
Code of Conduct Frießinger Mühle GmbH and business partners

(Revision 1.6 of 09.08.2024)

Table of contents

1.	Introduction	2
2.	Our principles.....	3
2.1	Foreign trade law requirements.....	3
2.2	Human rights.....	3
2.3	Obligation to report human rights violations.....	3
2.4	Respectful cooperation	3
3.	Integrity and fair competition.....	3
4.	Corruption prevention	3
5.	Conflicts.....	3
6.	Environmental protection.....	3
6.1	Ecological responsibility.....	4
6.2	Handling of waste and hazardous substances.....	4
6.3	Eco-friendly packaging.....	4
6.4	Dealing with energy consumption/efficiency.....	4
6.5	Deforestation-free supply chains	4
7.	Human rights-related protected interests	4
7.1	Fair pay	4
7.2	Occupational safety / protection.....	5
7.3	Discrimination.....	5
7.4	Exclusion of forced labour.....	5
7.5	Prohibition of child labour	5
7.6	Freedom of association and association	5
7.7	Grievance mechanisms.....	6
8.	Privacy.....	6
9.	Compliance with the Code of Conduct.....	6
9.1	Conducting audits.....	6
9.2	Information regarding a risk analysis.....	6
9.3	Consequences of non-compliance	6
10.	Contact	7

1. Introduction

In the further course of this Code of Conduct, we will refrain from gendering for easier readability.

We at Frießinger Mühle GmbH want to be a trustworthy and reliable business partner. Frießinger Mühle strives for transparent and sustainable business practices in which our business partners are treated honestly, fairly and responsibly. In this respect, we as authors adhere to all the points mentioned in this code.

When selecting our business partners, we make sure that they comply with the law in their business practices. We expect this to be the basis for a long-term, trusting cooperation!

Our Code of Conduct for Business Partners is therefore an important basis for our business relationships. It obliges our business partners to comply with those legal standards that are a matter of course for us in the context of our business activities. The Code of Conduct is based, among other things, on the principles of the UN Global Compact and thus obliges our business partners to adhere to the same principles to which we have committed ourselves and with which our managing directors, managers and all employees shape the corporate culture of Frießinger Mühle.

Business partners are all third parties who act for, on behalf of, or together with Frießinger Mühle.

These include, for example, suppliers, sales partners, subcontractors and sales representatives.

We would like to thank all business partners who, together with Frießinger Mühle, are committed to responsible, fair business practices.



Willi Frießinger Jun. (CEO)



Lisa Frießinger (HR)

2. Our principles

It goes without saying that we comply with the laws, ordinances and comparable regulations to which we as Frießinger Mühle are subject in the course of our business activities. We are committed to a sustainable, value-oriented corporate culture and expect the same from our business partners.

2.1 Foreign trade law requirements

A large number of national and international laws regulate the import, export or domestic trade of goods, technologies or services, the handling of certain products as well as the movement of capital and payments. Our contractual partners take appropriate measures to ensure that they comply with current economic embargoes or trade regulations, import and export regulations or regulations on combating the financing of terrorism.

2.2 Human rights

Our business partners respect internationally recognized human rights and fundamental freedoms in accordance with the principles set out in the UN Global Compact. It is a matter of course for our contractual partners to protect and promote human rights in the long term through their corporate culture and business policy. Child labour and forced labour, as well as any form of modern slavery and human trafficking, will not be tolerated.

2.3 Obligation to report human rights violations

The Supplier is obliged to report any violations of human rights-related protected interests immediately. The taking of remedial measures to prevent further injuries or to minimise existing injuries is also incumbent on his duties. With regard to the upstream supply chain, the reporting obligation applies in the same way.

2.4 Respectful cooperation

A supporting pillar of Frießinger Mühle is the good corporate culture full of respect, tolerance and trust. Every individual has the right to respectful coexistence, free from any kind of discrimination. Our business partners also promote diversity in their companies and do not tolerate discrimination or disadvantage against employees, customers and business partners.

3. Integrity and fair competition

We base our actions on generally applicable ethical values and principles, in particular integrity, integrity, respect for human dignity, openness and non-discrimination of religion, ideology, gender or ethnicity. Frießinger Mühle wants to convince its customers and business partners with competence in free and unhindered competition. We expect our business partners to act in an adequately fair and responsible manner.

4. Corruption prevention

For us, all forms of corruption and bribery contradict our commitment to integrity and sustainably violate the trust of our customers and business partners. Any form of bribery and corruption is therefore prohibited at the Frießinger Mühle. Our business partners also do not tolerate any form of corruption. As part of the mutual management of our business relationship, both sides have the same understanding of how to deal with invitations and gifts. These benefits must never be used to gain unfair advantages.

5. Conflicts

For each business partner, situations can arise in which his interests are in conflict with those of Frießinger Mühle. Such conflicts of interest must be avoided. Business partners who are affected by a conflict of interest must disclose and resolve it.

