

## **Code of Conduct**

### **1. Our Self-Image**

When master butcher Carl Müller founded his country butchery in 1834 in Rügenwalde in Pomerania, he laid the foundation for our company. He passed on his skills and knowledge as well as his passion for quality to the following generations. To this day, we in our family business place great value on the quality of our products as well as on care and safety during production. Our self-image is also characterized by a responsible attitude towards our employees, our business partners, society, the environment and future generations. This Code of Conduct explains what we understand by this in concrete terms. The code is binding for ourselves and is an essential part of our expectations of suppliers and business partners. Therefore, the contractual partners commit themselves by signing to meet the requirements of the Code of Conduct.

### **2. Principles**

The basis for Rügenwalder Mühle's Code of Conduct are international standards and guidelines.

These include:

- The Universal Declaration of Human Rights of the United Nations
- The UN Convention on the Rights of the Child
- The conventions of the ILO (International Labor Organization) of the United Nations, especially the "core labor standards" of the ILO.

For this Code of Conduct we considered the "Base Code" of the Ethical Trading Initiative (ETI), the principles of the Code of Conduct of the Amfori Business Social Compliance Initiative (amfori BSCI) as well as aspects of animal, environmental and climate protection. Furthermore, we are guided by sustainability goals such as the UN Sustainable Development Goals.

### **3. Compliance with laws**

An essential part of responsible and ethical conduct for us is compliance with the law. For this reason, Rügenwalder Mühle employees have "compliance guidelines" that explain the principles, values and obligations to which everyone must adhere. We also expect our business partners to fully comply with all relevant national and local laws and regulations that affect their business activities.

### **4. Product safety and quality**

Rügenwalder Mühle attaches great importance to the safety and quality of its products. We expect the same from our suppliers. We therefore demand compliance with all laws and regulations regarding product safety. A certified quality management system must be installed. In addition, written documented procedures with definition of responsibilities for the following aspects are considered as minimum requirements:

- Observance of all laws and regulations on product safety
- Risk assessment (HACCP concept)
- Traceability according to EU VO 178/2002 and VO 1935/2004
- Quality assurance
- Hygiene measures-Crisis Management

### **5. Human rights, labor requirements and working conditions**

#### **5.1 Forced labor**

Forced labor, slave labor or comparable compulsory labor is not permitted. All work must be voluntary. Debt bondage or involuntary prisoner labor is not tolerated. Employees shall be able to leave the workplace at any time after work has been performed and to terminate the employment relationship after observing the period of notice.

## **5.2 Child labor**

In no phase of production is child labor used in an organized form, especially no exploitative and dangerous child labor. The business partners adhere to the ILO conventions on the minimum age (not below 15 years) for the employment of children. The school education of the children should not be impaired. Young workers between the ages of 15 and 18 are given special protection, especially with regard to working conditions that could endanger their health or safety.

## **5.3 Remuneration**

The business partner pays the employees an appropriate remuneration, which at least corresponds to the legal minimum wage or the standard value customary in the industry of the respective country. Wage payments are made on time, regularly and in full.

## **5.4 Working hours**

The working hours comply at least with the legal regulations of the respective country or the standard values customary in the industry. The standard weekly working time, excluding overtime, should not exceed 48 hours. \*Overtime must be worked voluntarily and is compensated with an overtime bonus.

\*Setting the upper limit for the regular weekly working time at 48 hours corresponds to both the SA 8000 standard and, for example, the German Working Hours Act. This is based on the assumption that eight hours of daily working time with six working days (=48 hours) and at least one dayoff per week is the regular upper limit.

## **5.5 Freedom of association and complaint mechanisms**

Workers have the right to organize in unions, to assemble or to join an association of their choice. The right to collective bargaining is respected. If trade union activity is not permitted in the respective country, the business partner shall make it easier for its employees to appoint their own representatives in order to be able to clarify employee issues with the company without fear of disadvantages. Individuals and communities should have the right and opportunity to make complaints.

## **5.6 Discrimination**

Discrimination or exclusion of employees is not permitted. This applies in particular to discrimination based on gender, age, religion, skin color, social background, mental or physical disability, ethnic or national origin, sexual orientation, religious or political beliefs, marriage, pregnancy, family situation or other personal characteristics. The right to equal opportunities and equal treatment is respected. The personal dignity, privacy and personal rights of everyone are respected.

## **5.7 Abuse**

No forms of physical abuse, punishment and coercion as well as psychological, mental, sexual or physical harassment will be tolerated. Also, the threat of physical punishment and verbal abuse will not be tolerated. Any form of intimidation is prohibited.

