

# **Social and Ethical Guidelines**

#### **Preamble**

Our company is committed to the following ethical and social principles that guide our business activities and underpin our integrity. They serve as a benchmark for our partnerships with employees, suppliers, customers and anyone with whom we conduct a business relationship. They apply universally to the entire company group (hereinafter referred to as Lebensbaum), i.e. Pure Taste Group GmbH & Co. KG and its subsidiaries, Ulrich Walter GmbH, Niehoffs Kaffeerösterei GmbH and BioLogX GmbH.

These **Social and Ethical Guidelines** supplement our company policy and are subdivided into the following sections:

- General ethical and social principles for conduct within the company and towards our business partners (points 1 to 8 in particular)
- Specific ethical and social principles at our facilities and for conduct towards our employees (points 9 to 18 in particular)
- Ethical and social principles in our procurement activities and for conduct towards our suppliers (points 19 to 23 in particular)

Further guidelines and works agreements of the company group and, where applicable, its subsidiaries also apply. These guidelines cannot provide answers to all questions and do not relieve individuals of their responsibility to act and reason independently and prudently in the best interests of the company. These principles must be followed at all times. Serious or repeat violations may lead to repercussions culminating in termination of employment or the business relationship. Instructions from supervisors that differ from these guidelines are not in accordance with the company's intentions.

All principles apply to every Lebensbaum employee and to the aforementioned companies, hereinafter collectively referred to as "we". In the interest of legibility and gender neutrality, we avoid using gender-specific formulations (he or she, chairman or chairwoman, etc.) in favour of gender-neutral terms (they, chairperson, etc.). Where a gender-neutral term is not available, the gender-specific formulation shall apply equally to everyone, regardless of gender.

General ethical and social principles for conduct within the company and towards our business partners

#### 1. Responsibility, respect and dialogue

We take responsibility for our actions and their consequences.

Along our value chains and throughout our product life cycles, we ensure a respectful approach to nature and people, minimise risk and exercise our duty of care in verifying this. We take the views, experience and needs of our stakeholders into account by engaging with them in dialogue, monitoring and participation processes.

## 2. Fairness, openness, honesty and integrity – zero tolerance of corruption

Our actions towards employees, business partners and other people and organisations associated with us are based on the principles of fairness, openness, honesty and integrity. Any form of unfair or dishonest practice conflicts with this.

We do not engage in any form of corruption, extortion, embezzlement or bribery, nor do we tolerate these in others.

We do not offer or accept unfair incentives or gifts, financial or otherwise.

All employees are required to contact their supervisor or Compliance Officer if they suspect misconduct in any of the aforementioned areas.

# 3. Products, manufacturing and marketing: honesty and transparency

Lebensbaum takes an honest and transparent approach to the production of organic products.

This means that our products comply with Lebensbaum's purity principle:

whatever the product, whether tea, coffee or spices, we never add flavourings, additives or aromas. We declare all ingredients, providing complete and comprehensible information that goes beyond what is required by law.

We design our packaging to be as environmentally friendly and sustainable as possible without compromising product protection.

We conduct our sales and advertising activities in an honest, transparent and fair manner.

# 4. Transparent corporate activity

We are strongly committed to transparency in our business activities. To this end, we collect all necessary information that can be obtained through reasonable effort.

We use this information to evaluate our performance and impact and to adapt our activities and structures wherever necessary.

Within the context of our public reporting, we disclose this information in accordance with applicable regulations as well as industry and international standards and, in doing so, strive to go beyond the minimum legal requirements and what is customary in the industry. Falsification of such information and fraudulent actions in the supply chain or towards customers fundamentally contradict our values and are not tolerated under any circumstances.

#### 5. Responsible handling of data

Reasonable care is taken whenever the data of employees, business partners, customers, consumers or others need to be collected, used or processed. This involves consideration for the personal rights and interests of the persons and organisations concerned as well as compliance with legal provisions and requirements in Germany with regard to data protection and information security.

#### 6. Compliance with laws and international standards

National laws, prevailing international standards and the principles set out in these guidelines constitute for us minimum requirements for responsible business practices. The non-negotiable basis for all our business activities and relationships includes the implementation of human rights due diligence and compliance with the United Nations Guiding Principles on Business and Human Rights, as well as compliance with core labour standards and other relevant standards of the International Labour Organization (ILO), the Principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

#### 7. Advice and assistance

We seek to create a culture in which questions are welcome and everyone feels supported. Anyone in doubt about correct conduct is encouraged to contact their supervisor, Human Resources department, works council or Compliance Officer.

Managers are responsible for ensuring that all employees receive the advice and assistance needed to comply with our guidelines.

#### 8. Complaint handling

We deal with complaints openly and constructively. Anyone, both internal and external, may file a complaint via our whistleblower channel. Reports of violations of these **Social and Ethical Guidelines** and other complaints are treated confidentially and, where requested, anonymously.

We ensure that reports and complaints do not result in discrimination or disadvantage and that each report and complaint is pursued.

# Specific ethical and social principles at our facilities and for conduct towards our employees

The definition of employees for the purposes of these guidelines also includes trainees, temporary agency workers, interns and other temporary staff and casual workers. These guidelines also apply in particular to the conduct of employees towards one another.

# 9. Fair employment and respectful dealings

Our employees are partners in our company and value creation process. We treat them with respect and place them on an equal footing. This is based on good employment conditions and respectful interactions.

