

Brüggen

Code of Conduct





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I. Foreword and objectives

The Brüggen Group – a family business with over 150 years of corporate history – focuses its attention on the purchase, production and distribution of safe and food-safe products that comply with national and international legal requirements, as well as on compliance with social and environmental standards. We are aware of our social, ecological and economic responsibility. With the help of our Code of Conduct, we define our expectations and princi-

ples towards our business partners. The principles and expectations set out here are based on applicable national laws, the legal requirements of the European Union and international agreements, including the United Nations Universal Declaration of Human Rights, the Guidelines on the Rights of the Child and Business Conduct, the UN Guiding Principles on Business and Human Rights and the international labour standards of the International Labour Organization.

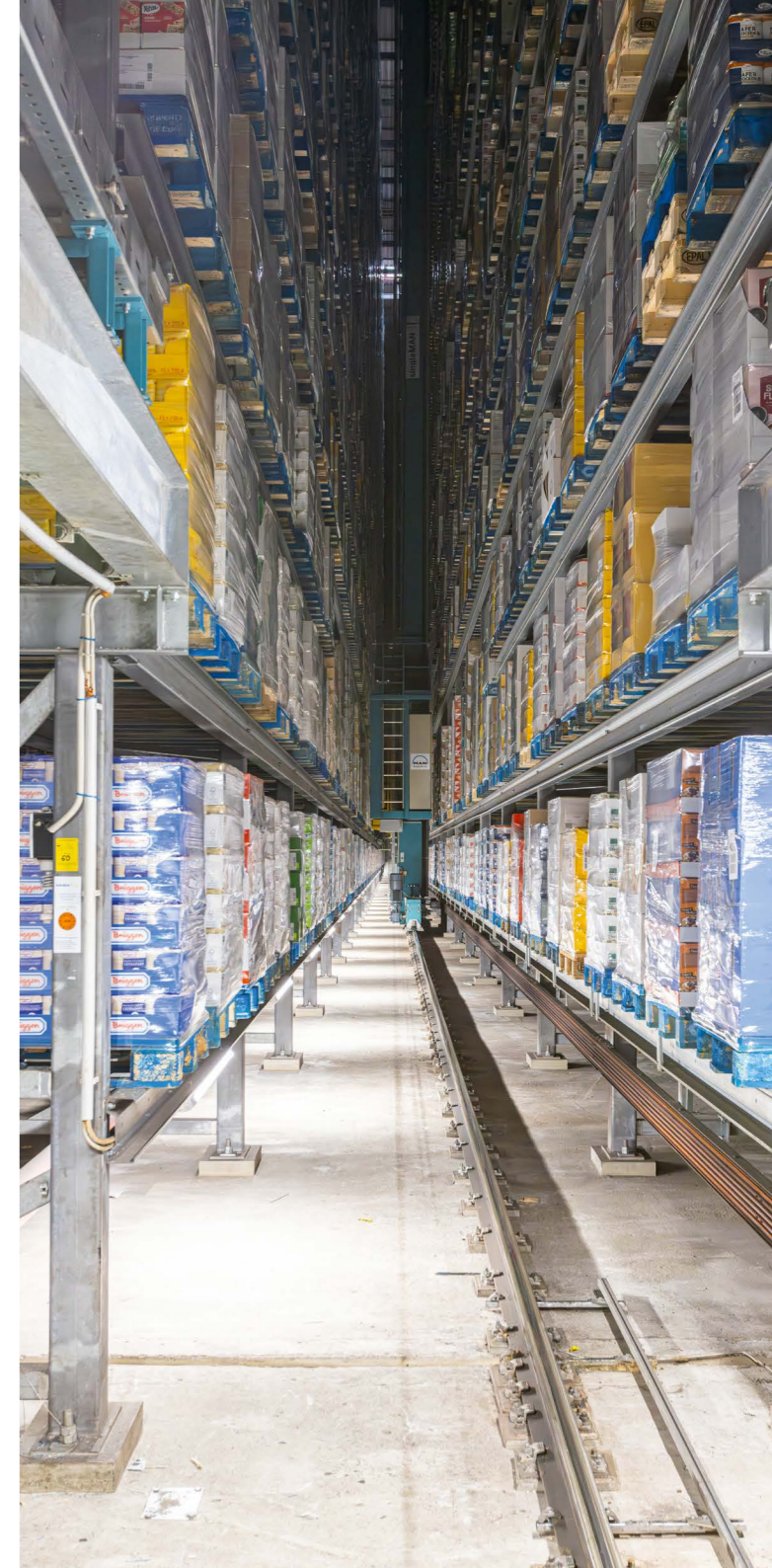


**The managing directors of H. & J. Brüggen KG
from left to right: Hanno Brüggen, Johannes Brüggen, Jochen Brüggen**

II. Requirements for suppliers / business partners

The following corporate principles are set out in this Code of Conduct and create the framework for trusting, constructive and long-term cooperation. Compliance with the principles and the conduct of business in accordance with national and international regulations and laws as well as globally recognized social and ecological standards is mandatory for all business partners and is reviewed and evaluated by the Brüggen Group to ensure compliance and prevent potential conflicts with this Code of Conduct. Our suppliers agree to be audited by the Brüggen Group to verify compliance with human rights and environmental expectations and principles. Furthermore, information that the Brüggen Group requires from business partners for its own compliance with supply chain due diligence obligations (in accordance with the national Supply Chain Due Diligence Act, hereinafter referred to as „LkSG“) must be made available. In doing so, the Brüggen Group will take appropriate account of data protection requirements.

In the event of human rights or environmental violations of the principles laid down here or in the LkSG, the supplier will be given a reasonable period of time to end the violation or – if termination is not possible – to minimize it. These remedial measures must be agreed with the Brüggen Group. If necessary, the Brüggen Group will provide appropriate support to ensure compliance



