



Lübecker Marzipan-Fabrik v. Minden & Bruhns GmbH & Co. KG

## Code of Conduct

Lubeca, the Lübecker Marzipan-Fabrik v. Minden & Bruhns GmbH & Co. KG, is a manufacturer of marzipan almond and pistachio paste, nougat praline pastes, chocolate couvertures, as well as processed almond and hazelnut products for further processing. All Lubeca products are manufactured in accordance with the highest quality and product safety standards and therefore meet all applicable regulations and specifications.

This Code of Conduct forms the framework for long-term and trustworthy business relationships. Compliance with national and international legal requirements is the key principle of all Lubeca's business activities and developments and is part of Lubeca's corporate strategy. This Code of Conduct sets out our commitment regarding behaviour of all the employees, managers and business partners, such as suppliers, customers and service providers. Lubeca requires all its business partners throughout the supply chain to comply with these principles. These commitments are essential for all Lubeca's delivery and service contracts and constitute a non-negotiable minimum standard.

Lubeca expects its suppliers to comply with all applicable legal requirements at national and international level. UN Guiding Principles on Business and Human Rights as well as Conventions of the International Labour Organization (ILO) form the elemental basis.

Sustainable corporate governance has characterized the business activities of Lubeca for more than 100 years. The company is wholly owned by the non-profit Friedrich Bluhme and Else Jebesen Foundation. Company's profits are used to support charitable, non-profit and cultural initiatives in the Luebeck region.

### Health and safety

Health and safety must be given top priority both at the workplace and in the working environment of employees. The relevant obligations under local employment laws must be observed. Lubeca makes every effort to ensure that workplace and its surroundings do not endanger physical integrity or health. The company's goal is to prevent accidents and continuously improve working conditions through appropriate measures such as training. Lubeca employees are encouraged to report accidents and safety concerns.

### Child labour

Lubeca is committed to strengthen children's rights and aims to eliminate child labour in the extended supply chain. Suppliers and contractual partners are required to comply with the ILO Conventions on the minimum age for admission to employment and the maximum limit on working hours (ILO Conventions 138 and 182). Children should be prevented from harmful or hazardous influences which endanger their development.

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Handelsregister Bad Schwartau HRA 846 · PHG: Jebesen & Co. GmbH · Handelsregister Bad Schwartau HRB 1535

Geschäftsführer: Balthas Klein, Vorsitz; Sandra Mumme, Vertrieb & Marketing



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## Forced labour

All forms of forced and compulsory labour are prohibited in accordance with ILO Conventions 29 and 105. Furthermore, it is prohibited to withhold compensation, property or documents from employees in order to force them to work. All work must be carried by persons which have offered themselves voluntarily and not under the threat of a penalty.

## Working hours

Lubeca complies with the applicable legal restrictions on working hours. The maximum permitted working hours per week are regulated by national laws in accordance with the Conventions of the International Labour Organization (ILO). Overtime limitations are governed by applicable national and contractual obligations. Lubeca ensures that employees take the necessary rest breaks so as not to jeopardize their health and safety. Lubeca treats Work life balance with highest priority. Working hours must comply with national legal requirement.

## Fair remuneration

Wages, salaries and social benefits must comply with the legal or collectively agreed standards and should enable an appropriate standard of living. Remuneration must be paid in a timely manner and at regular intervals.

## Prohibition of discrimination and harassment

The personal dignity, privacy and personal rights of each individual must be respected. Discrimination and harassment of any kind are unacceptable and must be prevented. Lubeca does not tolerate unfair treatment based on gender, origin, language, religion, sexual orientation, political views or discrimination against people with handicap.

## Environment and sustainability

Every business activity must consider the protection of nature and the environment. We are committed to our responsibility for environmentally friendly and resource-conserving corporate management. This is based on national and international legislation and guidelines. Environmental awareness and sustainability efforts in the supply chain should be promoted. We strive to make conscious use of water and energy resources, taking care to minimize the use of energy, air emissions, wastewater and waste in our business activities and the supply chain.



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### Freedom of association and right to collective bargaining

Lubeca respects their employees' right to freedom of association and to join labour associations (trade unions and membership in works councils). The exercise of these rights must not have any negative consequences for employees and their representatives. Employees must be able to communicate openly with management without fear of reprisals.

### Business integrity

Lubeca does not tolerate corruption, extortion or embezzlement in any form. Business relationships with our suppliers, customers and service providers are based solely on objective criteria such as quality, competitive prices, delivery reliability as well as social and environmental standards.

### Data protection

Lubeca takes all necessary precautions to ensure the confidentiality of information and its use in compliance with regulations.

### Compliance and implementation

The company, its employees, managers and all business partners such as suppliers, customers and service provider are responsible for compliance with this Code of Conduct.

Violations of this Code of Conduct should be reported throughout grievance channel. Notifications and grievances can be submitted personally, by post or by email to [notice@lubeca-marzipan.de](mailto:notice@lubeca-marzipan.de). Anonymous grievance is also accepted. Your information will be kept and treated as confidential.

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