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BERENTZEN-GRUPPE  
SUPPLIER  
CODE OF CONDUCT



BERENTZEN-GRUPPE  
Thirst for life



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# Introduction and objectives of the Supplier Code of Conduct

## (1) Introduction

The Berentzen Group<sup>1)</sup> is a broad-based beverage company operating in the following three segments: Spirits, Non-alcoholic Beverages and Fresh Juice Systems. The Berentzen Group is one of the oldest producers of spirits in Germany with a corporate history going back over 250 years. Today, it has a presence in more than 60 countries around the world with well-known brands like Berentzen and Puschkin and attractively priced private label products. In its Non-alcoholic Beverages segment, the corporate group produces mineral waters, carbonated and non-carbonated soft drinks under its own brands and also boasts more than 50 years of experience in the franchise business for soft drinks, currently acting as franchisee for the Sinalco brand. In addition, the Berentzen Group markets innovative fresh juice systems under the Citrocasa brand in its third segment, thus serving the fast-growing market for modern, health-oriented drinks. The Berentzen-Gruppe Aktiengesellschaft share (ISIN DE0005201602) is listed on the regulated market (General Standard) of the Frankfurt Stock Exchange.

Corporate responsibility in terms of economy, ecology and society forms the basis for our actions. This responsibility should be met consistently by all participants in the value added chain for products of companies in the Berentzen Group. This Supplier Code of Conduct defines the minimum requirements for suppliers to the Berentzen Group.

<sup>1)</sup> The Berentzen Group includes Berentzen-Gruppe Aktiengesellschaft and its subsidiaries, each of which is individually or jointly also referred to as "company" or "companies".

## (2) Objectives

With this Supplier Code of Conduct, the objective of the Berentzen Group is to create a common understanding with regard to appropriate living and working conditions for employees<sup>2)</sup> that is followed by all suppliers to the Berentzen Group and their staff.

Our Supplier Code of Conduct is in line with the respective applicable versions of the ETI (Ethical Trading Initiative) Base Code, the principles of the ILO (International Labour Organisation) as well as The Ten Principles of the UN Global Compact. It forms the basis for long-term and sustainable business relationships.

The basis for compliance with our Supplier Code of Conduct is that it is communicated regularly to our suppliers.

<sup>2)</sup> For better readability in particular, this Supplier Code of Conduct does not use gender-neutral distinctions. In accordance with the principle of equal treatment, any terms used refer to all genders; this also applies with respect to all other gender-specific terms used.

## Scope

The Supplier Code of Conduct applies to all suppliers to the Berentzen Group. This also includes all third parties that work regularly and to a significant extent either for the Berentzen Group, on its behalf or with it or are involved in the value added chain for products or the provision of services for the Berentzen Group, e.g. business partners, subcontractors, minority shareholders, sales representatives and freelancers.

## Our supplier principles

### (1) Employment is freely chosen

(ILO Conventions 29 and 105, ETI Base Code point 1, UN Global Compact point 4)

All forms of forced labour are strictly prohibited. Employees cannot be forced to work or to enter into an employment relationship through force or threat (e.g. bonded labour or slavery). This also includes a prohibition on forcing employees to continue to work by withholding their wage, benefits, property or documents.

### (2) Freedom of association

(ILO Conventions 87 and 98, ETI Base Code point 2, UN Global Compact point 3)

The employees are entitled to band together to protect or represent their interests. To do this, they can form or join an association. They also have the right to collective bargaining. Where this is restricted under national law, the employer should not hinder the development of parallel means for independent and free association and bargaining.

### (3) Working conditions are safe and hygienic

(ETI Base Code point 3)

The working environment must ensure the health and safety of the employees. To ensure prevention of accidents and damage to health at work, industrial health and safety measures and procedures must be established. The employees must be informed at regular intervals of these measures and procedures as well as of the relevant health and safety provisions and must be trained, e.g. by means of industrial safety drills.

It must also be ensured that the workplace and working environment including common areas used as well as employee accommodation meet the relevant hygiene standards.

### (4) Child labour shall not be used

(ILO Convention 138, ETI Base Code point 4, UN Global Compact point 5)

Child labour is strictly prohibited. If young people are employed, the entry age for work cannot be before the end of their general compulsory schooling. In any event, however, the minimum age is at least 15 years, unless exceptions are granted pursuant to ILO Conventions. There is of course a duty to comply with the respective national laws and regulations on the protection of children and young people.

## (5) Living wages are paid

(ETI Base Code point 5)

Employees have the right to receive their wage regularly, in full and on time. They must receive appropriate pay for their work. At a minimum, wages and benefits paid for a standard working week must meet national legal standards, collectively bargained standards and minimum industry standards. The wage paid should be sufficient to cover the cost of living. All employees are entitled in full to the benefits prescribed by national law and in collective agreements (e.g. insurance contributions, paid vacation, allowances, payment of overtime). It is not permissible to withhold part or all of the wage as a disciplinary measure. Deductions from wages not specifically provided for by national law are not permitted without the express permission of the employees.

## (6) Working hours are not excessive and regular employment is provided

(ETI Base Code points 6 and 8)

The maximum number of working hours, both per day and per week, must comply with the national laws and industry standards. Employees must generally not be asked to work more than 48 hours per week, or not more than 60 hours including overtime. Overtime should be voluntary and must be paid additionally in line with national law. On average, employees must be granted at least one day off every 7 days.

