

# Supplier Code of Conduct Peppermint Gruppe

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Prepared By

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## Preamble



Responsible business management is one of the founding principles of our activities as the Peppermint Group (Peppermint).

In all our decisions, we strive to consider the economic, ecological, and social impacts and strike an appropriate balance of interests. The Supplier Code of Conduct describes the fundamental principles for our collaboration with our business partners.

Our Supplier Code of Conduct places particular emphasis on respect for human rights. It emphasizes our clear stance against child labor, forced labour, and any form of discrimination. At the same time, we define what we consider to be respectful and humane treatment. Furthermore, we describe our vision of a safe and healthy working environment within the company. Finally, we also formulate our requirements for the responsible treatment of nature and the welfare of animals to be met by your business partners. The content of our Supplier Code of Conduct is based on internationally recognised conventions and standards. These include the Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and conventions and recommendations of the International Labour Organization (ILO). We also consider important legal frameworks such as REACH, the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and the Stockholm Convention on Persistent Organic Pollutants.

In addition, the key themes of our Supplier Code of Conduct were developed based on the results of our stakeholder survey. This ensures that we meet both international standards and the expectations of our partners.

Our Supplier Code of Conduct serves as an essential foundation for identifying and addressing potential risks within our supply chain at an early stage. Consistent application of this code allows us to systematically identify vulnerabilities and take action before risks materialise.

Furthermore, our Supplier Code of Conduct plays a key role in proactively preventing exploitation and abuse of workers in our supply chain. It sets clear standards and expectations for our business partners, thus creating the conditions for fair and humane working conditions.

For the sake of readability, the use of the masculine, feminine, and diverse (m/f/d) forms is avoided. All personal pronouns apply equally to all genders.



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# Scope of applicability

This Code of Conduct applies for all service providers and suppliers of Peppermint and their subcontractors, hereinafter referred to as "business partners".

Our business partners comply with the laws and legislation of the countries in which they operate. Particularly in countries with weak state structures they ensure that they comply with the principles of this Code of Conduct in their own activities and also obligate their business partners to observe them. If existing national regulations contradict the provisions of this code or the domestic context makes it impossible to completely fulfil the responsibility to respect human rights, the companies should find ways to nevertheless observe the principles of internationally recognised human rights and the provisions of this Code of Conduct.

Peppermint's business partners must share this Code of Conduct with all their employees and subcontractors involved in the manufacture of products and other work for the Peppermint Group.



#### Responsibility

The highest level of the organisation, the management of Peppermint Holding GmbH, is responsible for implementing the policy. As the highest authority, it bears overall responsibility for compliance with and implementation of the established measures and principles.

#### Publication

The Supplier Code of Conduct is reviewed regularly by the relevant experts for necessary adjustments. Changes to this code require the approval of both the Compliance Officer and the shareholders.

At the beginning of a business relationship and at regular intervals, we provide our suppliers with our Supplier Code of Conduct. Our suppliers receive our Supplier Code of Conduct along with a letter of confirmation. By signing, the supplier declares that they adhere to the principles contained therein. If the supplier has their own Code of Conduct, its content must be consistent with our standards. Any deviations are discussed in an open dialogue and documented in a joint agreement. We have also published our Supplier Code of Conduct on our website to make it accessible to all stakeholders.



# Ethical business management and integrity

Our business partners employ legal business practices in compliance with the principles of fair competition, respecting the intellectual property rights of third parties and observing the provisions of anti-trust and competition laws. They reject all forms of corruption and bribery and in an appropriate manner promote principles of responsible business management like transparency, accountability, responsibility, openness and integrity. Business partners must be treated fairly. Contracts must be complied with insofar as the framework conditions do not fundamentally change. In general, ethical values and principles must be respected. This particularly applies for human dignity and internationally recognised human rights.

# Respect for internationally recognised human rights and social and environmental standards

The business partners of the Peppermint Group comply with the core labour standards of the International Labour Organisation (ILO) and create a safe, humane working environment.

Respect for internationally recognised human rights and social and environmental standards is the top priority for Peppermint. Peppermint Group only works with business partners which have the same attitude and respect internationally recognised human rights. Violations are not tolerated. If there is a risk of a violation of human rights, we expect to be promptly informed about it and about measures taken to prevent or mitigate it. We must also be promptly informed if a violation or breach of human rights occurs, including the social and environmental standards detailed below.

