

# PEPPERMINT



## Policy Statement Peppermint Group

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# Vorwort



Dear readers,

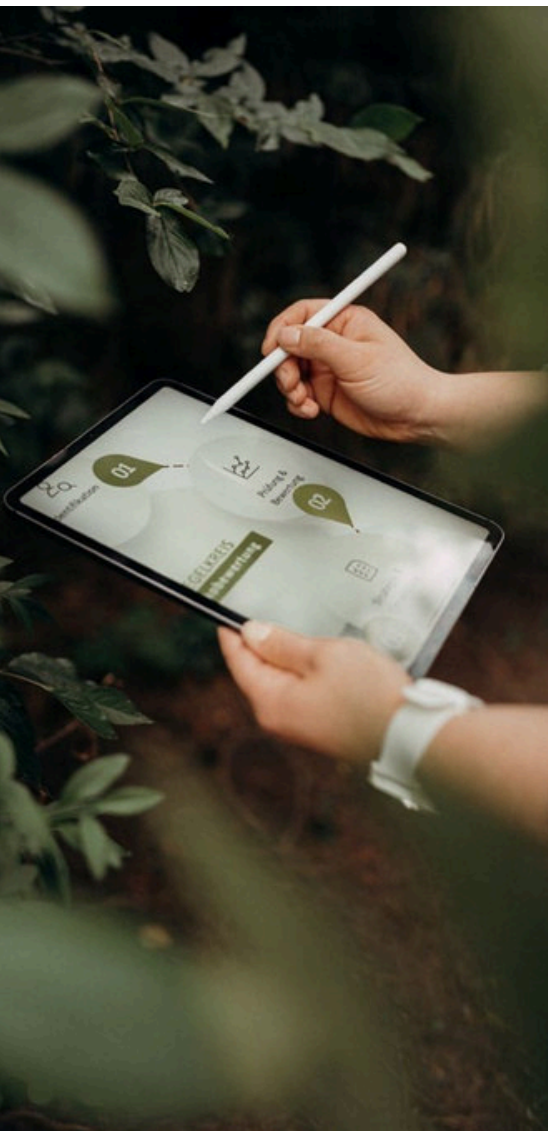
For us, sustainability means creating lasting value: for customers, employees and suppliers as well as for all other business partners and society as a whole.

Respect for internationally recognised human rights and social and environmental standards is a top priority for Peppermint and a fundamental component of responsible corporate governance. Our aim is to ensure that human rights are not only adhered to by our employees, but also by our business partners and suppliers.

With the following declaration of principles for social responsibility and human rights, we are once again making a strong and binding commitment to these values. The declaration reaffirms our dedication to respecting human rights as set out in:

- the International Bill of Human Rights,
- the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights.

This declaration supplements and concretises our Code of Conduct with regard to human rights and good working conditions. It will be the authoritative document.



We have further developed our supply chain management system in order to monitor compliance with human rights in the supply chain. The existing social compliance approach has been expanded into a due diligence approach. This approach is our framework for putting this declaration of principles into practice. It is designed to recognise and avoid risks and potentially negative impacts of our business activities on human rights at an early stage. As a risk-based approach, the supply chain management system is applied both in our supply chains and in our controlled business units.

We are convinced that long-term success can only be achieved if we fulfil our corporate responsibility for respect for human rights, both locally and globally. This declaration of principles constitutes another important step in this direction. Each and every one of us is called upon to put this declaration of principles into practice and move our company towards a sustainable future in every respect. Thank you for your support!

**Ingeborg Neumann**  
Founder & Managing Partner

**Marcus Baumbach**  
Managing Partner

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## International standards and guidelines