with the due diligence obligations along the supply chain. In the event of substantiated knowledge of violations of the principles by indirect suppliers, our suppliers are obliged to work with the Brüggen Group to establish appropriate preventive measures with the perpetrator. A breach of the aforementioned principles may give rise to the reassessment of a business relationship.



II.1 Human rights

A human rights risk is a situation in which there is a sufficient probability of a violation of one of the following prohibitions due to factual circumstances:

a. Violation of the ban on child labour

Child labour is strictly prohibited during all phases of production. Our business partners are expressly requested to follow the guidelines of the International Labour Organisation (ILO) with regard to the minimum age for the employment of children. According to these guidelines, the minimum age should not be lower than the age up to which compulsory education is compulsory under the applicable labour laws and regulations, and under no circumstances should it be lower than 15 years.

If children are employed, it is the duty of the business partner to document this and ensure that the children are given the opportunity to attend school. Furthermore, it is not permitted to employ persons under the age of 18 for work that could endanger their health, safety or moral development, the so-called worst form of child labour. Our business partners must implement a standardized recruitment and hiring process, including a robust age verification process. If we identify child labour at a direct supplier, the supplier will be given a reasonable deadline to abolish it. If the supplier fails to comply with its obligation to eliminate child labour in its operations within the set deadline, the business relationship will be terminated.



b. Violation of the ban on forced labour and all forms of slavery

It is expressly forbidden to use any form of forced labour, slave labour or similar practices. All employment must be on a voluntary basis, without the use of penalties or pressure. Employees must be able to terminate their work or employment relationship at any time without fear of consequences. Furthermore, any form of unacceptable treatment of workers is strictly prohibited, including psychological stress, sexual harassment and humiliation.

c. Recruitment of migrant and temporary workers

If migrant and / or temporary workers are emp-

loyed directly or indirectly (e.g. via subcontractors and employment agencies) by our direct business partners, we would like to point out that there is an obligation to endeavour to transfer these employees to a permanent employment relationship.

No recruitment fees or other fees as defined in the ILO's¹ Fair Recruitment Directive² may be charged, even if national legislation allows otherwise. Our direct business partners must recognize and implement the requirements of the ILO Directive.

