



Inspire change.  
Create trust.  
Add value.

CODE OF CONDUCT



# CODE OF CONDUCT

The Code of Conduct defines the principles that guide our professional activities and behaviour. It provides guidance for how we as employees should behave in order to ensure the integrity of BRITA.



# Contents

 <b>1</b>	<b>FIRST AND FOREMOST: WE ABIDE BY THE LAW</b>	<b>05</b>
 <b>2</b>	<b>HOW WE SHOW RESPONSIBILITY FOR PEOPLE AND THE ENVIRONMENT</b> Human rights, labour and social standards Respectful and fair treatment Standards for health and safety in the workplace Protecting the environment	<b>06</b>
 <b>3</b>	<b>HOW WE CONDUCT OUR BUSINESS</b> Avoiding conflicts of interest Zero tolerance for corruption, bribery, extortion or embezzlement No undue influence on competition No involvement in money laundering or terrorist financing Compliance with export control regulations Proper accounting and fulfilment of tax and customs obligations Responsible communication Protecting confidential information Careful treatment of BRITA property and resources	<b>10</b>
 <b>4</b>	<b>HOW WE HANDLE IT SYSTEMS AND PERSONAL DATA</b> Securing IT systems Protecting personal data	<b>19</b>
 <b>5</b>	<b>HOW WE DEAL WITH REPORTS OF COMPLIANCE VIOLATIONS AND PROTECTION OF WHISTLEBLOWERS</b> Reporting of and dealing with compliance violations Protecting whistleblowers	<b>21</b>
	<b>CONTACT INFORMATION</b>	<b>24</b>



### Dear BRITA family,

At BRITA, we believe that trust is the foundation of our corporate success. And in a world that is constantly evolving, we trust in you - to ensure that integral, ethical and value-driven behaviour remains an essential part of our company culture. Because compliance with the law and ethical behaviour in everything we do is essential to sustain the reputation of the BRITA Group.

This Code of Conduct forms the cornerstone of our BRITA Compliance Programme. It defines the principles that guide our professional activities and behaviour. It is binding for all employees at all hierarchical levels and the executive bodies of all BRITA locations around the world without any exception. BRITA executives and managers are required to ensure that their employees strictly abide by the BRITA Code of Conduct. And we expect them to set an example by actively applying and communicating

the principles of this document. Why? Because compliance breaches can have significant consequences, both financial and possibly under criminal law - for BRITA and for the individuals involved. They can also cause lasting damage to the reputation of the entire BRITA Group.

Therefore, adhering to compliance requirements protects all of us. So please: familiarise yourself with the contents of this Code of Conduct and the associated policies. We value a work environment in which employees openly address compliance issues and discuss them, both with their line managers and the compliance organisation. Our aim is to ensure that all employees are sensitised to compliance in their day-to-day work through sustained communication. If you become aware of compliance breaches, there are various reporting options. Make use of them! We will respond in a rigorous and appropriate

manner to any compliance breaches that have been identified in order to protect BRITA and our employees.

Always base the way you behave on the spirit and purpose of the Code of Conduct and use your sound judgement. Compliance starts with each of us. You individually and all of us together are responsible for how we do business at BRITA. And for ensuring that BRITA continues to be viewed as a company that operates with integrity, moral rigour and in compliance with the law. Because: Wir sind BRITA. A global family.

**Thank you.**



**Markus Hankammer**  
Chief Executive Officer  
BRITA Group

*From left to right:  
Stefan Jonitz,  
Markus Hankammer,  
Dr. Rüdiger Kraege*

**Stefan Jonitz**  
Chief Financial Officer  
BRITA Group

**Dr. Rüdiger Kraege**  
Chief Commercial Officer  
Professional Filter/Dispenser  
BRITA Group



## First and foremost: We abide by the law

**The basis of ethical and moral behaviour is acting within the law. We comply with all applicable laws, both domestic and foreign, in all of our business decisions and actions. We reject any unfair commercial practices.**

Sustainable business relationships for the benefit of all parties can only exist if there is fair competition and strict compliance with the law. Corruption, collusion among competitors, embezzlement and fraud, and similar legal violations distort competition. They lead to higher costs and can be associated with significant penalties and reputational damage. Ultimately they also jeopardise jobs at BRITA.

