



BERENTZEN-GRUPPE  
Thirst for life



# SUPPLIER CODE OF CONDUCT

Responsible  
purchasing



# CONTENT

---

## **3 Introduction and Objectives of the Supplier Code of Conduct**

## **4 Scope**

### **Our Supplier Principles**

- 5 Prohibition of Forced Labour and Slavery
- 5 No Child Labour
- 6 Freedom of Association
- 6 Safe and Hygienic Working Conditions
- 6 Adequate Compensation
- 7 Regulated Working Hours and Employment Conditions
- 7 Equal Treatment and Prohibition of Discrimination and Harassment
- 7 Rights of Local Communities
- 7 Environmentally Responsible Conduct
- 8 Animal Welfare
- 8 No Corruption
- 8 Business Integrity
- 9 Competition and Antitrust Law
- 9 Conflicts of Interest
- 9 No Money Laundering
- 9 Insider Trading
- 9 Product Quality and Safety
- 10 Protection of Personal Data
- 10 Information Security

## **11 Compliance and Implementation of the Supplier Code of Conduct**

## **11 Entry into Force and Amendments to the Supplier Code of Conduct**

## **12 Whistleblower System**

## **13 Information about the Publisher**

# OUR SUPPLIER CODE OF CONDUCT

## Introduction and Objectives of the Supplier Code of Conduct

The Berentzen Group is a long-established, internationally active group of companies in the beverage industry with a history spanning over 260 years. As a supplier of alcoholic and non-alcoholic beverages, we strive to ensure quality, sustainability and ethical integrity in all our business areas. In today's globalised world, our suppliers are essential partners who contribute significantly to our success. Therefore, we place great value on our suppliers adhering to the highest standards in their business practices and social responsibility.

This Supplier Code of Conduct sets out the minimum economic, environmental and social requirements for cooperation with the Berentzen Group. It provides a clear understanding of respectful treatment of people and the environment and requires our suppliers to respect human rights, ensure fair working conditions and take active measures to prevent environmental harm. This Code of Conduct enables us to build long term and sustainable business relationships and to strengthen mutual trust between the Berentzen Group and its partners. It forms the basis for shared values and a successful partnership.

The aim of the Supplier Code of Conduct is to establish a common understanding of appropriate living and working conditions that is supported by all suppliers and their employees. It is based on international human rights such as the UN Guiding Principles on Business and Human Rights, the core labour conventions of the International Labour Organisation (ILO) and the ten principles of the UN Global Compact. We expect our suppliers to act in accordance with these standards and norms. The Code of Conduct does not prevent more specific or stricter requirements from being set out in additional contractual provisions.

*For reasons of readability in particular, this Supplier Code of Conduct does not use gender-neutral language. Corresponding terms apply to both genders in the interests of equal treatment; this also applies to all other gender-specific terms used.*



## Scope

The Supplier Code of Conduct applies to all suppliers of the Berentzen Group. This also includes any third parties who regularly and to a material extent act for or on behalf of the Berentzen Group or are involved in the value chain of products or the provision of services for the Berentzen Group. Examples include business partners, subcontractors, minority shareholders, commercial agents and freelance workers.

By confirming this Code of Conduct, our suppliers undertake to respect and comply without reservation with the conditions set out herein and with the international agreements referred to, in particular in the areas of "People" and "Environment". Suppliers acknowledge that compliance with the provisions of the Code of Conduct is a prerequisite for the establishment and continuation of supplier relationships with our company.

Our suppliers commit not to conclude agreements or take measures intended to circumvent the obligations arising from this Code of Conduct. Permissible forms of cooperation (e.g. contracts for work and services, subcontracting, home working arrangements, apprenticeship programmes or fixed term employment contracts) must not be used to evade the provisions of the Code of Conduct.

Furthermore, our suppliers undertake not to engage in any acts or omissions, either themselves or through third parties acting on their behalf, that constitute a clear and serious violation of internationally recognised human rights. A violation is considered "clear and serious" if, after an objective assessment of all circumstances based on the UN Guiding Principles on Business and Human Rights, the relevant ILO core conventions and other human rights standards recognised under international law, it can be classified as manifestly unlawful.





## OUR SUPPLIER PRINCIPLES

5

Responsible  
purchasing

### (1) Prohibition of Forced Labour and Slavery

All forms of forced and compulsory labour are strictly prohibited. Employees must not be forced to work or enter into an employment relationship by the use of violence or threats (e.g. debt bondage or slavery). This also includes the prohibition of compelling employees to continue working by withholding wages, social benefits, property or identity documents. Suppliers must not require employees to pay fees in connection with their employment (e.g. recruitment or transportation fees).