¹International Labour Organization

² Guideline: [wcms_536755.pdf\(ilo.org\)](https://www.ilo.org/wcmsp5/pdf/wcms_536755.pdf?lang=en)



d. Disregard for occupational health and safety and work-related health hazards

A safe and hygienic working environment is ensured on the basis of applicable national and international standards and laws. This is achieved by developing and implementing suitable occupational safety systems that take the necessary precautions against potential accidents and damage to health in connection with work activities. Measures to prevent excessive physical or mental exhaustion must also be implemented. In addition, employees are regularly informed and trained about applicable health and safety standards and measures. The provision of a sufficient supply of drinking water and clean sanitary facilities for employees must be guaranteed.

e. Disregard for freedom of association, freedom of unionization and the right to collective bargaining

All employees have the right to freedom of association and collective bargaining. If this is not enshrined in national legislation, the relevant ILO principles apply. Employees have the right to join or form trade unions and to support collective bargaining. Discrimination against employees on the basis of founding, joining or being a member of such an organization is not permitted. Employees' representatives shall be granted free access to the workplaces of their members to ensure that they can exercise their rights in a lawful and peaceful manner.



f. Unequal treatment in employment

Any form of discrimination is unacceptable; in accordance with Article 3 of the German Basic Law and Article 21 of the Charter of Fundamental Rights of the European Union, all employees must not be disadvantaged or favoured because of their gender, origin, race, language, country of origin, faith, religious or political beliefs or because of their disability. This applies to the application phase and the period of employment. The presentation and dissemination of pornographic content is also not tolerated. The personal rights and privacy of each individual are respected.

g. Withholding an appropriate wage

The appropriateness of remuneration must be guaranteed by the legally binding minimum wages and social benefits. In addition, the remuneration standards resulting from collective bargaining must be complied with. These measures are intended to ensure appropriate remuneration to enable employees and their families to live in dignity. Payment is made at regular intervals, but at least monthly. Deductions from wages as a disciplinary measure are excluded. Employees are granted statutory social benefits. The maximum number of hours to be worked is based on national law, industry standards and collective



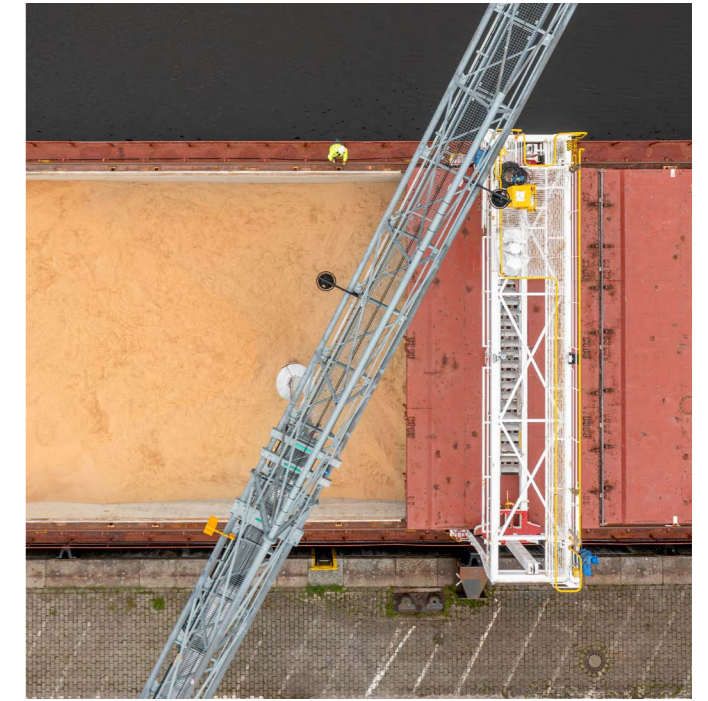
agreements and must be checked for ILO conformity and applied. 48 hours per week may not be regularly exceeded. Overtime is in accordance with national legislation and is therefore voluntary and considered an exception. It is performed in consideration of the rest period to be observed. Employees are compensated for overtime. Every employee is entitled to one day off per week.