6. Environmental protection

At Frießinger Mühle, we are already thinking about tomorrow today and are committed to the careful use of natural resources. It is a matter of course for us to consistently apply and observe all legal provisions, as well as regulations, guidelines and other obligations that serve to protect the environment. We expect our

partners to comply with all environmental protection regulations relevant to them and to include environmental aspects in business decisions. In order to comply with the Supply Chain Due Diligence Act, our business partners undertake, for example, to provide the names and addresses of direct upstream suppliers on request.

6.1 Ecological responsibility

Wastewater from operating procedures, manufacturing processes and sanitary facilities must be typed, monitored, checked and, if necessary, treated before discharge or disposal. In addition, measures should be introduced to reduce the generation of wastewater. The use and consumption of resources during production and the generation of waste of all kinds, including water and energy, must be reduced or avoided.

6.2 Handling of waste and hazardous substances

The supplier follows a systematic approach to identify, handle, reduce, and responsibly dispose of or recycle solid waste. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989 in the current version must be observed. Chemicals or other materials that pose a risk when released into the environment must be identified, labelled and handled in such a way as to ensure safety during the handling, transport, storage, use, recycling or reuse and disposal of such substances. Mercury must be used in accordance with the prohibitions of the Minimata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001 as amended.

6.3 Eco-friendly packaging

The supplier should always strive to integrate and promote environmentally friendly packaging into its business process. This includes reusable packaging that is recyclable to generate and promote. The entire portfolio of primary and secondary packaging as well as labels must be taken into account. The use of recyclable additional packaging should be used. The goal should be to make 100% of packaging recyclable.

6.4 Dealing with energy consumption/efficiency

Energy consumption must be monitored and documented. Economical solutions must be found to improve energy efficiency and minimise energy consumption.

6.5 Deforestation-free supply chains

In accordance with the EU Deforestation Regulation (EUDR), the supplier ensures demonstrably guaranteed deforestation freedom and compliance with related local laws along the entire supply chain. Recorded measures to prevent deforestation in the respective production area must be documented and presented on request.

Based on this, every supplier must respect the prevailing land rights. Any unlawful deprivation of forests, waters and land, as well as any unlawful forced eviction that secures the livelihood of one or more persons through use (especially in the case of acquisition or development), is to be refrained from.

7. Human rights-related protected interests

By complying with the laws and regulations on health and safety at work, we as Frießinger Mühle but also our business partners express that the safety and health of each individual has top priority. The preservation of natural resources, the preservation of human dignity, the preservation of basic human needs and clean drinking water, sanitary facilities, etc., are taken for granted.

7.1 Fair pay

Remuneration for regular working hours and overtime must be in line with the national statutory minimum wage or industry minimum standards, whichever is higher. In any case, the remuneration for overtime must reach or exceed the remuneration for regular hours. The aim is to pay wages and other benefits that cover the cost of living, insofar as the statutory minimum wages are too low for this. Employees must be granted all the benefits required by law. Wage deductions as punitive

measures are not permitted. The supplier shall ensure that workers receive clear, detailed and regular written information on the composition of their remuneration.

The working hours of all employees are based on the legally permitted working hours and do not exceed them. Any kind of overtime must be remunerated separately or compensated for by time off in accordance with national law. All employees are entitled to at least one day off after six consecutive working days.

We would like to point out in this regard. ILO Conventions 26 and 131. The minimum standard is § 2 para. 2 no. 8 LkSG.

7.2 Occupational safety / protection

Our business partners consider it their duty to ensure a healthy and risk-free working environment. Compliance with the local safety standards and protective measures laid down by law must be ensured if this results in work-related health hazards / risk of accidents.

7.3 Discrimination

The unequal treatment of employees in any form is inadmissible unless it is based on the requirements of employment. This applies, for example, to discrimination based on gender, national, ethnic or social origin, skin colour, disability, health status, political opinion, ideology, religion, age, pregnancy or sexual orientation. The supplier is responsible for a safe and healthy working environment. By setting up and applying appropriate occupational safety systems, necessary precautionary measures are taken against accidents and damage to health that may occur in connection with the activity. Excessive physical or mental fatigue must be prevented by appropriate measures. In addition, employees are regularly informed and trained about applicable health and safety standards as well as safety measures. Employees are given access to drinking water in sufficient quantities as well as access to clean sanitary facilities. We would like to point out in this regard. ILO Conventions 155 and 164 and § 2 (2) no. 5 LkSG.

7.4 Exclusion of forced labour

No forced labor, slave labor or similar work may be used. All work must be voluntary and carried out without threat of punishment. Employees must be able to terminate work or employment at any time. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. We would like to point out in this regard. ILO Conventions 29 and 105 and the fourth principle of the Global Compact ("Companies should advocate the elimination of all forms of forced labour") and § 2 para. 2 nos. 3, 4, 11 LkSG.