Precarious employment is not tolerated. We only resort to temporary agency workers where unavoidable. To do this, we cooperate with temporary employment agencies who guarantee fair terms of employment.

# 10. Regular employment on a voluntary and non-coercive basis

Forced labour is never tolerated or used.

Employment within our company is based on written employment contracts concluded

voluntarily.

No one is forced to work under threat of punishment or sanctions. Employees are not required to leave their identification documents or deposit anything else with the company. The company keeps employment contracts on file and these can be viewed at any time. As a minimum these detail the job title, scope of work and working hours, as well as the level of pay.

## 11. No child labour and special protection for minors

We comply with national legal provisions on minimum age and special protection for young workers.

Employees under the age of 18 are not permitted to work night shifts or perform duties that might constitute a danger to their health, safety, development or integrity. Exploitative child labour is never tolerated or used.

# 12. Freedom of association and right to collective bargaining

All employees have the right and freedom to assemble, organise and join trade unions of their choice to protect their interests and for collective bargaining, and are not obstructed or sanctioned by the company for this.

We work together with elected employee representatives on a constructive and respectful basis. These representatives are respected and are not prevented from performing their duties nor disadvantaged or discriminated against as a result of these duties.

## 13. Non-discrimination and equal opportunities

Our behaviour towards one another is based on respect and tolerance regardless of skin colour, ethnic origin, gender, religion or ideology, disability, age, pregnancy, family circumstances or sexual identity.

Our interactions are free of verbal, physical, psychological and sexual harassment or violence

Discrimination and unequal treatment on the basis of the above as well as any bullying are not tolerated.

Employees are remunerated on the basis of individual skill and qualifications in accordance with the principle of "equal pay for equal work".

#### 14. Health and safety

We commit to complying with national statutory occupational safety standards and take additional precautions to minimise the risk of work-related physical and mental stress and accidents of all kinds.

We take whatever steps we can to promote the health of our employees.

# 15. Wages, salaries and benefits for employees

Our wages and salaries exceed the minimum wages applicable and are at least as high as the wages and salaries customary in the particular industry and region.

Furthermore, we offer additional social benefits over and above minimum legal

requirements.

# 16. Working time

Our working time guidelines comply with national legal requirements and ILO Conventions. They are defined in writing in employment contracts and works agreements.

We take care to ensure sufficient consecutive time off for rest.

Overtime is voluntary, infrequent, offset by time off in lieu or financial remuneration and limited by the company.

Accordingly, the regular working week, including overtime, must not exceed 48 hours. The number of paid annual leave days exceeds legal requirements.

# 17. Employee development, training and further education

We care about the development and professional training of our employees. We are committed to taking on trainees and supporting our employees in achieving higher qualifications where relevant. We promote the (further) personal development of our employees through regular feedback discussions and professional training. We conduct compulsory training required by law and/or ourselves to ensure the necessary qualifications and to keep expert knowledge up to date.

#### 18. Work-life balance

A work-life balance is fundamental to the well-being of our employees. This is why we encourage proactive measures to support dynamic and flexible working and living arrangements. This enables, among other things, equal opportunities for women and men, age-appropriate career options and family-friendly work organisation models wherever the nature of the work and departmental structures allow.

Ethical and social principles in our procurement activities and for conduct towards our suppliers

#### 19. Long-term, fair and development-focused supplier partnerships

We strive for close, long-term and fair partnerships with all our suppliers. We aim to contribute to the development of our suppliers through our business activities. Where suppliers or their employees are socially or economically disadvantaged, we want to contribute to improving the social and economic situation of our suppliers and the people who work for them through long-term and fair cooperation. This responsibility also expressly includes the goal of agreeing fair and reasonable prices with our suppliers to ensure their viability. Price agreements are based on transparent pricing mechanisms agreed on equal terms. Suppliers are supported through suitable funding instruments where necessary.

#### 20. Risk-based supplier management

Cooperation with suppliers is based on our Code of Conduct, which is agreed in writing and must be adhered to by our suppliers and, where relevant, their sub-suppliers. Its principles are founded on the same international norms and standards that underpin these **Social and Ethical Guidelines** (see point 6).

We check each supplier based on risk, collect all the necessary data for this and have the requisite verifications submitted to us.

In terms of compliance with ethical and social standards, we request additional evidence from suppliers in countries classified as high risk or commission regular social and environmental audits at their facilities.

# 21. Socially responsible organic farming

We only use high-quality, strictly controlled organic raw materials for our products, which are produced for us using socially responsible organic farming methods. We demand and promote the protection of soil, water, biodiversity, air and climate, because this is the only way to preserve our environmental resources and produce healthy food.

## 22. Purchasing at source

We prefer to procure our raw materials directly from source. Wherever we cooperate with processors or partners to source raw materials, we work with those who share our principles, promote close and direct partnerships with their suppliers and require their suppliers to comply with our Code of Conduct.

# 23. Violations, measures, sanctions

If a supplier fails to meet our requirements, we require them to take appropriate measures which we then document. In the event of serious or repeat violations, we take appropriate action which may culminate in termination of the business relationship.

As a company, we declare that we comply with the principles set out here and exercise our corresponding duty of care. Should you have any comments or questions concerning these guidelines, please contact our Compliance Management team at <a href="mailto:compliance@lebensbaum.de">compliance@lebensbaum.de</a>. To report a violation, also anonymously if preferred, please use our whistleblower channel at <a href="https://whistleblowersoftware.com/secure/Lebensbaum">https://whistleblowersoftware.com/secure/Lebensbaum</a>.