

# PEPPERMINT



## Code of Conduct Peppermint Gruppe

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Prepared By

**Ingeborg Neumann**

Founder & Managing Partner

**Marcus Baumbach**

Managing Partner

Address

**Peppermint Holding GmbH**

Neues Kranzler Eck

Kurfürstendamm 21

10719 Berlin

## Preamble



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

Whenever we have a decision to make, we make a sincere effort to consider its economic, environmental and social effects and achieve an appropriate balance of interests. With this in mind, this Code of Conduct describes the basic principles underpinning our cooperation with our business partners..

The content of this Code of Conduct is based on international conventions like the Universal Declaration of Human Rights, the United Nations "Guiding Principles on Business and Human Rights", the OECD Guidelines, conventions and recommendations of the International Labour Organisation (ILO), REACH and the Basel Convention on environmentally sound waste management and the Stockholm Convention on Persistent Organic Pollutants.



## Index.

01.	Scope of applicability	Seite 05
02.	Ethical business management and integrity	Seite 06
03.	Respect for internationally recognised human rights and social and environmental standards	Seite 06
04.	Child labour and protection of young workers	Seite 07
05.	Forced labour	Seite 08
06.	Discrimination	Seite 08
07.	Freedom of association and the right to collective bargaining negotiations	Seite 09
08.	Humane treatment	Seite 10

09.	Working hours	Seite 11
<hr/>		
10.	Remuneration / fair wages	Seite 11
<hr/>		
11.	Health and safety in the workplace	Seite 12
<hr/>		
12.	Purchase, extension and development of production or service facilities	Seite 13
<hr/>		
13.	Environment	Seite 14-16
<hr/>		
14.	Animal welfare	Seite 17
<hr/>		
15.	Communication	Seite 18
<hr/>		

## 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.



## 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 Peppermint Holding GmbH 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 Holding GmbH 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 Holding GmbH 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.



## 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 exemptions stipulated by collective agreements apply. Every employee of our business partners should be granted the minimum holiday leave provided for by law or under a collective bargaining agreement.



## Remuneration / fair wages

**Each employee must receive a reasonable wage for his/her work that covers his/her basic needs and guarantees freely available income. If this cannot be done, our business partners must take appropriate measures to gradually increase the remuneration and standard of living of their employees.**

Minimum wages must not be lower than those set under applicable under national laws or collective bargaining agreements. All national or regional requirements with regard to the payment of medical insurance, social security

contributions and special payments must also be complied with. Overtime must be paid with the supplement provided for by law.

Wages are not withheld and are paid regularly in a form being appropriate for the employee. Wage deductions are only permitted within the limits provided for by law or collective bargaining agreements and must be specified and substantiated.

Furthermore, the principle of equal pay for male and female workers for the same work must be applied.