# Child labour and protection of young workers

#### **Prohibition of child labour**

The Peppermint Group is strongly opposed to direct or indirect employment of children under 15 years of age. We expect our business partners to refrain from employing children under 15 years of age. Appropriate mechanisms for establishing a person's age during the hiring process should be in place in order to prevent child labour. If companies learn of child labour, they should take necessary remedial action and social reintegration measures that focus on the welfare and protection of the child.

#### Protection of young workers

Our business partners are deemed to comply with this principle, without prejudice to specific expectations presented in connection with it, if they ensure that young people under the age of 18 do not perform any night-time work and are protected against working conditions that endanger their health, safety, morals and development. If young workers are employed, business partners must ensure that (a) the type of work they perform is not detrimental to their health or development; (b) their working hours are not detrimental to their participation in vocational training programmes recognised by the competent body or their ability to benefit from such education. The business partners of Peppermint Group must establish necessary mechanisms for the prevention, determination and limitation of harm for young workers, paying special attention to providing them with access to effective complaint mechanisms and training systems and programmes on the subject of occupational safety.



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## Forced labour

We do not accept business activities based on forced or compulsory labour, slavery, debt bondage or serfdom. This includes any type of work or service required of a person under threat of a penalty, for which they have not freely volunteered. No employee of Peppermint's business partners may be prevented from freely choosing the type of employment that they pursue nor from terminating their employment in compliance with the statutory notice periods. Workers must not on any account be restricted in their freedom of movement. It is impermissible for employers to retain deposits or employees' ID documents.

### Discrimination

Peppermint considers diversity and equal opportunities to be an important aspect of its contribution to society.

Business partners of the Peppermint Group are therefore prohibited from discriminating against, excluding or favouring individuals on the basis of gender, age, religion, race, caste, birth, social background, disability, ethnic or national origin, nationality, membership in employee organisations including trade unions, political membership or outlook, sexual preference, family obligations, marital status or other circumstance that could result in discrimination. In particular, employees must not be subjected to harassment or disciplinary measures for the above-mentioned reasons. There should also be no exclusion of individuals on the basis of the above-mentioned criteria with regard to the qualification of employees for management positions. Management positions should be filled on the basis of local and national regulations. We expect our business partners to set up appropriate promotion programmes and thus help to achieve balance in the long term with regard to filling management positions with persons of all genders, cultures, nationalities and religions. Furthermore, the principle of equal pay for male and female workers for the same work must be applied.

# Freedom of association and the right to collective bargaining negotiations

All employees of our business partners have the right to freely and democratically set up trade unions. They are not discriminated against due to trade union affiliations and have the right to negotiate collective agreements. Our business partners do not hinder employee representatives in accessing employees in the workplace or in interacting with them. If they operate in countries in which trade union activities are illegal or free and democratic trade union activities are not permitted, business partners take this principle into account in that they permit employees to select their own representatives with whom the company can enter into a dialogue concerning job-related issues.



### Humane treatment

Our business partners treat their employees with dignity and respect. They do not practice any form of degrading treatment, abuse, harassment or intimidation or impose unlawful penalties on employees. Any use of third parties to carry out punishments or sexual, physical or mental violence is prohibited. Disciplinary measures are recorded in writing in a form which is comprehensible for the employee.



# Working hours

Insofar as applicable national laws or applicable provisions under a collective bargaining agreement do not provide for lower maximum working hours, the regular working hours should not exceed 48 hours per week plus a maximum of 12 overtime hours per week. Overtime is paid at least in accordance with the respective legal regulations or the provisions of a collective bargaining agreement.

It is only permitted if the employees have agreed to the additional work or if additional work is provided for by law or applicable collective work agreements (e.g. collective bargaining agreements). It should only be required as an exception. The companies grant their employees the right to breaks on every working day and observe the currently applicable statutory public holidays. After six consecutive days of work one day off must be granted, unless exempItions stipulated by collective agreements apply. Every employee of our business partners should be granted the minimum holiday leave proIvided for by law or under a collective bargaining agreement.

# Remuneration / fair wages

We are committed to the ongoing payment of a living wages. Every employee must receive an appropriate wage for their work that covers their basic needs and guarantees a freely disposable income.