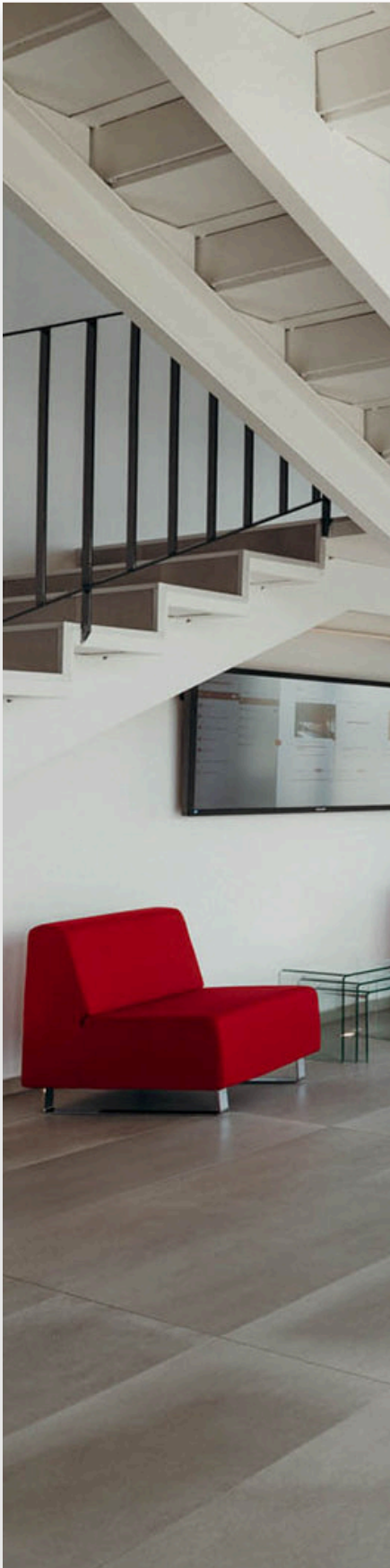
Respecting human rights, protecting our environment and acting ethically are key concerns for the Peppermint Group. We are convinced that sustainable business can only be achieved by acting ethically and with integrity.

The following standards and guidelines govern our actions and co-operation with our business partners:

- Universal Declaration of Human Rights
- the UN Guiding Principles on Business and Human Rights
- the United Nations Sustainable Development Goals
- the principles of the UN Global Compact
- the conventions and protocols of the International Labour Organization (ILO) on labour and social standards
- the OECD Guidelines for Multinational Enterprises
- Washington Convention on International Trade in Endangered Species (CITES)
- Biodiversity (Cartagena and Nagoya Protocols)







## Guidelines and directives for employees, suppliers and business partners

In order to fulfil our aim of compliance with human rights and environmental standards, the Peppermint Group's guidelines and directives supplement the recognised standards. These provide our employees, suppliers and business partners with a binding framework for action. These include:

- The PepGuideline Sustainability is a binding guideline for all business partners, employees and managers. It aims to reconcile economic, ecological and social aspects in the best possible way.
- The Code of Conduct (PepGuideline Compliance) is binding for all employees and also regulates how we interact with each other.
- The 'Code of Conduct for Suppliers and Business Partners' regulates the principles and requirements regarding compliance with laws, human rights and environmental standards in supply chains.

## Responsibilities

Responsibility for the content of the policy statement lies with the company management. In operational terms, sustainability activities are implemented by the responsible employees in the areas of sustainability management and purchasing. They focus on the implementation of human rights and environmental due diligence obligations along the supply chain and on monitoring suppliers and other business partners.

# Risk analysis - Due-Diligence-Prozess

The Peppermint Group is operating worldwide, with various locations in Germany and Europe. Our supply chain is as global as it is ramified, and extremely complex.

We are aware that our activities might lead to negative impact on the environment and people in the supply chain. Therefore, we endeavour to design supply chains responsibly and reduce risks as much as possible.

## Risk management

We have established a risk management system that we use to assess business risks. These include human and environmental risks in our own business area and in the supply chain. The risk management system continuously analyses the potential risks. Based on these results, measures are taken to remedy, prevent and minimise risks.

In the course of risk management, relevant risks are identified, assessed according to their probability of occurrence and significance, and assigned to specific areas and responsible parties.

Risk analysis is supported by an IT tool. The first step is to determine the risks related to our suppliers' industry and country, known as the gross country risk.

The exact data sources and the precise description of the composition of the scores are explained on 'Risk analysis explained' ([retraced.com](https://retraced.com)).