## Health and safety in the workplace



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

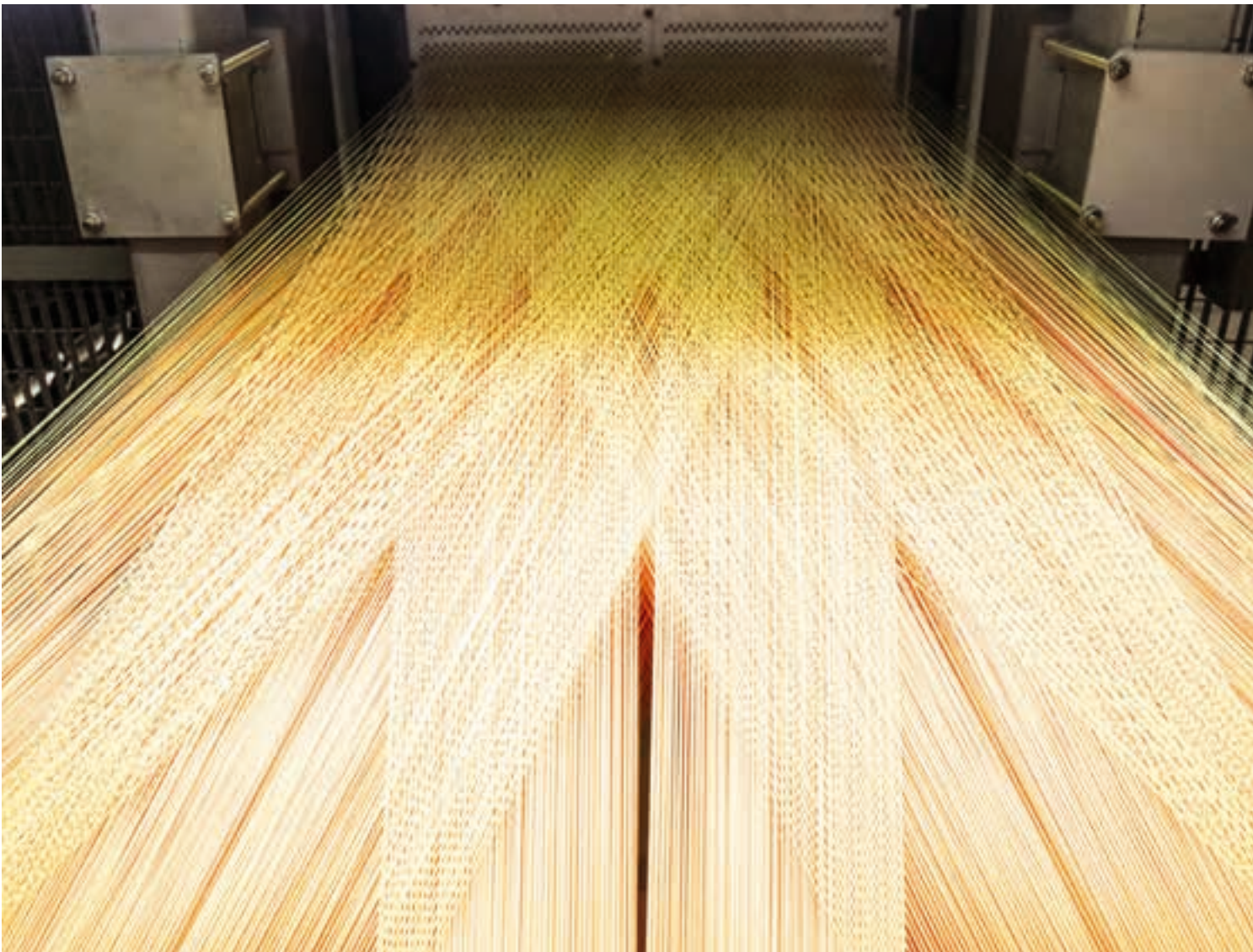
For that purpose they take all necessary measures to prevent accidents at work and health risks. Applicable local regulations on occupational safety, health and safety in the workplace as well as building safety and fire prevention are complied with in order to reduce the risk of accidents and occupational 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 and safety measures. The business partners must document this.





## **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.





## Environment

**Our business partners fulfil 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 such 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 furthering 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. The use of energy from renewable sources and energy efficiency 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 drawing groundwater for production operations and ensure that local drinking water reserves are protected. Drawing of groundwater or surface water must at least comply with local legal regulations. It must be ensured that drawing water for production operations does not restrict the available ecosystem, the drinking water supply and the water supply for sanitary systems. We expect documentation in that respect from our business partners.





## Chemical and wastewater management

Peppermint expects its business partners to ensure that the use or production of utilised or delivered chemicals occurs 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 the production and use of persistent organic pollutants must be complied with. If, in the course of production processes, chemicals or other substances are used which constitute a risk for people or the environment, suppliers should ensure that their use and handling, as well as their storage and transport, are regulated through 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 at least fulfil national and local requirements.

## 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.

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. At least local and national regulations must be complied with. Our business partners should develop long-term strategies for handling the available and utilised resources in such a way as to conserve them.

## 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 exposed to the possibility of a hearing impairment. Appropriate precautionary measures must be implemented and, where necessary, external stakeholders consulted in order to regulate noise emissions. At least national and local regulations apply.



## Animal welfare

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

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Animal husbandry and utilisation must be appropriate for the type of animal in question. Our business partners recognise the Washington Convention (CITES) for the protection of endangered species of fauna and flora and conduct their commercial activities in line with it.





## Communication

Our business partners must communicate the content of this Code of Conduct to their employees, contract partners and, where appropriate, third parties. It should be clear for contract partners that compliance with the Code of Conduct is generally guaranteed. However, any disclosure of company or business secrets, competition-related information or other information meriting protection is excluded from this for legal reasons.

Thank You!

A handwritten signature in blue ink, appearing to be 'I. Neumann'.

Ingeborg Neumann  
Founder & Managing Partner

A handwritten signature in blue ink, appearing to be 'M. Baumbach'.

Marcus Baumbach  
Managing Partner