We expect our business partners to take the concept of a living wages into account when deciding on wages and to gradually close any gaps within their means. If this cannot be guaranteed, our business partners must take appropriate measures to gradually increase their employees' remuneration and standard of living. State or collectively agreed minimum wages must not be undercut. Likewise, all national or regional requirements regarding the payment of health insurance, social security contributions and special benefits must be complied with. Overtime must be remunerated with the legally stipulated premium. Wages are not withheld and are paid regularly in a form suitable for the employee. Deductions from wages are only permitted within the legal or collectively agreed framework and must be documented and documented.

Furthermore, the principle of equal pay for male and female employees for work of equal value shall apply.

We reserve the right to check compliance with this requirement with our supply partners.

# Health and safety in the workplace



Our business partners undertake to create a healthy, safe working environment for their employees.

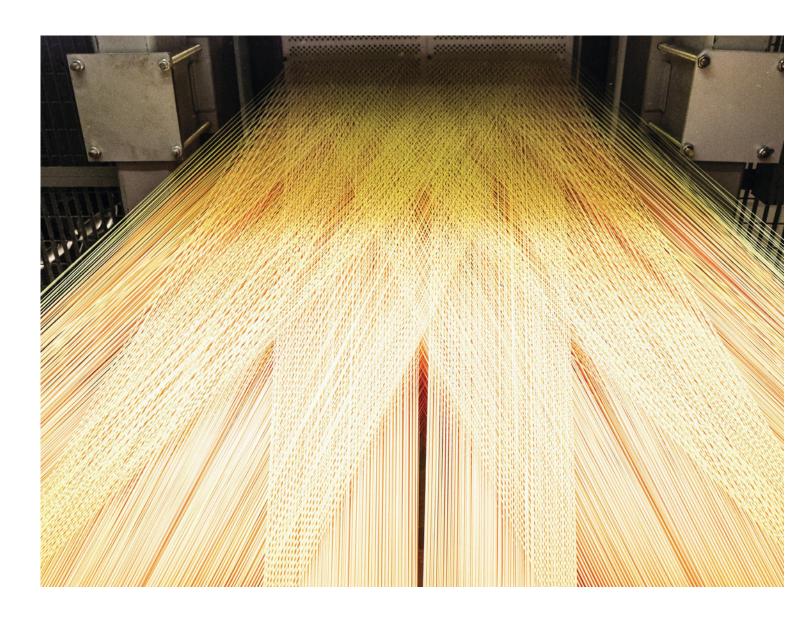
For that purpose they take all necessary measures to prevent accidents and health risks at work. Applicable local regulations on occupational safety, health and safety in the workplace as well as building safety and fire prevention are complied with in order to reduce the risk of accidents and occupational sickness to a minimum. Employees are given access to clean drinking water. Where necessary and appropriate employees are provided with appropriate personal protective equipment. In situations of direct risk employees have the right and obligation to leave their workplace immediately and without permission. Vulnerable persons such as young employees, young mothers and pregnant persons, as well as people with disabilities, should receive special protection. All employees must be regularly informed and trained on applicable health and safety regulations as well as safety measures. The business partners must document this.



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# Purchase, extension and development of production or service facilities

Our business partners should set up and extend their business and carry out construction projects in accordance with applicable national laws. We expect fair treatment of all partners in this process. On no account should a party be deprived of land, woodland, water or other items that encroach on the party's fundamental rights. National and local requirements with regard to applications for the development and purchase of acquisition of property should be complied with. Our business partners must maintain documentation in this respect.

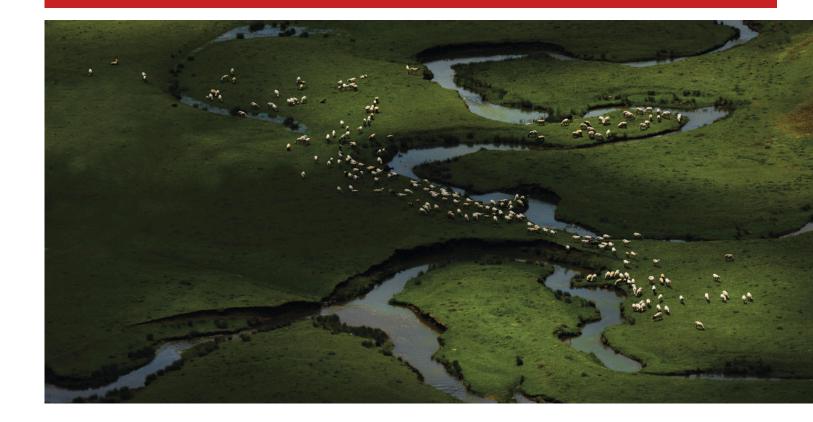


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# 5 Environment

Our business partners comply with applicable laws, regulations and administrative practices for the protection of people and the environment in the countries in which they operate.