The following risks are included in the risk analysis:

1. Child labour
2. Sexual harassment and sexual and gender-based violence in the workplace
3. Forced labour and slavery
4. Working hours
5. Health and safety in the workplace
6. Trade unions and collective bargaining
7. Wages
8. Hazardous chemicals
9. Water
10. Effects of climate change
11. Air pollution
12. Waste
13. Biodiversity
14. Animal welfare
15. Physical exposure
16. Irresponsible business practices
17. Use of security forces
18. Forced evictions
19. Land rights
20. Discrimination in employment
21. Bribery and corruption

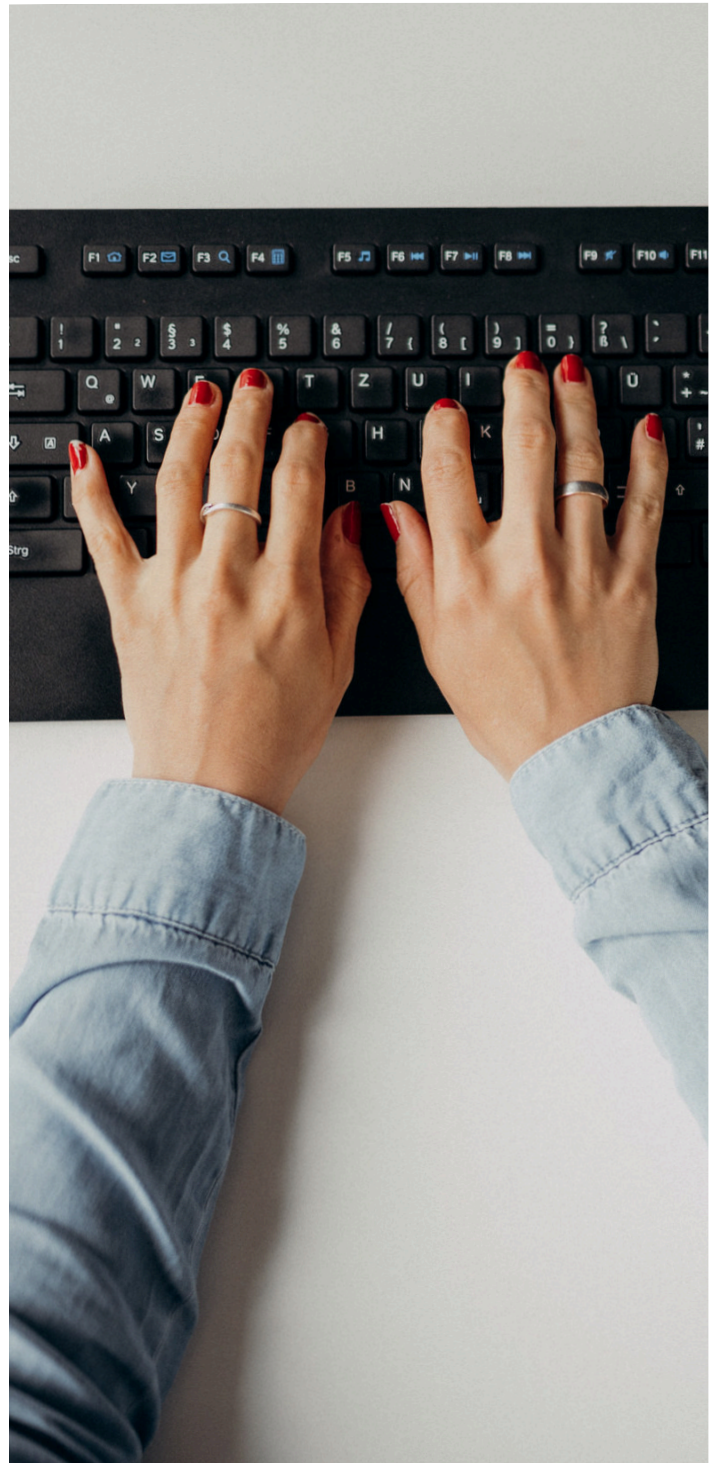
The next step is to determine the risk for each supplier using a defined evaluation system. This is based on the country's gross risk and the supplier's various risk minimisation measures, such as certificates or audit reports.

