

bofrost*

The bofrost* Code of Conduct

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Code of Conduct

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I Foreword by the Foundation Board

bofrost* looks back on a successful company history in which we have always been guided by the principles of the „honourable merchant“. These have always been the guiding principles of our entrepreneurial thinking and actions. The resulting value system has shaped and continues to shape the whole company and determines our actions – both at management and employee level.

The values of independence, reliability and cooperation are the cornerstones of the bofrost* company group. For us, independence means remaining successful by offering the best quality and the best service and therefore also remaining economically independent. Always placing our customers at the centre of everything we do and getting new customers excited about bofrost* are at the heart of our success and contribute to this permanent economic independence. By reliability, we mean standing by our customers and colleagues in a trustworthy manner and always offering nothing but the best in everything we do. Alongside all of this, we are committed to working together – both with our customers and internally within the company. We treat one another with mutual trust and encourage an open and respectful relationship – because this is the only way we can jointly achieve challenging goals and be successful.

bofrost* has always been committed to these core values and has become a role model and is influential in the direct sales industry through its consistent implementation of them. Especially in times of social change and corporate transformation, this clear self-image gives both employees and customers direction and stability.

This Code of Conduct is intended to be a guide for the behaviour and daily decisions by bofrost* employees and, in this way, to contribute towards describing the integrity of our behaviour for all bofrost* employees today and in the future, as well as to strengthen the economic independence and satisfaction of all.



Dr. Stephen Weich

Chairman of the Advisory Board
of the bofrost* family business

II Preamble

The trust that our customers, business partners, authorities, the public and other interested parties place in the responsible and lawful behaviour of all employees is of great importance for the reputation and success of our company. This requires all employees to behave in a manner that is based on ethical principles and characterised by a high level of social competence. In order to assist employees with this, managers at bofrost* will inform and actively support them. We also expect our business partners to be guided by ethical principles and to act in accordance with such principles. Responsible and legally compliant behaviour is a matter of course for bofrost*.

This Code of Conduct illustrates the requirements for our behaviour when performing our tasks – in terms of both our external and internal relationships.

Compliance with the laws and regulations of all countries in which we operate is a matter of course for us. We do nothing and refrain from doing anything that would lead to a violation of the law. Even if unlawful behaviour means an advantage for the bofrost* company group, this must not be tolerated. In the case of any doubt, bofrost* would rather forego achieving a goal than violate the law.

Our actions are based on the values recognised and valid in liberal democracies. In our business activities, we observe the following international standards and guidelines in particular:

- **The Universal Declaration of Human Rights of the United Nations (UN)**
www.un.org/en/documents/udhr/
- **The UN Convention on the Rights of the Child**
www.ohchr.org/en/instruments-mechanisms/instruments/convention-rights-child
- **The guidelines of the Organisation for Economic Co-operation and Development (OECD) for Multinational Enterprises**
www.oecd.org/dataoecd/56/36/1922428.pdf
- **The core labour standards of the International Labour Organisation (ILO)**
www.ilo.org/declaration/thedeclaration/textdeclaration/lang--en/index.htm

We recognise that the ethical standards reflected in local regulations vary from country to country. Should the regulations of this Code of Conduct or international legal provisions and conventions differ from local regulations, the stricter regulation always applies.

It is not possible to foresee every individual case or every situation. The Code is necessarily broad and general in nature. It is not intended to replace detailed regulations or procedural instructions. Rather, by naming the core elements of individual and corporate responsibility, it is intended to provide all employees and managers with a clear understanding of the principles and ethical values that apply at bofrost*.