h. Unlawful eviction and causing harmful pollution of soil, air, water

The supplier must not violate legal property rights and deprive land, forests or waters whose use is important for the livelihood of people. Any harmful effects on soil, water and air, noise pollution and excessive water consumption must be avoided, especially if they jeopardize the health of people, significantly impair natural resources for food production or hinder people's access to clean drinking water or sanitary facilities.

i. Use of security forces in violation of human rights

The business partner respects the prohibition on commissioning or using private or public security services to protect the company's project if, due to a lack of instruction or control on the part of the company, the deployment of security forces causes injury to life or limb, violates the prohibition of torture or other cruel, inhuman or degrading treatment and/or impairs the freedom of association and union.



j. Anti-corruption & anti-bribery

The highest standards of integrity and ethics must be maintained in all business activities. The business partner must pursue a strict zero-tolerance policy towards any form of bribery, corruption, extortion and embezzlement. When interacting with business partners such as customers, suppliers and government institutions, a clear separation between the interests of the company and the personal interests of employees on both sides must be ensured. Actions and (purchasing) decisions are made independently of inappropriate influences and personal motives.



II.II Environmental protection

National and international legislation and environmental standards form the basis for a sustainable and resource-conserving economy. The aim is to promote environmental awareness and sustainability endeavours. A conscious use of resources is sought in order to minimize environmental impact. Air emissions and the disposal of waste, chemicals and waste water comply with legislation and applicable guidelines. The business partner shall ensure that all necessary environmental licenses are available, kept up to date and implemented in its company. It is necessary to minimize the consumption of resources during production processes and to reduce or avoid the generation of any type of waste, including water and energy. This can be done both directly at the point of origin and by applying various methods and measures, such as adapting production and maintenance procedures, optimizing operational processes, using alternative materials, saving resources, recycling or reusing materials.

a. Handling waste and hazardous substances such as mercury

The business partner uses a structured method to identify, handle, reduce and responsibly dispose of or recycle solid waste. The bans on the export of hazardous waste in accordance with the Basel Convention of 22 March 1989, as amended, are strictly adhered to. Chemicals or other substances that could pose a risk if relea-

sed into the environment are recognized and treated accordingly to ensure safety during all processes such as storage, transport, use, recycling, reuse and disposal. Mercury is used in accordance with the provisions of the Minamata Convention of 10 October 2013, and persistent organic pollutants are treated in accordance with the Stockholm Convention of 23 May 2001, as amended.

b. Dealing with energy consumption/ efficiency

It is necessary to monitor energy consumption and document it accordingly. Economic solutions should be sought to increase the efficiency of energy utilization and reduce energy consumption.

II.III Ethical principles

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





III. Compliance and implementation

In order to fulfil our social responsibility, employees and business partners are obliged to observe this Code of Conduct and comply with the principles set out in it. CSR training is offered within the Brüggén Group and we expect our business partners to communicate the contents of this Code of Conduct to their employees. If questions of understanding or interpretation arise, Brüggén employees or business partners can get in touch with the relevant contact person within the Brüggén Group. Support can also be requested here in the event of implementation difficulties. The open-door principle is an important principle of our corporate culture. Brüggén reserves the right to carry out audits to ensure that business partners comply with the specified requirements. Any violation of the Code of Conduct may lead to the termination of the business relationship. We expect our business partners to resolve or communicate any problems identified promptly so that a solution can be worked out together if necessary.

IV. Reporting violations

In the event of violations of the principles of this Code of Conduct, information can currently be provided as follows:

Internal:

Use of the anonymous reporting system via B365

External:

[Brüggén Whistleblowing system \(office.com\)](#)

V. Entry into force

This Code of Conduct was implemented in March 2024 and will be mandatory from this date.

This current version supersedes all previous versions of this Code of Conduct.



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