



# CODE OF CONDUCT FOR H. & J. Brüggen KG



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## I. Foreword and Objectives

The Brügger Group — a family-owned company with a rich history dating back over 150 years — focuses on the purchasing, production and sale of safe foods that comply with the respective food laws, national and international legislation and social and environmental standards.

The provisions of the United Nations Guiding Principles on Business and Human Rights (UNGPs) and the recommendations of the International Labour Organization (ILO), which we have used as a reference in the development of our Code of Conduct, provide an important foundation for our relationships with our employees, our stakeholders and our business partners along the entire supply chain.



The managing directors of H. & J. Brügger KG  
from left to right: Jochen Brügger, Johannes Brügger, Hanno Brügger

## II. Principles

This Code of Conduct outlines our business principles and establishes a framework for constructive, long-term business relationships based on mutual trust and respect. All employees and business partners are obligated to observe these principles. Compliance is monitored and evaluated by the Brügger Group on a regular basis in order to ensure adherence to the guidelines and prevent potential conflicts with this Code of Conduct.

### II.1. Occupational Health and Safety

#### Health and Safety

A safe and hygienic working environment shall be provided in accordance with the applicable national and international standards and laws. Issues related to health and safety at the workplace are covered in initial training sessions. In the context of training programmes, employees are provided with all information required to perform their work (e.g. the operation of machines/equipment).

Furthermore, a system shall be implemented to identify, record and evaluate potential risks to the physical and mental health and safety of employees and for developing measures aimed at the elimination of these risks. Occupational health care is available.







### **Discrimination and Harassment**

Discrimination of any kind is unacceptable; in accordance with Art. 3 of the German Basic Law and Art. 21 of the Charter of Fundamental Rights of the European Union, no employee may be discriminated against or given preferential treatment on the basis of their sex, ancestry, race, skin colour, language, place of birth, ethnic or social origin, religious or political opinions or faith, and no employee may be discriminated against on the basis of a disability. This principle applies throughout the application phase and the period of the employment contract. The display and dissemination of pornographic material is prohibited.

### **No Child Labour**

Any form of child labour is prohibited. Compliance with this principle is ensured on the basis of the legal minimum age of 15 years, unless exceptions are permitted in accordance with the ILO conventions.

### **Special Protection for Young Workers**

Young workers require a higher level of protection. In this context, special attention must be paid to physical and mental health, as well as support.

Employees under the age of 15 may not perform any work that endangers their health or interferes with their schooling. Employees under the age of 18 may not perform any work that endangers their health or any night work.



### **No Forced Labour**

Forced labour of any form is strictly forbidden. In this context, it is also prohibited to force an employee to continue work by withholding their wages/salary, social benefits, property or documents. All work is performed on a voluntary basis. Prior to the start of their employment, every employee shall receive a written employment contract. Employees are not required to make any kind of “deposit” or submit their identity documents for retention. Employees have the right to terminate their employment contract at any time, taking into consideration the notice period specified in the employment contract. A termination of one’s employment contract shall not result in penalties or wage reductions.

### **Appropriate Remuneration for Employees**

The appropriateness of an employee’s remuneration must be ensured by observing the laws and regulations concerning minimum wages and social benefits. Furthermore, any remuneration standards established through collective bargaining must be observed. These measures should ensure that employees are paid enough to maintain a decent standard of living for themselves and their families. Remuneration is paid at regular intervals (at least monthly). The use of wage deductions for disciplinary purposes is not permitted. The company provides all social benefits required by law.





### **Reasonable Work Hours**

National laws, industry standards and collective agreements provide the basis for determining the maximum number of hours to be worked. The total number of work hours must also be in compliance with ILO conventions.

Overtime work must be in compliance with national legislation; accordingly all overtime work is voluntary and to be considered an exception. It can only be performed in observation of the required rest period. Employees shall be compensated for overtime hours. Every employee is entitled to at least one day off per week.

### **Avoidance of Precarious Employment Conditions**

All employees receive comprehensible, written information on the decent working conditions to be ensured, such as working hours, remuneration, rights and obligations.

### **II.II. Rights and Freedom of Association, and Right to Collective Bargaining**

All employees have the right to free assembly and collective bargaining. If these rights are not secured in national legislation, the respective ILO conventions are to be applied. The employee's rights of association and right to collective bargaining must be respected. Employees have the right to join or found trade unions and to support collective bargaining.







### II.III. Environment and Sustainability

National and international legislation and environmental standards provide the basis for sustainable and efficient resource-management practices. Environmental consciousness and sustainability efforts should be promoted. The company strives to use resources in an efficient and sustainable manner in order to minimise its environmental impact. Airborne emissions and the disposal of wastes, chemicals and discharge water are in compliance with the applicable legislation and regulations.

### II.IV. Ethical Principles

All forms of bribery, extortion, embezzlement and corruption, as well as acts of deception and counterfeiting, are prohibited. Data processing and data security must be carried out in accordance with the applicable legislation and legal requirements.

### Compliance and Implementation

In order to fulfil our social responsibility, all employees and business partners are obligated to observe this Code of Conduct. Compliance training is offered within the Brügger Group, and we expect our business partners to share the contents of this Code of Conduct with their employees. Brügger employees or business partners who have any problems understanding or interpreting this document can ask the appropriate contact person within the Brügger Group for support. Contact persons can also offer assistance with implementation problems. The “open door policy” is an important principle of our company culture.

Brügger reserves the right to carry out unannounced audits for ensuring its business partners' compliance with the specified requirements. Any violation of this Code of Conduct can lead to the termination of the business relationship.

We expect our business partners to solve any

identified problems in a timely manner, or communicate them so that, if applicable, we can work together to find a solution.

### Reporting of Violations

Currently, violations of the principles of this Code of Conduct can be reported in the following manner:

Internally: Use of the anonymous reporting system via the platform myBIP

Externally: [info@brueggen.com](mailto:info@brueggen.com)

### Entry into Force

This Code of Conduct was implemented in April 2021 and came into force on this date. The current version supersedes all previous versions of this Code of Conduct.





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