### (2) No Child Labour

The Berentzen Group does not tolerate any form of child labour. Our suppliers are required to ensure that child labour is fully prevented both in their own business areas and at their subcontractors. The worst forms of child labour must be completely excluded in accordance with ILO Convention No. 182.

The minimum age for employment corresponds to the legal requirements of the country where the workplace is located and is at least 15 years, unless national provisions in line with ILO Convention No. 138 permit employment of young persons aged 13 to 15 for light work that does not endanger their health or development.

Minors under the age of 18 must not be assigned to work that jeopardises their safety, health or moral development, such as overtime or night work.



### (3) Freedom of Association

Employees have the right to organise themselves to protect or represent their interests. To this end, they may establish or join an association. They shall also have the right to collective bargaining. Where national law restricts these rights, employers should not impede the development of equivalent means for independent and free organisation and for collective bargaining.

### (4) Safe and Hygienic Working Conditions

Our suppliers must ensure the health and safety of employees at all workplaces. They must at least comply with applicable laws and regulations on occupational health and safety and take appropriate measures to prevent accidents, injuries and work related illnesses. Preventive concepts and occupational health and safety procedures must be established and regularly reviewed.

Employees must be informed about these measures and relevant regulations and trained, for example, through occupational safety drills. We expect our suppliers to create a safe, healthy and respectful working environment that promotes the well being of their employees and continuously improves it.

This includes providing safe drinking water, adequate sanitary facilities, sufficient lighting and suitable temperature control and ventilation. In addition, fire protection measures, clearly marked escape routes and emergency plans must be in place. The topics of building safety, personal protective equipment and occupational health care must be treated with due care.

It must also be ensured that workplaces and shared spaces comply with applicable hygiene standards. Where accommodation is provided, it must be safe, clean and in good condition and meet employees' basic needs.

We expect our suppliers to regard occupational safety and health as an integral part of sustainable and responsible corporate management in the interest of people, the environment and a long term successful cooperation.

### (5) Adequate Compensation

Employees have the right to receive their agreed compensation regularly, fully and on time. Our Suppliers shall pay fair compensation for work performed. As a minimum, pay must at least meet the applicable statutory minimum wage, any applicable collectively agreed minimum wages and other contractually agreed minimum standards. Compensation should be sufficient to provide a decent living for employees. All employees shall be entitled to statutory and contractually required benefits (e.g. social security contributions, paid leave, allowances, overtime pay). Withholding part or all of wages as a disciplinary measure is prohibited. Wage reductions not explicitly permitted by law must not be made without the express consent of the employees.



**(6) Regulated Working Hours and Employment Conditions**

Maximum working hours per day and per week shall comply with applicable national laws and industry standards. Employees should not regularly be required to work more than 48 hours per week, or more than 60 hours per week including overtime. Overtime should be voluntary and compensated in accordance with national law. On average, employees must be granted at least one day off every seven days.

Employment contracts shall be concluded with employees in accordance with applicable national law.

**(7) Equal Treatment and Prohibition of Discrimination and Harassment**

All employees must be treated with dignity and respect. Corporal punishment, sexual harassment, physical or psychological coercion and any form of harassment or intimidation are strictly prohibited. Discrimination on grounds of ethnic or national origin, caste, religion, age, disability, sex, marital status, sexual orientation, political opinion, personal characteristics or membership in employee organisations is prohibited. Workers shall receive equal pay for work of equal value.

**(8) Rights of Local Communities**

Our suppliers are obliged to respect the legal and cultural particularities of the communities in which they operate. This includes, in particular, land use rights and access to natural resources. Suppliers must ensure that they do not participate in land grabbing. Our suppliers must also refrain from unlawful forced evictions of land, forests and waters that serve as a livelihood for persons when acquiring, cultivating or otherwise using such resources.

**(9) Environmentally Responsible Conduct**

The Berentzen Group requires its suppliers to assume responsibility for environmental protection and to embed sustainable practices firmly within their operations. Compliance with all national and international environmental laws and regulations must be ensured. Suppliers should actively take measures to reduce their environmental impact and use natural resources efficiently. This particularly includes management of material use, energy and water consumption, and waste and emissions management.