They should generally conduct their business activities in such a way that they contribute to the general goal of sustainable development. For that purpose they should set up a system tailored to their company which enables them to analyse their operating activities in order to identify adverse effects on the environment and take all necessary and reasonable measures to reduce negative consequences for people and the environment and prevent damage to the environment, as well as take remedial action within the limits of their capacities, in compliance with existing regional laws and regulations. We expect our suppliers to make every effort to continually improve their environmental results in the long term by promoting the introduction of appropriate technologies and production processes which enable efficient use of natural resources and energy and minimise emissions.



#### Energy consumption and greenhouse gas emissions

Peppermint expects that its service providers and suppliers continually work towards reducing energy consumption and emissions. For that purpose the relevant energy sources and greenhouse gas emissions should be identified and monitored. Harnessing energy from renewable sources and and applying energy efficiency measures measures should be encouraged.

#### Water consumption

Our business partners must ensure that water consumption involved in their business operations is continually optimised. They must strive to avoid extracting groundwater for production operations and ensure that local drinking water reserves are protected. Extraction of groundwater or surface water must comply with local legal regulations, as a minimum requirement. It must be ensured that the extraction of water for production operations does not impede the available ecosystem, the drinking water supply and the water supply for sanitary systems. We expect documentation in that respect from our business partners.



#### Management of chemicals and wastewater

Peppermint expects its business partners to ensure that the use or production of utilised or supplied chemicals occur in accordance with the provisions and requirements of EU legislation on the registration, evaluation, authorisation and restriction of chemicals (REACH). In addition, the guidelines of the Stockholm Convention on Persistent Organic Pollutants must be complied with. If, in the course of production processes, used chemicals or other substances constitute a risk for people or the environment, suppliers should ensure that use and handling, as well as storage and transport, are regulated by hazardous substance management. Local and national regulations must be complied with. We also expect business partners which use and produce chemicals to regularly monitor wastewater flows, which must be documented and submitted. Wastewater flows must fulfil national and local requirements, as a minimum standard.

Peppermint's business partners should strive for long-term reduction and minimisation of waste and implement waste recycling measures.

#### Use of land

The Peppermint Group's business partners should handle resources responsibly at all times and use them exclusively in connection with the envisaged purpose. Adverse changes to the soil due to the use of environmentally harmful substances and substances that affect soil and water are explicitly prohibited. Local and national regulations must be complied with. Our business partners are to develop long-term strategies for conserving all available and utilised resources as well as possible.

#### Noise emissions

Peppermint expects its business partners to steadily reduce the noise emissions generated by their business operations. They must ensure that neither employees nor residents are at risk of suffering from hearing impairment. Appropriate precautionary measures must be implemented and, where necessary, external stakeholders must be consulted in order to regulate noise emissions. National and local regulations apply, as a minimum requirement.

#### Waste management

Our business partners must set up waste management which at least complies with the provisions and requirements of national and local regulations and the provisions of the Stockholm Convention on environmentally sound handling, collection, storage and disposal of waste. Furthermore, in accordance with the Basel Convention there should be no export or disposal of hazardous waste.



# Animal welfare

In their commercial activities Peppermint's business partners comply with the principles of animal welfare.

Animal husbandry and use must be appropriate for the type of animal in question. Our business partners recognise the Washington Convention (CITES) on International Trade in Endangered Species of Wild Fauna and Flora and conduct their commercial activities in line with it.

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### Communication

Peppermint promotes open dialogue. A reporting system, also known as a whistleblower system, is an important tool in companies and organizations designed to help stop violations, correct grievances, and highlight undesirable developments. It allows employees, suppliers, customers, or other stakeholders to share information confidentially and, if desired, anonymously.

To submit a hint, the following portal is available: https://peppermint.integrityline.app/. Our business partners communicate the contents of the Supplier Code of Conduct to employees, contractual partners, and, where applicable, to third parties. The contractual partner should be able to understand that compliance with the Supplier Code of Conduct is generally guaranteed. However, for legal reasons, the disclosure of trade and business secrets or competitionrelated or other sensitive information is excluded.

Thank You!

Ingeborg Neumann Founder & Managing Partner

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