7.5 Prohibition of child labour

Child labour may not be used at any stage of production. Suppliers are required to comply with the recommendation of the ILO conventions on the minimum age for the employment of children. According to this, the age should not be less than the age at which compulsory schooling ends under the law of the place of employment and in any case not less than 15 years. If children are found at work, the supplier must document the measures to be taken to remedy the situation and enable the children to attend school. The rights of young workers under the age of 18 may not be used for work that is harmful to the health, safety or morals of children. Special protective regulations must be observed. We would like to point out in this regard. ILO Conventions 79, 138, 142 and 182 or the fifth principle of the Global Compact ("Companies should advocate the abolition of child labour") or § 2 paras. 1, 2 LkSG.

7.6 Freedom of association and association

The right of workers to form and join organisations of their choice and to bargain collectively and strike must be respected. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative possibilities for independent and free association of employees for the purpose of collective bargaining must be granted. Employees shall not be discriminated against on the basis of formation, membership or membership in such an organisation.

Workers' representatives should be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner. We would like to point out in this regard. refers to ILO Conventions 87, 98, 135, 154 or the third principle of the Global Compact

("Companies should uphold freedom of association and the effective recognition of the right to collective bargaining") or Section 2 (2) No. 6 LkSG.

7.7 Grievance mechanisms

The supplier must pass on to its employees in an appropriate manner any information received from its company regarding accessibility, responsibility and the implementation of a complaint procedure. The grievance procedure must be accessible to employees while respecting the confidentiality of identity and effective protection against discrimination. Unless indicated, the supplier itself is responsible at the establishment level of an effective grievance mechanism for individuals and communities that may be affected by adverse impacts.

In accordance with the requirements of the LkSG, we have also established an independent complaints procedure in our corporate structure. This makes it possible for both internal and external stakeholders to report anonymously if they suspect / know about an affected human rights or environmental protection violation. The complaint procedure can be initiated via our compliance hotline: compliance@friessinger-muehle.de.

8. Privacy

The collection, storage, processing and transfer of personal data is subject to special data protection regulations. In order to ensure the special protection of privacy, our business partners observe the applicable laws on the protection of personal data.

9. Compliance with the Code of Conduct

Our business partners ensure that the principles set out in this Code of Conduct are adhered to and brought to life in their company. They ensure that the minimum standards defined here are met in the contractual relationship with the Frießinger Mühle. The principles of this Code of Conduct are to be adhered to throughout the value chain. Our business partners therefore carefully select contractual partners whom they in turn commission in the course of their work for Frießinger Mühle, inform them about the principles of the Code of Conduct and are committed to ensuring that the principles are also observed by their contractual partners.

9.1 Conducting audits

In order to ensure compliance with the Code of Conduct, Frießinger Mühle reserves the right to carry out risk-based audits on site to an appropriate extent. These can be carried out either independently by means of a personal inspection on site or on behalf of a third party who is obliged to maintain confidentiality. In doing so, all data protection regulations as well as any business or trade secrets of the supplier are protected.

9.2 Information regarding a risk analysis

In the event of a required risk analysis vis-à-vis third parties, the supplier is obliged to provide all necessary data for the preparation of such a risk analysis. Should a risk affect the business activities with Frießinger Mühle, the supplier has the obligation to report the risk, to take and implement preventive measures to mitigate/eliminate the risk.

9.3 Consequences of non-compliance

Frießinger Mühle cultivates a culture of cooperative partnership with its business partners. If there is a suspicion of a violation of this Code of Conduct, our business partners support Frießinger Mühle in clarifying the facts. In the event of violations of the Code of Conduct, Frießinger Mühle reserves the right to react appropriately, which depends on the severity of the violation. This includes, in particular, but not exclusively, the request for immediate remedy of the violation, the assertion of damages or the termination of the contract. In the event of very serious violations of the Code of Conduct, Frießinger Mühle reserves the right to terminate the contract for extraordinary reasons.

10. Contact

The provisions of this Code of Conduct also apply to the entire operation of Frießinger Mühle GmbH, as well as to our suppliers and other persons who maintain a business relationship with us. A violation of the Code of Conduct can lead to consequences under employment law for all employees, i.e. also for managers. Employees are entitled and encouraged to report violations of this Code of Conduct.

We, Frießinger Mühle GmbH, promote an open and honest feedback culture in which questions and concerns can always be addressed openly. Critical questions, concerns and complaints are always listened to by us. We ensure that all reported concerns are investigated. We will strive for appropriate remedy by the responsible body and will not tolerate any retaliation against anyone who makes a complaint in good faith.

For general questions about this Code of Conduct or if you are unsure about how to deal with the principles, please contact your responsible contact person at Frießinger Mühle. The e-mail address compliance@friessinger-muehle.de is also available as a central place for questions and suggestions.

I / we have taken note of the above-mentioned Code of Conduct of Frießinger Mühle.

We are committed to complying with the requirements listed therein - if necessary also vis-à-vis our business partners and subcontractors. As a supplier, we undertake to communicate the content of this Code with employees, agents and subcontractors and to take all necessary precautions for the implementation of the requirements.

Date, Signature Business Partner