The net country risk is finally determined on the basis of the average net risk factors of the various suppliers in the country.

Based on the risks identified, we develop measures to prevent, minimise and rectify violations. The processes are adapted accordingly, based on the results.

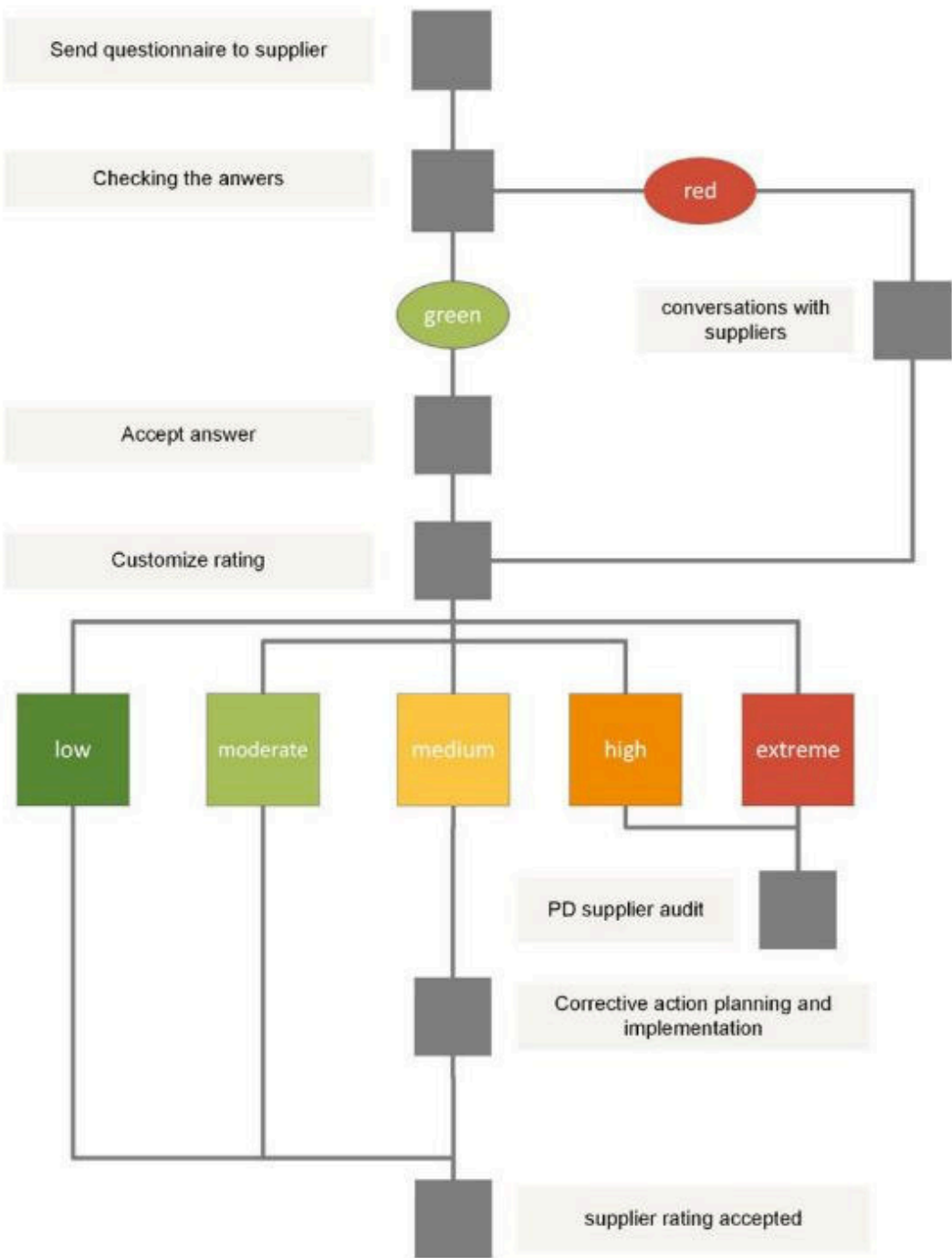
We review the effectiveness of the risk analysis on a regular basis as well as ad hoc, and adapt it to new requirements and guidelines.