**What does this mean for all of us working at BRITA?**

- We are aware of and comply with all applicable rules and regulations, including this Code of Conduct and the applicable policies.
- We comply with applicable laws and regulations, regardless of whether compliance is checked by the respective local authorities, or if local customs differ from the standards in our Code of Conduct.
- We evaluate all professional conduct to determine whether it complies with the Code of Conduct, company policies and all applicable laws and regulations.
- In case the provisions of this Code of Conduct or international regulations and conventions differ from local regulations, the more stringent regulations shall always apply.

**At BRITA, we do not tolerate violations of the law. This means we will take appropriate disciplinary action in the event of any violations of legal or contractual obligations - regardless of the sanctions provided under the law.**



## How we show responsibility for people and the environment

### We respect human rights, labour and social standards

We believe that all people should be treated with fairness, respect and dignity. Therefore we support and respect internationally recognised human rights as described in the UN Global Compact and the core labour standards of the International Labour Organization (ILO).

Our responsibility to respect human rights, labour and social standards applies along our entire value chain. In doing so, we pay special attention to the rights of particularly vulnerable individuals and groups, such as women, children, people with disabilities, migrant workers or indigenous peoples.

We firmly reject all forms of forced labour, slavery and human trafficking,

child labour and all forms of discrimination. We do support the freedom of association, the right to collective bargaining and the right to a safe and healthy work environment. We take the involvement of and dialogue with local communities and indigenous peoples seriously and also promote dialogue with our customers where appropriate.

Our employees are our most important asset. We respect their contribution to the success of BRITA by providing fair wages that allow for a decent living standard. At the very least, everyone working at BRITA is paid the minimum wage established under the applicable law. We always comply with local regulations on working hours, breaks and off-time from work.



**We treat each other respectfully, fairly and do not discriminate against or harass anyone**

“We live and embrace diversity” is one of our core values. For this reason we treat every person as we would like to be treated ourselves: with respect,

fairness and appreciation for our diverse backgrounds, personalities and views. We do not tolerate any form of discrimination, racism, harassment or bullying.

BRITA is a global company operating in various countries with differing cultures. People with different ethnic and religious

backgrounds, political views, disabilities, gender or sexual identity and of different ages are an asset to us. This is why we stand firm against direct or indirect discrimination, sexual harassment or personal belittling on account of any of these characteristics.

We strive to provide all people with equal opportunities for development and we apply the principle of equal pay for work of equal value. Why? Because everyone’s contribution is relevant and valuable.



### **We comply with the highest standards of occupational health and safety**

People and their knowledge are our capital and protecting our employees has always been an integral part of our corporate culture. Therefore we comply with the legal and technical requirements and standards of occupational health and safety.

We offer a safe, encouraging and supportive work environment that motivates employees to bring their personal best to the table every day. We establish an appropriate safety

management system that includes policies designed to protect the health, safety and welfare of employees, contractors, visitors and others who may be affected by our activities, with the aim of preventing fatalities, work-related injuries and adverse health effects, and limiting exposure to safety hazards. Not only the physical but also the mental well-being of our employees is our highest priority. BRITA offers additional programmes and measures that go beyond legally required safety measures. And we encourage employees to use the resources provided to take care of themselves - no matter if they are dealing with a business or private matter.





### **We protect the environment for future generations**

Sustainability is at the core of who we are and what we do. We design our products and business activities to be as planet- and people-friendly as possible. This means, we minimise our negative environmental impact by reducing energy and resource consumption and

by minimising the amount of waste, wastewater and emissions we create.

As a manufacturing company we contribute to the sustainable use of resources, foster environmental protection and do our part to limit the effects of climate change. Through our actions today and the decisions we make for the future, we ensure the sustainability of our current

business practices and lifestyle. Because we respect and want to protect the living conditions of future generations. We have an appropriate environmental management system at our locations, which includes guidelines and procedures aimed at ensuring compliance with laws, regulations and other binding obligations in order to improve environmental performance and protect the

environment from harmful effects. In particular, we ensure that all hazardous waste is handled, stored, transported and disposed of in accordance with the requirements of the POPs Convention and the Basel Convention.

