



## CODE OF CONDUCT FOR BUSINESS PARTNERS

The Paulaner Brewery Group attaches great importance to compliance with all national and international legal regulations and to a responsible and long-term value creation chain.

In this regard, this Code of Conduct for Business Partners describes the fundamental principles for our own business activities and cooperation with our business partners. These represent the minimum standards for our business relationships.

The Code of Conduct is based, among other things, on the international guiding principles and guidelines listed below:

- Universal Declaration of Human Rights (UDHR)
- United Nations Global Compact (UNGC)
- UN Guiding Principles on Business and Human Rights
- OECD Guidelines for Multinational Enterprises
- Core labour standards of the International Labour Organisation (ILO)

We comply with these international guiding principles and guidelines as well as with local, national and international laws and regulations. We also require our business partners to comply in their activities with the applicable national laws and regulations and the principles and ethics contained in this Code of Conduct.

In its business and procurement activities, the Paulaner Brewery Group also pays attention to social and ecological aspects such as human rights, working conditions and environmental protection, in addition to economic and technical criteria. When purchasing goods, raw materials and services, the Paulaner Brewery Group therefore expects its business partners to adopt a sustainable approach, protect the environment, treat employees fairly and observe health protection and occupational safety.

The Paulaner Brewery Group has implemented processes that support compliance with applicable laws in the company and promote continuous improvement with regard to compliance with laws and human and environmental rights. We also demand this from our business partners.

### Human and workers' rights

The Paulaner Brewery Group complies with the applicable human and workers' rights in its companies and expects its business partners to do the same.

National regulations as well as international standards for the protection of minors must be complied with. The Paulaner Brewery Group requires that any kind of child labour is refrained from and prohibited. Where national laws or regulations permit children between the ages of 13 and 15 to perform light work, this must not be permitted under any circumstances if it prevents minors from complying with compulsory education or training.

Any form of discrimination in the recruitment of workers as well as in promotion or the granting of training and further education measures shall be prevented. No employee shall be discriminated against because of age, gender, sexual orientation,





pregnancy, disability, nationality, ethnic origin, skin colour, religion or belief, political opinion, social background or marital status. Equal opportunities and equal treatment are to be promoted.

The Paulaner Brewery Group condemns any form of forced labour or corporal punishment and also requires its business partners to refrain from this.

In accordance with national legislation, the Paulaner Brewery Group respects the rights of employees to freedom of association, i.e. the right to form employee representation and to bargain collectively. Under no circumstances may the assertion of these rights be punished with reprisals. We also expect this from our business partners.

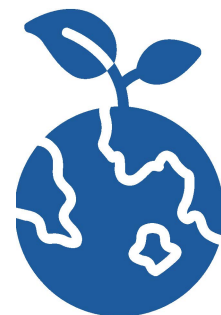
The Paulaner Brewery Group complies with the respective applicable national legislation on remuneration and working hours and also obliges its business partners to comply with these regulations. This obligation also includes, in particular, compliance with the agreed collective agreements and the respective statutory minimum wages.

The Paulaner Brewery Group complies with health protection and occupational safety regulations in its operations. Business partners of the Paulaner Brewery Group also undertake to comply with the respective applicable national legislation on health protection and occupational safety and to ensure a safe working environment.

## Environment

The Paulaner Brewery Group aims to use environmental resources as sparingly as possible, to reduce environmental pollution and to avoid hazards to people and the environment. The Eco-Management and Audit Scheme (EMAS) is the world's most demanding system for sustainable environmental management. All locations of the Paulaner Brewery Group have been awarded the EMAS III certificate.

We comply with the respective applicable national environmental laws, regulations and standards on environmental protection and expect our business partners to do the same.



## Product safety

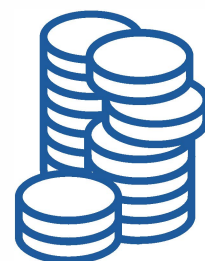
The Paulaner Brewery Group requires that its business partners comply with the applicable product safety regulations.





## Behaviour in the business environment

The Paulaner Brewery Group pays attention to the prevention of corruption and also expects correct behaviour from business partners in the business environment. In addition to compliance with the provisions of antitrust and competition law, this includes, in particular, observance of the regulations on the prevention of corruption and bribery and money laundering.



## Applicability to the business partners' own business relationships

Business partners of the Paulaner Brewery Group undertake to observe the principles and requirements described here in their supply chain and also to take them into account when selecting business partners.

Business partners shall ensure that subcontractors and suppliers comply with the described standards for compliance with laws, human rights, working conditions and environmental protection as part of the fulfilment of their contractual obligations.

## Notification of infringements and duty to cooperate

The business partner shall enable the Paulaner Brewery Group to verify compliance with the Code of Conduct and shall cooperate in clarification measures regarding a violation or the reasonable suspicion of violations of the principles and requirements of this Code of Conduct for Business Partners. For this purpose, it shall provide information in response to enquiries at least in writing.

If the business partner obtains indications of a not insignificant breach of this Code of Conduct, it must report this immediately. It is possible to report violations at the email address [compliance@paulaner.de](mailto:compliance@paulaner.de) or in our whistleblowing system [www.bkms-system.com/paulaner-gruppe](http://www.bkms-system.com/paulaner-gruppe).



## Remedial measures

In the event of a breach of legal human rights or environmental obligations, the business partner undertakes to plan and take appropriate remedial measures, together with the Paulaner Brewery Group, that are suitable for preventing, ending or minimising a breach. In such cases, the business partner shall immediately inform the Paulaner Brewery Group of its knowledge.

In the event of repeated or serious violations, the contractual relationship may be terminated. Further rights, in particular a possible claim for damages, remain unaffected by this.