You should always be able to answer „yes“ to the following questions as a guide in order to determine whether you are acting correctly in accordance with the bofrost* Code of Conduct::

- **Are my actions fair and honest?**
- **Are my actions in line with the law and company policy?**
- **Are my actions in the best interests of the company?**
- **Can I proudly tell others about what I do?**
- **Would my actions trigger a positive response in the public sphere (social media, radio and television)?**
- **Do my actions contribute to bofrost* being perceived as a trustworthy company?**

III The basic rules of behaviour

Duties and responsibilities of employees and managers

In the course of their work, all employees are responsible to the best of their knowledge and belief for compliance with the law. Managers act as role models for all employees and credibly live and work by the bofrost* Code of Conduct. They also ensure that all employees are aware of the Code of Conduct and that the requirements it sets are met.

Remuneration of the Board

The remuneration of the Board consists of a fixed and a variable component. The amount of variable remuneration is also geared towards the sustainable success of the company and is determined on the basis of the company's situation and the success of projects and processes.

Fair competition

bofrost* always treats its customers, suppliers and competitors with the utmost respect. The laws are a minimum standard for us. In addition, we are guided by international industry standards that contribute to respectful competition.

The following also applies as a matter of in principle:

- Discussions or agreements that have as their object or effect a restriction of competition that is critical under competition law are prohibited.
- No benefits may be offered to a third party in connection with the business activity, either as monetary payments or in the form of other services. This applies regardless of local customs and traditions.

III
The basic rules
of behaviour

Corruption and granting of advantages

Corruption and the granting of advantages – in whatever form – are not tolerated at bofrost*.

No personal advantages may be requested, accepted, offered or granted in connection with our day-to-day cooperation with suppliers, customers or other partners. If an employee is confronted with such an offer or request, they must report this to their line manager immediately.

Gifts and invitations may only be accepted in exceptional cases and if their value is low. For bofrost*, the principle applies that all employees contribute to bofrost*'s success. Therefore, such invitations and gifts must be made available to employees (tombola, company party, etc.).

In the event of any doubt, it is essential to clarify this with the line manager.

Data protection

For us, data protection starts at the customer's front door. In discussions with customers, we are also entrusted with information that lies outside the bofrost* business. That is why it goes without saying that we only talk to our customers and not about our customers. Compliance with international data protection regulations is mandatory for us. Data required for customer support are only stored for internal purposes. Selling customer data to third parties is excluded. We also place our business partners under an obligation to handle personal data responsibly.

Product and occupational safety

Avoiding and safely controlling hazards for employees and customers is an essential part of responsible behaviour. This applies to all areas of our company, in particular product development, production and product monitoring. The trade-off between product development and production costs on the one hand and product safety on the other must always be in favour of product safety. Compliance with all food law requirements is mandatory.

Occupational safety regulations must be complied with in the employee's own interest, but also in the interest of their colleagues and the company as a whole. It is in our interest that our employees come to work healthy and return home healthy. All departments have therefore developed various safety programmes and emergency plans.

All employees are thoroughly trained and instructed in this regard.

Our business partners in Germany and abroad are also required to carefully follow safety regulations – regardless of whether they are prescribed by law, issued by the responsible authorities or regulated in company guidelines.

Environmental responsibility

Environmentally conscious behaviour is a matter of course for us. For us, the legal requirements are merely a minimum standard. Our aim is to create a „win-win“ for the environment and the company wherever possible.

All bofrost* employees are required to work towards this goal.

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The basic rules
of behaviour

Social responsibility

Respect for human rights is a fundamental principle of all human coexistence. We are guided by the core labour standards of the ILO (International Labour Organisation). Working conditions that violate such rights and standards are contrary to this principle. This applies both internally at our company as well as with regard to our cooperation with business partners. Every employee is responsible for ensuring that human rights and basic labour rights are not violated within their area of responsibility and influence.

Prohibition on discrimination

All employees have the right to be treated fairly, politely and respectfully by their line managers and colleagues. No one may be discriminated against on grounds of race and ethnic origin, gender, language, age, religion, political and ideological convictions, national or social origin, sexual orientation or other personal characteristics. All bofrost* employees have a duty to respect the personal dignity and sphere of other employees. For bofrost*, bullying is also a form of discrimination and will not be tolerated. Harassment and any form of unwanted physical contact is prohibited.