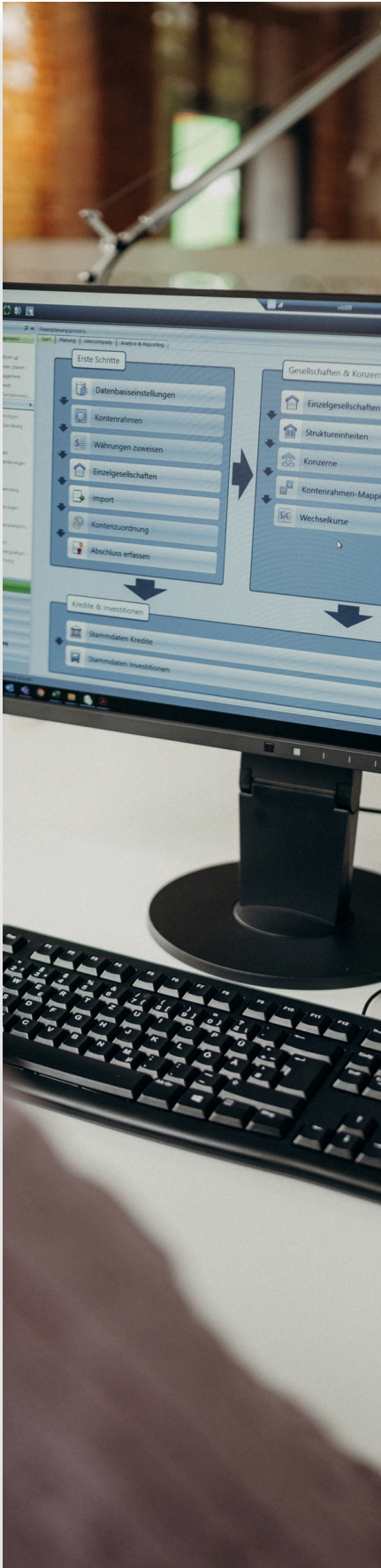
The tool's precise assessment methods and a description of the risks analysed can be found on [www.retraced.com](http://www.retraced.com).





Description of process supplier questionnaire





## Preventive and remedial measures

The Peppermint Group is a global company. Resources and materials for our products originate from both direct and indirect suppliers. With them, we maintain long-term, collaborative relationships.

The early detection of risks in our business area and among our business partners is crucial for successful risk management. This is the only way we can take preventive measures promptly and reduce risks.

To this end, we have established a supplier acceptance process in which new suppliers are screened for potential risks concerning human rights and the environment. We also strive for long-term and fair business relationships with our suppliers - only by working together can we achieve improvements in sustainability.



## Procedure for Notification and Complaints

We recognize that despite our extensive efforts to prevent human rights violations, violations can still occur. Therefore, establishing effective complaint mechanisms is essential. Complaints about potential compliance or human rights violations in our own operations and supply chain can be reported via the following link:

<https://peppermint.integrityline.app/>

In addition, Peppermint has appointed an independent contact person, our trusted attorney Dr. Carsten Thiel von Herff. As a lawyer, he is subject to statutory confidentiality and may not pass on any information to third parties without consent. Messages are treated confidentially and appropriately.

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## Our expectations

We are committed to ensuring that our measures make a significant contribution to effectively averting or further minimizing risks related to human rights and the environment. We consider it our responsibility to ensure that everyone involved in our business processes - be they our employees, suppliers or business partners - consistently adhere to and take into account the applicable laws, international conventions and our binding internal guidelines.

We will not tolerate any violations of these rules and regulations. Any such offence will result in appropriate sanctions, which will be imposed depending on the severity of the breach of duty. Should a supplier, business partner or employee violate essential provisions and at the same time show no willingness to take the necessary measures to comply with the defined obligations, we reserve the right to terminate the business relationship as a last resort (*ultima ratio*).

We are convinced that responsible action at all levels - both internally and along the entire supply chain - is crucial to sustainably minimizing the risks associated with human rights and environmental issues. This is the only way to ensure that our company acts in accordance with ethical standards and legal requirements and thus makes a positive contribution to protecting people and the environment.

