



Bitburger Code of Conduct for Trading Partners **version 02 – October 2024**

As a quality- and value-conscious, medium-sized family-owned company, Bitburger Braugruppe GmbH and its affiliates (collectively “Bitburger”) attach importance to responsible, long-term value creation and compliance with all national and international legal provisions. In its procurement activities, Bitburger also pays heed to social and environmental factors, such as human rights, working conditions, and environmental protection, in addition to procedural, financial, and technical criteria. Accordingly, when procuring raw materials, goods, and services, Bitburger requires of its trading partners that they have sustainable procedures in place for ensuring compliance with environmental protection regulations, fair treatment of the workforce, and observance of occupational safety and health regulations.

Moreover, Bitburger pays heed to the prevention of corruption and requires of its trading partners that they conduct themselves correctly in business. In addition to complying with the provisions of the law on cartels and competition, this also particularly includes observance of the regulations relating to responsible corporate governance and the provisions for the prevention of bribery, illegal money transfers (“money laundering”), and corruption. Therefore, Bitburger not only places its own employees under an obligation to comply with all applicable regulations and with ethical principles, but also requires of all trading partners and their affiliates (“affiliates” for the purposes of this code refers to companies in which the respective trading partner is directly or indirectly the beneficial owner of at least 50% of the share capital that holds voting rights) that they comply with all important standards in the following fields:

Basic Requirements

Bitburger requires of its trading partners that, in the execution of their activities, they conform to the respective applicable national laws, the principles of the United Nations Global Compact, and this Bitburger Code of Conduct for Trading Partners. Bitburger requires that all trading partners introduce suitable processes that ensure compliance with the applicable laws at their company and promote continuous improvement with regard to the principles and requirements of the Bitburger Code of Conduct for Trading Partners.

Bitburger requires its trading partners to conduct themselves in accordance with the German Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*, LkSG). Bitburger’s trading partners must support any measures taken by Bitburger under LkSG § 3 that pertain to, among other things, the establishment of risk management (LkSG § 4(1)), the definition of internal company responsibilities (LkSG § 4(3)), the performance of regular risk analyses (LkSG § 5), and the entrenchment of preventive measures within the activities of the company and companies subject to a controlling influence (LkSG § 6(1) and (3)) and of direct suppliers (LkSG § 6(4)).

References:

- United Nations Global Compact
- International Organization for Standardization (ISO): www.iso.org
- Supply Chain Due Diligence Act (*Lieferkettensorgfaltspflichtengesetz*)



Environmental Protection

Bitburger requires that its trading partners comply with the respective applicable national environmental laws, regulations, and standards. Moreover, Bitburger requires that the trading partners set up and apply an environmental management system commensurate with the size of their company in order to minimize environmental burdens and dangers and improve environmental protection in their day-to-day business operations.

Acting more sustainably

We expect our suppliers to act sustainably and to be aware of the potential negative impact of their business model on the environment and society and to work successively to reduce it. We call on our suppliers to implement measures to mitigate the effects of climate change and the impact on soil and water and to promote biodiversity and the circular economy. Our suppliers must not cause any harmful soil contamination, water pollution, air pollution or water consumption that demonstrably impair the basis for the preservation of biodiversity and the production of food. In case of doubt, the legally prescribed limits of the respective region or country apply.

We expect our suppliers to prioritize their efforts to minimize their negative impact on climate change and the environment. This also includes determining the emissions caused by the business model and working permanently to reduce and avoid them. Our suppliers must align the reduction of their own GHG emissions with the 1.5°C target of the Paris Climate Agreement. As part of their duty of care, our suppliers must also ensure that applicable national and international regulations and laws are observed and complied with.

Product Safety

Bitburger requires that its trading partners comply with the respective applicable regulations on product safety.

Employees and Occupational Safety and Health

Bitburger requires of its trading partners that they observe the fundamental **rights of employees** under the respective applicable national legislation. Moreover, Bitburger's trading partners must recognize and apply the core labor standards of the International Labour Organization (ILO) in compliance with the laws and legal provisions applicable to the various countries and locations. The Ethical Trading Initiative's Base Code specifies the ILO's minimum requirements for humane workplaces. Bitburger requires its trading partners to uphold the ETI Base Code. In this respect, Bitburger requires that the obligations of trading partners toward employees not be circumvented by engaging subcontractors or through other irregular forms of employment.

Bitburger requires that its trading partners prohibit the use of, and refrain from using, **child labor** at their companies; any form of exploitation of children or adolescents will not be tolerated, in accordance with ILO Convention 138.

Insofar as national laws or regulations allow children between the ages of 13 and 15 to perform light labor, this shall under no circumstances be permitted if the minor concerned is thereby prevented from complying with general school attendance requirements or participating in education, or if this employment harms their health or development.