Employment contracts must be concluded with the employees in line with national law.



## (7) No discrimination is practised

(ILO Convention 111, ETI Base Code point 7, UN Global Compact point 6)

Employees cannot be subject to any discrimination based on ethnicity or nationality, caste, religion, age, physical or intellectual disability, gender, marital status, sexual orientation, religious or political affiliation, other personal characteristics or membership in employee organisations.

## (8) No harsh or inhumane treatment is allowed

(ETI Base Code point 9, UN Global Compact points 1 and 2)

All employees must be treated with dignity and respect. Physical discipline, sexual, physical or psychological harassment and all other forms of abuse or intimidation are prohibited in all circumstances.

## (9) Environmental concerns

(UN Global Compact points 7 to 9)

Suppliers must adhere to the respective national environmental protection laws as well as to corresponding directives. In any event, harm to the environment should be avoided and/or reduced where possible, e.g. by the use of environmentally friendly technologies. Suppliers must work toward continuously improving the protection of the environment, optimising energy consumption and protecting natural resources.

## (10) No corruption

(UN Global Compact point 10)

We also expect our suppliers to always behave in an ethically correct and legally compliant way. All forms of corruption are strictly prohibited. In particular, the term “corruption” includes extortion, bribery and accepting and granting undue advantages.

It is not permissible to request and accept or to offer and grant personal favours in order to influence decisions, obtain business advantages or bring about or speed up certain actions, tolerance or acts of omission.

This prohibition relates not only to direct and indirect financial incentives, but also to all forms of allowances or inducements that are either impermissible – in particular in accordance with the Code of Conduct of the Berentzen Group or the relevant compliance regulations of the recipient – or that exceed an appropriate and customary scope or could call into question their objectivity or independence.

In the case of all inducements, regardless of whether these are received or granted, it must be ensured that these are permissible and cannot rationally be considered corrupt. Even any appearance of bad faith or inappropriateness or extraneous considerations must be avoided.

Inducements also include gifts, entertainment and invitations. The following applies notwithstanding the relevant compliance regulations of the respective recipient:

Suppliers and/or their employees are permitted to occasionally receive and grant smaller gifts of a business nature provided that these do not exceed a customary and appropriate scope and in total do not exceed a net amount of EUR 35 per person per year.

Gifts of a higher value that correspond to customary local ideas of politeness and hospitality and the omission or refusal of which would run counter to local values may be accepted or granted by suppliers and/or their employees if this has already been approved in accordance with the relevant guidelines of the Berentzen Group by the manager responsible.

However, the receipt or granting of cash or comparable inducements as a gift is always prohibited.

It is also permitted to occasionally accept or offer entertainment and invitations to events of a business nature provided that these do not exceed a customary and appropriate scope in line with local standards.

## (11) Competition and anti-trust law

The principles of the market economy and of fair competition form the basis for the corporate actions of the Berentzen Group.

As such, we also expect our suppliers to observe the respective national and international provisions on competition and anti-trust law.

## Compliance with and implementation of the Supplier Code of Conduct

This Supplier Code of Conduct defines the minimum requirements for suppliers to the Berentzen Group. The suppliers agree to comply with the minimum standards defined in the Supplier Code of Conduct and with the respective national regulations, laws, minimum industry standards and other relevant legal provisions. These take precedence in the event of any conflict with the Supplier Code of Conduct. In the case of employee leasing, it must be ensured that the corresponding service provider also meets these requirements.

The supplier must verifiably use suitable measures to ensure and regularly assess compliance with the minimum standards defined in the Supplier Code of Conduct. The employees must be informed regularly of the rights resulting from the Supplier Code of Conduct. Implementation of the principles described in the Supplier Code of Conduct can be verified and documented by carrying out independent social audits. Measures for improvement can be derived as necessary.

In the event of non-compliance with the Supplier Code of Conduct, the supplier should introduce measures for improvement in a timely manner. We will provide adequate time and support for this. If the Berentzen Group is aware of specific breaches of the Supplier Code of Conduct, it reserves the right to end the business relationship or specifically to have a social audit carried out at the supplier by third parties.

Supply relationships with new suppliers only result when these agree to comply with this Supplier Code of Conduct or the potential supplier has already verifiably introduced standards or its own code based on established standards or is actively and verifiably working on introducing such.

## Entry into force of and amendments to the Supplier Code of Conduct

The Supplier Code of Conduct enters into force on October 15, 2017 and is supplemented by the Code of Conduct and the Marketing Code. All of the Codes can be accessed on the corporate website of the Berentzen Group ([www.berentzen-gruppe.de/en/](http://www.berentzen-gruppe.de/en/)).

The Supplier Code of Conduct is subject to an annual review process by top-level management. Amendments, supplements or updates to this Supplier Code of Conduct are at the sole and exclusive discretion of the Berentzen Group.

## Independent agency and reporting breaches

In the case of breaches or suspected breaches of the principles contained herein, information can be provided to the external agency set up for this purpose (also anonymously). This agency has been appointed by the Executive Board of Berentzen-Gruppe Aktiengesellschaft to record this information. All information will be treated confidentially.

The contact details for the external agency are as follows:

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