Protection of company property and trade secrets

bofrost*'s property may only be used for business purposes. Office and work materials, product samples and bofrost* products are also company property. Business secrets and other sensitive information must be treated confidentially and protected from disclosure to unauthorised persons. Every employee has a duty to treat bofrost* property responsibly. Company property may not be used for private purposes or removed from company premises without the express consent of the responsible department. Intangible assets such as internal company knowledge are also part of the company's property.

Dealing with conflicts of interest

Within the scope of their official duties, each employee exclusively represents the interests of bofrost*. If an employee is facing a significant conflict of interest between their personal interests and those of bofrost*, they must inform their line manager immediately (e.g. existing family relationship with a bofrost* supplier). Conflicts of interest can also arise between companies in the bofrost* company group. The Steering Committee is responsible for resolving such conflicts of interest for the bofrost* company group. In principle, contracts between companies belonging to the bofrost* company group must be concluded as they would if they were being agreed with an independent third party.

Private activity (in a professional context)

All employees must inform their line manager or the relevant HR department of their intention to accept a position in another company or to become actively involved in business activities. This especially applies to assuming functions at competitors, production and cooperation partners.

III
The basic rules
of behaviour

Legally compliant, complete and truthful accounting

Assets or funds of bofrost* may only be used and transactions may only be carried out if the respective transactions are properly accounted for and documented. In doing so, we comply with the applicable statutory provisions.

All entries in bofrost*'s books and records must be true, complete and accurate. Money transfers may only be carried out in the interest of bofrost*. The „four-eyes principle“ ensures that no important process is left unreviewed.

Economical use of company resources

The responsible use of company resources is a matter of course.

Each time resources are used, it must be checked whether such use is in the interest of bofrost*.

If different solutions are conceivable and equivalent, the more resource-efficient option should be chosen.

Relationships with public institutions and authorities

As a food company, bofrost* has to comply with numerous rules and regulations. Relevant documents must be provided in good time in the event of enquiries by the authority. Funding applied for/received will only be used for the purpose for which it was applied for/received. Relationships with public institutions and authorities are characterised by trust, clarity and correctness. However, in order to protect the interests of bofrost* in the event of any doubt, the line manager must be contacted at an early stage.

Ambassadors of the company

Every bofrost* employee is perceived as being a representative of the company. With their appearance, every employee contributes to a positive image and therefore promotes the success of the company and of all bofrost* employees. All employees must be aware of this at all times. Compliance with ethical and legal principles is a matter of course for every bofrost* employee. Behaviour that damages our reputation, both in terms of our internal and external relationships, will not be tolerated. Our social media guidelines provide information on correct behaviour on the internet and on social networks.

IV Validity and implementation of this Code

All employees at all levels of the bofrost* company group have a duty to comply with the rules of this Code in the course of their work.

Violations of the bofrost* Code of Conduct

Violations of the bofrost* Code of Conduct can have far-reaching consequences for the entire bofrost* company group and can therefore result in corresponding measures being taken. Every employee is therefore entitled and encouraged to report possible violations of this Code of Conduct or the guidelines applicable at bofrost*. No employee may suffer a disadvantage as a result of reporting a possible violation in good faith.

If behaviour or a specific situation is observed that may constitute a violation of the bofrost* Code of Conduct, employees can report it, for example via the bofrost* reporting platform (<https://www.bofrost.de/compliance.html>) anonymously, or contact the following persons or bodies in confidence:

- Line manager
- Works council
- Representative body for severely disabled persons
- Youth & trainee representation body
- Occupational safety specialist
- Company doctor
- Directors and employees
- Advisory board of the bofrost* family business
- Board of the bofrost*Foundation

bofrost* and the aforementioned persons or bodies undertake to maintain confidentiality when investigating reported/possible violations. The reporting party's data will only be passed on if the reporting party has expressly granted their consent.

Further information is available at:

<https://www.bofrost.de/compliance.html>