Our suppliers are expected to establish systems for continuous monitoring and improvement of their environmental impacts. This includes reducing greenhouse gas emissions through the use of renewable energy, implementing efficient energy and environmental management systems and promoting circular economy approaches. Preparing a greenhouse gas inventory in accordance with the GHG Protocol and implementing energy and environmental management systems, for example in line with ISO 50001 and ISO 14001, are important steps.

We expect our suppliers to commit to reducing and controlling environmental hazards along their entire supply chain and to actively cooperate with their own suppliers in this regard. This also includes applying environmentally friendly



production methods and implementing strategies for reuse and recycling of materials. The disposal of waste and hazardous substances must be environmentally sound and in accordance with applicable regulations, taking into account international conventions such as the Basel Convention.

### **(10) Animal Welfare**

Our suppliers are required to comply with applicable laws for the protection and welfare of animals within their supply chains (e.g. the German Animal Welfare Act or the European Union's Directive on the Protection of Animals used for Scientific Purposes). We expect affected suppliers to implement standards to ensure animal welfare and to continuously monitor compliance.

### **(11) No Corruption**

Suppliers are prohibited from offering or promising personal or improper advantages, directly or through intermediaries, to obtain or secure business or other advantages from third parties, whether in the public or private sector. Our suppliers must not pay or accept bribes or agree to or accept kickbacks. Suppliers are also prohibited from engaging in conduct that would violate applicable anti corruption laws and regulations, including the U.S. Foreign Corrupt Practices Act and the UK Bribery Act, or from inducing their business partners to do so.

Gifts, hospitality and invitations generally fall under the term "benefits". Subject to the recipient's applicable compliance rules, the following applies:

Only gifts, hospitality or invitations are permitted that simultaneously meet all of the following criteria:

- They comply with the customary practices in the recipient's location;
- they are objectively justified, of minor to moderate value and occur only occasionally;
- they serve a legitimate business purpose (e.g. fostering business relations, appropriate business events) and are not intended to influence a business partner's decision;
- they do not violate applicable law or the recipient's compliance requirements (if any).
- Examples of 'customary local practices' may include small regional hospitality gifts or modest catering at business meetings to the extent customary in the relevant culture and industry.

### **(12) Business Integrity**

Our suppliers are obliged to comply with all trade laws and regulations applicable in the countries where materials are procured, manufactured and integrated into Berentzen Group products (country of use). In the case of services, the place of performance is decisive.





### **(13) Competition and Antitrust Law**

The principles of market economy and fair competition form the basis of the Berentzen Group's business activities. We therefore expect our suppliers to comply with applicable national and international competition and antitrust laws.

### **(14) Conflicts of Interest**

Our suppliers must remain free from the influence of actual or potential conflicts of interest when conducting business with the Berentzen Group. Suppliers must immediately disclose any business relationship in which they are involved (or plan to become involved) that could lead to an actual or potential conflict of interest or the appearance of a conflict of interest.

### **(15) No Money Laundering**

Our suppliers undertake to prevent money laundering and terrorist financing in any form. They must not enter into or continue business relationships intended to introduce assets derived from criminal offences into the legal economy or to facilitate the financing of terrorism, whether through funds or other assets (e.g. goods). In the event of reasonable suspicion of money laundering or terrorist financing, suppliers must report this immediately to the competent authorities and to the Berentzen Group and cooperate fully with any investigations. Violations of this obligation entitle the Berentzen Group to take appropriate measures, including the immediate termination of the business relationship.

### **(16) Insider Trading**

Our suppliers and their employees, agents and other persons working on their behalf may not disclose insider information, i.e. non-public, price-sensitive information about the Berentzen Group or other business partners, to third parties or other employees without authorisation or make it available in any other way. Exceptions are only permitted if other employees require this information in the normal course of their employment or profession or in the normal performance of their duties. Under no circumstances may insiders use their knowledge advantage for business purposes, either directly or through third parties, or make recommendations to buy or sell. This also means that insiders must refrain from private trading in securities of Berentzen-Gruppe Aktiengesellschaft for the duration of their insider knowledge.

### **(17) Product Quality and Safety**

The Berentzen Group expects its suppliers to adhere to high standards of product quality and safety. All products must comply with legal requirements and quality standards. We therefore expect our suppliers to have an effective quality management system in place.

Our suppliers should continuously improve their processes and train their employees to ensure that all products are



safe and free from harmful substances. Transparency regarding safety and quality is important: relevant information must be disclosed and issues addressed promptly. Together we ensure that products remain safe and reliable.