Trading partners of Bitburger undertake to prevent any kind of **discrimination** within the meaning of ILO Convention 111 in the recruitment of employees, in the promotion of employees, or in the



provision of training or further training measures. Equal opportunity and equal treatment must be promoted. Employees must not be discriminated against on account of their gender, age, skin color, culture, ethnic origin, sexual orientation, disability, religious affiliation, religious practice, or ideology.

Trading partners of Bitburger must not allow **any forced labor** within the meaning of ILO Convention 29 at their company.

Bitburger requires that, in conformity with the applicable national legislation and ILO Conventions 87 and 98, its trading partners pay heed to employee rights to **freedom of association**, i.e., the right to form a body representing employees and to conduct collective negotiations.

Bitburger's trading partners undertake to comply with the respective national legislation relating to **remuneration** and **working hours**. In particular, this obligation shall also encompass adherence to the collective bargaining agreements concluded and to the **minimum wages** set by law.

trading partners undertake to comply with the respective applicable national legislation relating to **occupational safety and health**. Furthermore, it is expected that, within the scope of the respective international legislation, all trading partners set up and apply a health and safety management system commensurate with the size of the company (e.g., ISO 45001). This must encompass, firstly, the mitigation of actual and potential risks at work and, secondly, the training of employees on how to prevent accidents and occupational diseases optimally.

References:

- Universal Declaration of Human Rights: www.un.org/en
- Core labor standards of the International Labour Organization (ILO)
- Ethical Trading Initiative Base Code
- ISO 45001

Business Conduct

Bitburger's trading partners undertake not to tolerate any form of corruption or bribery and to ensure at their companies compliance with the conventions of the United Nations (UN) and the Organisation for Economic Co-operation and Development (OECD) relating to the combat of corruption, as well as with the relevant anti-corruption laws. In particular, all trading partners must ensure that their employees, subcontractors, and agents do not offer, promise, or grant any advantages to Bitburger employees, or third parties closely associated with them, with the aim of obtaining a contract or another form of preferential treatment in business dealings.

Bitburger requires that its trading partners do not misuse **invitations** or **gifts** for the purpose of exerting influence. Invitations or gifts may be granted to Bitburger employees, or persons closely associated with them, only if the occasion and scope concerned are appropriate, i.e., they are of low value and can be regarded as a generally accepted business practice at the given location. Equally, trading partners must not demand any inappropriate advantages from Bitburger employees.

Bitburger requires that **conflicts of interest be avoided**. Conflicts of interest, or even the appearance of conflicts of interest, with an employee's private concerns or financial interests elsewhere or other activities, including those of relatives or other close persons, must be avoided.



Bitburger requires that its trading partners promote **free and fair competition** by always conducting themselves fairly in competition and heeding the applicable laws on cartels. Trading partners must not participate in any collusion with competitors contrary to the law on cartels. Trading partners undertake to comply with the relevant statutory provisions on the prevention of **money laundering** and to not participate in money-laundering activities.

Application to the Trading Partners' Own Business Relations

Bitburger's trading partners undertake to communicate to their subcontractors and suppliers all principles and requirements defined in this document and to likewise take these into account when selecting subcontractors and suppliers. The trading partners must encourage their subcontractors and suppliers to comply with the defined standards relating to human rights, working conditions, corruption prevention, and environmental protection when performing their contractual obligations.

Compliance with the Bitburger Code of Conduct for Trading Partners

Our trading partners' compliance with the principles and requirements arising from this Bitburger Code of Conduct for Trading Partners must be regularly reviewed by the trading partners themselves. Moreover, Bitburger or third parties appointed by Bitburger may, subject to agreement with the trading partner concerned, carry out random checks commensurate with the size of the company. If there is any reason to suspect that the principles and requirements are not being heeded, Bitburger will be entitled to request information on the situation.

Any **breach** of the requirements specified in this Bitburger Code of Conduct for Trading Partners will be regarded as a material impairment of the contractual relationship between the trading partner and Bitburger. Bitburger has the right to prematurely terminate some or all contractual relations with trading partners without prior notice when they demonstrably fail to comply with this Bitburger Code of Conduct for Trading Partners, or do not attempt and implement improvement measures despite Bitburger having set them a reasonable time limit for doing so.

If contracting parties gain knowledge of major human-rights or environmental risks within the supply chain and these risks are highly likely to materialize or have already materialized, the parties must inform Bitburger about this without undue delay. Complaints or tips about breaches of this code of conduct or applicable legislation can be reported to Bitburger by employees at any time, including anonymously, by using the reporting tool mentioned below. All trading partners guarantee to inform all employees about this **complaints mechanism** and enable them easy access to it. Disciplinary measures must not be taken against individuals who report complaints. The complaints mechanism can be utilized via the link of our website: <https://www.bitburger-braugruppe.de/unternehmen/compliance>

Trading Partner / Company name

Signature and Date

Company Stamp or Company name and address

October 2024