price fixing, bid rigging, market allocation and agreements to restrict supply.
- Exchanging competitively sensitive information with competitors.
- Imposing restrictions on customers or suppliers.
- Abusing a position of market dominance.
- Entering into certain mergers and acquisitions.

5

Protecting Information and Assets





5.1 Protecting ALDI Assets

We are entrusted with company assets and are personally responsible for protecting them and using them with care. Our assets include facilities, inventory, property and equipment, confidential and proprietary information and company funds.

- Be responsible for ALDI property and assets and make sure that they are not lost, damaged, put at risk or misused.
- Passwords should not be given to other people, including other ALDI employees or someone claiming to represent ALDI, and should be changed if the password is compromised.
- Company provided credit cards can only be used for business purposes.

5.2 Protecting the Privacy of Customer Information

When customers share their personal information with ALDI, they expect us to keep that information safe. If we break that trust, we will damage our reputation and our relationship with our customers. We are entrusted to ensure that only people with a business need have access to the information we create, share and store.

- Be familiar with the types of customer information which are given heightened protection by the law and Company policy (i.e., personally identifiable information, government issued identification numbers and bank account numbers) and protect them through appropriate means.
- Never share confidential customer information outside the Company except as authorized.
- Immediately report any loss, theft or attempted theft of confidential customer information.
- Guard against any unintentional exposure of customer information in public settings, such as on phone calls or while working on electronic devices.



5.3 Company Confidential Information

ALDI confidential information includes all non-public information about the Company's business performance or plans that if disclosed might be of use to competitors or could be harmful to the Company, our customers, suppliers or other business partners. Examples include sales data, pricing, real estate leases, purchase of potential site information and information about potential products and product formulation.

- Ensure such information is not disclosed to individuals, the media or marketing surveyors with regard to ALDI ownership, management or business activity.
- Guard the Company's intellectual property and respect the intellectual property rights of our customers and business partners.

5.4 Creating, Maintaining and Securing Business Records

Business partners, government officials and others rely on the completeness and accuracy of our financial disclosures and business records. Accurate information is also essential within ALDI so that we can make sound business decisions. Each of us is responsible for protecting these business records.

- Ensure all transactions are properly authorized and are recorded accurately and completely.
- Follow applicable laws and Company policies when creating, retaining or destroying documents including those in electronic formats.
- Documents should be destroyed in accordance with our record retention policies and never in response to or in anticipation of an investigation, audit or legal matter.
- All documents, binders, planners, electronic devices and storage media (CDs, flash drives, etc.) should be secured prior to leaving for the day.



5.5 Communicating with the Public

It's important that our public communications are clear and consistent. Communications with the public and the media on behalf of ALDI should be handled by senior management, and on a larger scale, the ALDI Public Relations department.

- If you are contacted by the media to speak on behalf of the Company, respectfully decline any response and share this situation with your Direct Leader.
- If a reporter with a camera enters ALDI property and/or tries to interview customers or staff, explain that you are not authorized to comment for ALDI and contact your Direct Leader immediately.

5.5.1 Using Social Media

The use of social media has grown significantly in recent years. If used appropriately, social networking websites may be an efficient means of sharing information. However, if not done properly, use of social media may expose the Company to additional risk.

- Avoid posting or discussing customer or Company confidential information about ALDI business as described in this Code.
- Social media networks should not be used as a platform to conduct ALDI business.

6

Contributing to Society and Complying with the Law





6.1 National Sustainability

ALDI conducts its business according to the principle of National Sustainability. The ALDI National Sustainability Principles describe how we apply this throughout the areas of our business operations: Customers, Supply Chain, People, Community, Environment.

Simplicity, consistency, responsibility — these are our core values. Our business model is simple: great quality at the best price, fair and honest product offers, and efficient business processes. As a reliable partner, we are true to our word. In all we do, we assume responsibility towards our customers, business partners, employees, the community, and the environment.

- ALDI does not tolerate child labor, any form of forced labor and related practices, or the use of corporal punishment, mental or physical coercion or verbal abuse.
- Report to your Direct Leader any suspicions that the Company or business partners are violating national laws or industry standards.
- Be proactive and look for ways to reduce, reuse and recycle waste and use energy more efficiently.

