

H. & J. BRÜGGEN KG – POSTFACH 1227 – D-23502 LÜBECK

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15. April 2025

Declaration of Principles

1. Respect for human rights

H. & J. Brüggen KG - a family business with over 150 years of company history - not only focuses its attention on the purchase, production and distribution of safe food that complies with food law, but also on compliance with human and environmental rights standards in its own and upstream value chain. In particular, the aim is to promote compliance with human rights and avoid their violation.

Our Code of Conduct defines the expectations we have of ourselves and our business partners ([H.-J.-Brueggen-KG-Code-of-Conduct-April-2025.pdf](#)).

2. Respect for human rights and reference to international standards

Our business activities are based on internationally recognized standards for Business and human rights. These include:

- a) Universal Declaration of Human Rights of the United Nations (UN)
- b) United Nations Guiding Principles on Business and Human Rights (UNGP) Conventions and recommendations of the International Labour Organization (ILO) on labour and social standards
- c) Principles of the United Nations Global Compact (UNGC)
- d) UN Convention on the Rights of the Child
- e) UN Convention on the Elimination of All Discrimination against Women

H. & J. Brüggen
Kommanditgesellschaft
Amtsgericht Lübeck
HRA 160
USt.-ID-Nr. DE135 074 535

Persönlich haftende
Gesellschafter:
Hanno Brüggen
Jochen Brüggen
Johannes Brüggen

Commerzbank AG
Landesbank Baden-Württemberg
Hamburger Sparkasse AG
DZ Bank AG
Sydbank A/S

SWIFT	DRESDEFFXXX	IBAN	DE34	2308	0040	0304	1244	00
SWIFT	SOLADESTXXX	IBAN	DE06	6005	0101	0002	2965	20
SWIFT	HASPDEHHXXX	IBAN	DE59	2005	0550	1280	3416	43
SWIFT	GENODEFF200	IBAN	DE64	2006	0000	0000	1371	33
SWIFT	SYBKDE22KIE	IBAN	DE15	2102	0600	1000	6276	81

- f) Guidelines of the Organisation for Economic Co-operation and Development (OECD) for multinational enterprises and
- g) Forced Labour Priority Principles des Consumer Goods Forum (CGF)
- h) UN Women's Empowerment Principles
- i) International Covenant of 19 December 1966 on Civil and Political Rights International Covenant of 19 December 1966 on Economic, Social and Cultural Rights
- j) Minamata Convention on Mercury of 10 October 2013 (Minamata Convention)
- k) Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal of 22 March 1989 (Basel Convention)

We are committed to ensure that those groups affected by human rights violations have access to the help they need.

3. Risk assessment methodology

A risk assessment compliant with the national *Lieferkettensorgfaltspflichtengesetz* (LkSG - Supply Chain Due Diligence Act) is carried out in two steps using specialized software.

An initial, **simple assessment** evaluates the risk of all direct suppliers based on their location, their products and our purchasing volume. Criteria relating to human and environmental rights are also used here.

The **detailed assessment** includes suppliers with a potential risk that has resulted from the simple assessment. Individual risks such as the extent, probability and irreversibility of possible human and environmental rights violations are taken into account. These also result from the information provided by suppliers on legal positions in relation to human and environmental rights.

If a risk is recognized, appropriate measures are defined together with the conspicuous suppliers in order to achieve improvements.

4. Priority risks

We are aware that there may be risks of human rights violations, particularly in upstream supply chain.

Some of our suppliers are located in countries where compliance with the rule of law may be insufficiently guaranteed. Women and children, indigenous peoples and migrant workers may be particularly affected. For this reason, we have already started to expand our international supplier audits in 2021 to include compliance with social regulations and to inform our business partners about the upcoming legal expectations. We will of course continue to expand this approach and other measures in the future.

5. Preventive and remedial measures

Our approach to fulfilling human rights due diligence obligations is based on the aforementioned risk assessment. This analysis forms the basis for an ongoing process in our company and in relation to our business partners.

The protection of human rights is an integral part of our corporate culture and is integrated into our operational management processes and is continuously developed further, including risk management. We have defined specific contact persons and their responsibilities in order to fulfil our obligation to ensure the effective and sustainable implementation of human rights protection in our own and upstream value creation processes.

Special raw materials such as cocoa and palm oil and their products - product groups with an avoidably high risk probability - are purchased exclusively as certified products (RSPO, Fairtrade, Rainforest Alliance). Furthermore, we are already networked with a large number of our suppliers from high-risk origins via the internationally recognized Sedex platform ([Sedex: Sustainable business and supply chain solutions](#)). Many of our suppliers have already been audited in accordance with the requirements of the "Ethical Trading Initiative" (ETI), the "Sedex Members Ethical Trade Audit" (SMETA).

In the event that suppliers are directly responsible for human rights violations or are indirectly associated with such violations, we expect full co-operation. We are actively committed to finding appropriate solutions, such as adapting or terminating business processes. We take appropriate action in the event of misconduct by our employees.

6. Complaints mechanism

H. & J. Brüggen KG has set up a confidential and anonymous whistleblower system that offers potentially affected persons and interest groups worldwide the opportunity to report human rights violations and breaches of international agreements ([Whistleblower system form - H. & J. Brüggen KG \(www.brueggen.com\)](https://www.brueggen.com)). Access to this system is possible in different languages. As far as possible and within our sphere of influence, we protect whistleblowers from disadvantages in connection with their reports. All incoming reports and suspicions are handled in a transparent and balanced process. The systematic handling of complaints and the knowledge gained from them enables us to continuously improve our due diligence processes.

7. Responsibilities

The management and monitoring of our human rights and environmental protection strategy as part of the implementation of the legal requirements is the responsibility of the Human Rights Desk of the H. & J. Brüggen KG.

8. Documentation and reporting obligations

The report for 2024 will be submitted to the *Bundesamt für Wirtschaft und Ausfuhrkontrolle* (BAFA - Federal Office of Economics and Export Control) in accordance with legal requirements and published in an appropriate manner.

ppa. Jens Chr. Meyer
Human Rights Officer

i. A. Hanna Earley
Deputy Human Rights Officer