

Policy Declaration on the Human Rights and Environmental Protection Strategy of bofrost*

For more than 55 years, bofrost* has stood for first-class quality, outstanding service and, above all, personal consultation. The family business founded in 1966, with its headquarters in Straelen on the Lower Rhine River and 251 branches in 12 European countries, is today's market leader in direct sales of ice cream and frozen food specialities. 4.3 million customers, around 2.3 million of which are in Germany, treasure the uninterrupted frozen food distribution channel and the first-class freshness as well as the guarantee of purity and great taste. Important components of the company's philosophy are sustainability, the responsible use of natural resources, and social commitment.

Basic position

As an internationally-active company with complex global supply chains, bofrost* is aware of its social responsibility. Our goal is to strengthen human and environmental rights along the bofrost* supply chains and within our own area of responsibility, and to work with our employees and business partners to ensure fair living and working conditions. Our actions are based on the values recognised and valid in liberal democracies. In doing so, we are guided in particular by the following internationally-applicable standards and guidelines:

- > The United Nations (UN) Universal Declaration of Human Rights
<http://www.un.org/en/documents/udhr>
- > The UN Convention on the Rights of the Child
<http://www2.ohchr.org/english/law/crc.htm>
- > The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises
<http://www.oecd.org/dataoecd/56/36/1922428.pdf>
- > The core labour standards of the International Labour Organization (ILO)
<https://www.ilo.org/berlin/arbeits-und-standards/kernarbeitsnormen/lang--de/index.htm>



Basis of cooperation with employees and business partners

In particular, we apply the requirements of the ILO core labour standards as a minimum standard for cooperation with our business partners. These are anchored with our business partners as a fixed contractual component and set out in writing in our Supplier Code of Conduct.

Respecting and complying with human rights is the basic requirement for any cooperation. The reason for this is that we are interested in long-term partnerships with our upstream suppliers and therefore expect and wish to jointly further the implementation and enforcement of human rights standards in the supply chain. Our employees, who are in close contact with our suppliers and business partners, therefore attend regular training courses with the aim of raising awareness of human rights and environmental risks. All employees receive information on topics such as sustainability, respect for human rights and the commitment bofrost* makes in this regard as part of the onboarding process or in individual meetings with their managers, for example in the framework of the bofrost* Code of Conduct..

Risk analysis and measures

In the context of its business activities, bofrost* carries out regular risk analyses in its own business area, at direct upstream suppliers and also at indirect upstream suppliers if there is a reason for this. These risk analyses involve a company-specific risk classification based on recognised standards, indices and studies, taking account of appropriateness criteria for assessing and identifying risks for human rights and environmental violations.

In particular, countries of origin, raw materials and the type of service are taken into account.

Based on the results of the risk analyses, specific preventive measures are developed to prevent or mitigate human rights risks. At the same time, we are working to continuously improve our risk analyses and also take account of complaints and information that we receive.

In our direct sphere of influence with our business partners, for example, we have established an accreditation process that enables us to identify and minimise human rights risks from the outset. For example, we apply recognised social compliance certifications and pay regular visits to our business partners.

Based on the results of the risk analysis (evaluation of risk focal points in the area of product or raw material procurement or a service) we apply appropriate targets and implement preventive and remedial measures within the framework of our decision-making processes with regard to internal purchasing policy as well as supplier selection. These are individually and directly tailored to the respective starting situation.

We also believe that transparency and knowledge about our supply chains are the foundation for compliance with our human rights due diligence obligations and are therefore continuously working towards developing these.

We are aware that identifying risks and developing effective (preventive) measures is an ongoing challenge. In order to achieve improvements, cooperation with experts, civil society organisations and industry initiatives is essential for us. This is the only way we can master the complex challenges.



Complaint mechanism

Our complaint mechanism for reporting human rights risks or anomalies also plays an important role in our risk management. The freely accessible online reporting system established at bofrost* enables any potentially affected party to anonymously submit confidential information on non-compliance with statutory requirements and/or internal company standards, such as violations of our Code of Conduct or Supplier Code of Conduct. The reporting system is available at <https://www.bofrost.de/compliance.html>. Complaints are documented, checked for admissibility and investigated. Based on the results of the complaint, necessary measures are identified and initiated in the company/supply chain. We continuously use the findings from the complaint mechanism to further develop our risk analysis in order to be able to better identify potential risks in the future and minimise them at an earlier stage.

Reporting

We regularly report to the highest bofrost* decision-making bodies on the status quo and on measures and progress to mitigate human rights and environmental risks and challenges that exist.

Responsibilities

The overall responsibility for implementing and complying with human rights due diligence lies ultimately with the bofrost* management. The operational implementation of human rights due diligence at bofrost* is the responsibility of a working group consisting of the Corporate Social Responsibility Management and the responsible persons from the relevant departments. This working group reports regularly to the bofrost* management.

Straelen, 01.12.2023

The Management
bofrost*Dienstleistungs GmbH & Co. KG