## **5.8 Working conditions**

The business partner shall provide its employees with a safe and hygienic working environment that is not hazardous to health and shall comply with the applicable national occupational health and safety regulations. If these are insufficiently or inadequately implemented, international standards apply to ensure a high level of safety and protection for the workers. Employees in need of protection, such as adolescent employees, young mothers and pregnant women, and people with disabilities, are given special protection. Occupational safety systems are designed to identify potential risks to the health and safety of employees so that appropriate preventive measures can be taken against accidents and damage to health. Employees are regularly informed and trained on health and safety regulations. Access to drinking water and clean sanitary facilities is provided. Where accommodation is provided for employees, it shall be safe, clean and healthy and meet the basic needs of the employees.

## **5.9 Employment relationship**

The employment relationships are regulated and are in accordance with national legislation and international labor standards. Precarious employment relationships are not permitted. \*Before joining the company, employees receive clear and comprehensive information about their rights, obligations, working conditions, working hours and remuneration. No employment relationships are tolerated that circumvent or avoid regular employment, such as training pro-grams that are not designed to provide qualifications or seasonal work designed to undermine workers' protection. The social security system complies with the legal requirements or the respective industry standards.

\*An employment relationship is classified as precarious if the wage is too low to secure one's own existence through the wage.

## **6. Environmental resource and climate protection**

The business partners of Rügenwalder Mühle adhere to the applicable legal environmental protection regulations. These include among others

- the treatment and discharge of industrial waste water
- how to deal with air emissions
- the handling of waste and hazardous substances
- the contamination of soil.

In accordance with the precautionary principle, we expect our business partners to avoid or reduce environmental pollution and negative ecological effects of their activities, products and services as far as possible. Environmental responsibility also includes the most careful handling of raw materials and supplies and the economical use of packaging and logistics materials. The use of natural resources is to be minimized, energy efficiency is to be continuously improved, and electricity requirements are to be covered by renewable energies wherever possible. We very much welcome it when our suppliers make an active contribution to climate protection and significantly reduce climate-relevant emissions.

## **7. Animal welfare**

We expect our suppliers to comply with at least the legal animal welfare standards and, if possible, with animal welfare standards that go beyond these. Together with our meat raw material suppliers, we are committed to improving animal welfare and animal welfare.

## **8. Ethical business conduct**

### **8.1 Integrity and corruption**

All forms of corruption, extortion, bribery, embezzlement or the granting of an unfair financial or other incentive are prohibited. This applies in particular to relations with business partners, representatives from politics, the media and the public or government institutions. Procedures for monitoring this policy are to be applied. We expect a high level of integrity from our business partners.

### **8.2 Competition**

The business partner undertakes to refrain from activities that impair fair competition or fair business activities. The applicable antitrust laws are to be applied, in particular agreements and other activities that may influence prices or conditions are prohibited.

### **8.3 Confidentiality and data protection**

The collection of personal information from clients, business partners, suppliers, customers, employees and consumers is carried out in accordance with the reasonable expectations of these groups. The collection, storage, processing and transmission of personal information is subject to applicable data protection and information security laws.

### **8.4 Intellectual property**

Intellectual property rights must be respected. In case of technology and know-how transfer, intellectual property rights and customer information are protected.

## **9. Scope and implementation of the requirements**

The Code of Conduct applies to all workplaces and all employees of business partners, even if they are employed without a contract, on a fixed-term or part-time basis. We expect our business partners to implement appropriate risk management within their own supply chains. It should be possible to identify risks associated with this Code of Conduct so that measures can be taken to eliminate them if necessary. We reserve the right to review the implementation of the Code of Conduct by means of appropriate measures. If the Code of Conduct is not adhered to or if the business partner informs Rügenwalder Mühle of deviations from the Code of Conduct, we generally provide the opportunity to initiate and implement the elimination of the deficiencies as part of an action plan. If no improvements are achieved or if the business partner disregards the basic values explained in this Code of Conduct, we reserve the right to suspend or terminate the business relationship as a last resort. Rügenwalder Mühle and the business partner strive to ensure that their sub-suppliers and subcontractors are also informed about the contents of the Code of Conduct and comply with its requirements. This corresponds to our wish that there should be a common basic understanding of social and ecological responsibility, ethical principles and sustainable business practices throughout the entire supply chain. This can only be achieved through close exchange and cooperation with suppliers and business partners.

## **10. Complaints**

Rügenwalder Mühle requests the active assistance of all parties in complying with the values and guidelines set out in the Code of Conduct. We therefore ask you to report any violations to the respective contact person in the specialist department. The human resources department or the works council is responsible for internal violations.

## **11. Acknowledgement and agreement**

The Code of Conduct becomes effective upon signature. The business partner thereby commits itself to act responsibly in the sense of the Code of Conduct and to adhere to the guidelines.

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Place, date, signature and company stamp