### **(18) Protection of Personal Data**

The Berentzen Group requires its suppliers to respect privacy rights and to comply with all applicable data protection laws (e.g. the GDPR and the German Federal Data Protection Act). Our suppliers must implement appropriate technical and organisational measures to protect personal data, process data only for specified purposes and prevent unauthorised access.

Data protection violations must be reported to the Berentzen Group without delay and suppliers must cooperate in their investigation.

### **(19) Information Security**

Data processed in information systems must be protected to the best possible extent, but at least in a legally compliant manner. Appropriate technical and organisational measures must be implemented to ensure the confidentiality, integrity and availability of information.

## Compliance and Implementation of the Supplier Code of Conduct

With this Supplier Code of Conduct, we define minimum requirements for suppliers to the Berentzen Group. Suppliers undertake to comply with the minimum standards defined in this Supplier Code of Conduct as well as the applicable national regulations, laws, minimum industry standards and other relevant legal provisions. These take precedence in the event of a conflict with the Supplier Code of Conduct. In the case of temporary employment, it must be ensured that the relevant service provider also complies with these requirements.

Our suppliers must ensure compliance with the minimum standards defined in the Supplier Code of Conduct in a verifiable manner and through appropriate measures, and must review this compliance on a regular basis. Employees must be regularly informed about their rights under the Supplier Code of Conduct. The implementation of the principles described in the Supplier Code of Conduct can be reviewed and documented by conducting independent social audits. If necessary, improvement measures can be derived.

In the event of non-compliance with the Supplier Code of Conduct, the supplier shall initiate improvement measures in a timely manner. We shall allow sufficient time and support for this. If specific violations of the Supplier Code of Conduct become known, the Berentzen Group reserves the right to terminate the business relationship or to have a social audit carried out by a third party at the supplier's premises.

As a matter of principle, supply relationships with new suppliers are only established if they commit to complying with this Supplier Code of Conduct or if the potential supplier has already demonstrably introduced standards or its own codes based on established standards and the Berentzen Group recognises these.

## Entry into Force and Amendments to the Supplier Code of Conduct

The Supplier Code of Conduct will come into effect on January 1, 2026 and will be supplemented by the Code of Conduct and the Marketing Code. All codes are available on the Berentzen Group's corporate website ([www.berentzen-gruppe.de/en](http://www.berentzen-gruppe.de/en)).

## Whistleblower System

The Berentzen Group encourages all business partners to report any violations of applicable law, internal company guidelines or this Supplier Code of Conduct.

To this end, reports can be submitted via the Berentzen Group's digital whistleblower system, which is operated by the independent law firm Schindhelm.

The Berentzen Group's digital whistleblower system can be found at the following link: <https://berentzen.schindhelm-wbsolution.com/> and via the QR code provided.



The Berentzen Group's whistleblower system guarantees the greatest possible protection for whistleblowers who assist in investigating reported misconduct. This includes offering the option of anonymous reporting and communication. The whistleblower system is available in German, English and Turkish, accepts reports in these languages and is available around the clock. All reports are treated as strictly confidential, and whistleblowers will not suffer any disadvantages or reprisals. Even in the case of non-anonymous reports, the identity of the whistleblower is protected and will only be disclosed to persons or authorities involved in the investigation or subsequent legal proceedings if required by applicable law. In the event of reports of plausible and substantiated violations, the group of companies undertakes to take appropriate measures to ensure that the matter is properly investigated.



## INFORMATION ABOUT THE PUBLISHER

---

Berentzen-Gruppe Aktiengesellschaft  
Ritterstraße 7  
49740 Haselünne  
Germany  
T: +49 (0) 5961 502 0  
E: [info@berentzen.de](mailto:info@berentzen.de)  
Internet: [www.berentzen-gruppe.de/en](http://www.berentzen-gruppe.de/en)

Publication date: January 1, 2026





We awaken the **thirst for life.**

We work for the people and  
**society** to experience more  
**liveliness**, fresh **optimism** and  
**joy of life.**

Berentzen-Gruppe Aktiengesellschaft  
Rittterstraße 7  
49740 Haselünne  
Germany  
T: +49 (0) 5961 502 0  
E: [info@berentzen.de](mailto:info@berentzen.de)  
Internet: [www.berentzen-gruppe.de/en](http://www.berentzen-gruppe.de/en)