6.1.1 ALDI 'Social Standards in Production'

We articulate our expectations clearly to all our suppliers and business partners. Together with our suppliers, we work towards increased transparency and continuous improvement within the supply chain. We strive to increase the share of sustainable resources used in our products and to minimize the negative ecological and social impacts of production. We are committed to establishing and further developing social and environmental standards throughout the supply chain.

The ALDI 'Social Standards in Production' define our commitment to human rights and fair labor standards. They are based on:

- The International Labor Organization (ILO) Conventions.
- The Human Rights, Declaration of the United Nations.
- The UN Convention on the Rights of the Child.
- The UN Convention on the Elimination of All Forms of Discrimination against Women.
- The OECD Guidelines for Multinational Enterprises.



The ALDI 'Social Standards in Production' reflect our minimum requirements, which we strive to exceed wherever possible. We expect all our suppliers and business partners to adhere to these standards and further specific requirements which go beyond these standards and which have become part of the contractual relationship. Our suppliers and business partners are expected to apply these standards to all sub-suppliers throughout the entire production process.

6.2 Audits and Investigations

Many of our operations are subject to routine audits or inspections by government agencies that regulate our business. The inspections or audits could include looking at our files and records, making onsite inspections of our facilities or submitting requests for information. As responsible employees, we should be willing to cooperate with government inquiries, audits and inspections. While carefully protecting our interests, we should be open and honest about our business.

- Be courteous and truthful with government officials conducting an inquiry.
- The information given to government or regulatory officials must always be true and accurate.
- OSHA inspections can occur at any time and without advance notice. The appropriate leader or appointed alternate should accompany the inspector at all times.
- Inspectors will typically ask to review written records at some point during an inspection. Certain records must be made available, but only as requested.
- Preserve records and information relevant to any government or regulatory agency inquiry or any litigation.

6.3 Insider Trading

Insider trading laws are intended to help create fairness in the financial marketplace. Although ALDI is a privately-held company, during the course of business we may become aware of information about publicly traded companies that is not yet widely available. Using this "inside information" for personal gain, sharing it with others or spreading false rumors is illegal and against our values.



- Never buy or sell any securities of any company when in possession of inside information.
- Trading indirectly, for example through family members or others, providing tips or encouraging others to trade are also possible violations.

6.4 Global Trade

Countries and jurisdictions need to control the import and export of products and services that travel across their borders. For this reason, we honor all trade, import and export laws in the countries where we operate. If there is a conflict, or if you are not sure what laws apply, consult with your Direct Leader.

- Some countries impose trade restrictions covering specified countries, entities and individuals. Consult with Corporate Buying immediately if you are asked to deal with a sanctioned or restricted country, entity or individual.
- Import and export restrictions often change. If you are involved in import and export, make sure you are up-to-date on the relevant rules.
- Be especially careful and ask for guidance when transferring data or technological devices across borders or to individuals from sanctioned countries.

6.5 Outside Political Activities

We respect the right of employees to participate in the political process, including making personal political contributions. However, it should be clear that we are acting on our own behalf and our actions are not those of ALDI.

Corporate political contributions are limited by laws in the locations where we operate.

- ALDI does not make any direct or indirect donations to any political candidate, government official, political party or special interest group.
- Distributing political bulletins, literature, advertising or other printed matter during working time or in working areas is prohibited.

7

Accountability





Violations of laws, the Code or other Company policies may result in disciplinary action up to and including termination of employment. Certain actions may also result in legal proceedings, penalties or criminal prosecution.

8

Waivers and Exceptions





ALDI will regularly reassess this Code and recommend changes to the Office of the President for approval. In very limited circumstances, the Company may find it appropriate to waive a provision of the Code. When this is necessary, all required disclosures will be made.

9

Living our Values Every Day





Our Code covers many of the ethics and compliance situations that we are likely to face while at work, but of course it is not possible for a code to cover every situation. Therefore, always remember that we have other resources available that can help us make good decisions every day.

- The most important resource is you. Rely on your experience and good judgment. In order to make informed decisions you can always reference the policies, standards and rules, particularly those related to your job, that are available to you.

- In any situation, if you're not sure what to do, count on your colleagues and leaders. At ALDI, we work as a team so don't be afraid to ask questions and seek help.