You can learn more about our sustainability commitment and guidelines in our Sustainability Policy.



## How we conduct our business

### We avoid conflicts of interest

Integrity and trust in our business conduct and professionalism are the basis of our credibility. To protect and safeguard this trust, we always avoid conflicts of interest.

A conflict of interest can arise in various constellations, for example where private interests of employees may conflict with those of BRITA. Personal interests must be strictly separated from the interests of the company to ensure that we can make objective and loyal business decisions for BRITA. If your private or financial interests or relations collide with those of BRITA or may be perceived to collide with the Group's interests, a potential conflict of interest arises. We safeguard the interests of BRITA at all times. We also take care to avoid the appearance of a conflict of interest.

In particular, BRITA employees are not allowed to hold shares in competitor,

supplier or customer businesses or to enter into business relationships with them as private persons, if this might lead to a conflict of interest. Such a conflict of interest occurs whenever the nature and scope of a business holding might in any way influence how employees perform their duties for BRITA. This includes accepting mandates, consultancy contracts or comparable assignments. For the avoidance of doubt: Minor shareholdings of less than 5 percent of the shares of a publicly traded company will not by itself constitute a conflict of interest. Abuse of our position at BRITA for our personal benefit or the benefit of third parties is not tolerated.

We expect every employee to report potential conflicts of interest. We will review any reported conflict of interest and issue instructions for further action to safeguard BRITA and the employee concerned against potential harm.



**We do not tolerate any form of corruption, bribery, fraud or embezzlement**

Corruption distorts competition and harms people and society. We support free competition and therefore comply with applicable laws against extortion, fraud, bribery and corruption.

When conducting business for BRITA, we never give the impression that an incentive may cause us to behave in a certain desired way. The acceptance of money in return for favourable behaviour is categorically prohibited. We also may not demand, promise, grant or accept any tangible or intangible benefits as a consideration for the purchase of our products or services. And keep in mind: When we use third parties to act on behalf of BRITA, we select and monitor them carefully. Third parties (e.g. consultants, brokers, sponsors, representatives or other agents) may never be used to circumvent anti-corruption laws and regulations.

We do not offer, promise, make or accept unauthorised payments of money or anything of value to public officials, government officials, political parties, candidates for public office or other persons. This includes the prohibition of so-called “facilitation” or “grease” payments intended to expedite or secure the performance of a routine governmental act, such as obtaining a visa or customs clearance, unless there is a formal legal fee structure for such expediting services in exchange for a receipt.

Special attention must be paid to gifts and hospitality. In the normal course of business, business invitations or gifts are certainly part of cultivating relationships. However, as a matter of principle, we do not offer hospitality, nor do we give or accept gifts that are excessive. This means gifts disproportionate considering the circumstances, frequency, value, timing of the gift, the position of the giver or receiver, or the total value. Gifts and hospitality in relation to public officials or government organisations are generally prohibited.





## We do not exercise any undue influence on the competition

Fair competition is the engine of our market economy: It creates efficiency, fosters innovation and leads to more choices for customers and consumers. We respect fair and free competition between market players.

Free competition is protected by the prevailing of competition and antitrust laws. These regulations prohibit, among other things, the formation of cartels and the abuse of their position by market-dominant companies. We are committed to free competition and comply with the relevant laws and requirements of every country in which we operate. Why? Because we trust that the quality, value-added and sustainability benefits of our products and services as well as our competitive prices will keep us in the market.

We do not participate in arrangements that violate antitrust law or in the inadmissible exchange of information.

This includes giving or receiving information about prices, volumes, customer information or other business conditions. We also refrain from engaging in any other anti-competitive practices.

Horizontal competition agreements, i.e. agreements or concerted practice between competitors that prevent, restrict or distort competition, are prohibited. In particular, coordination of prices, conditions and supply areas is prohibited.

Vertical competition agreements that seek to restrict suppliers or customers in setting prices or conditions of business towards third parties are not allowed. These include non-competition clauses and price fixing.

We strongly oppose exploiting our market position to the detriment of customers and competitors. We reject legally improper coupling systems, refusal to supply without objective justification as well as any anti-competitive discount schemes.



### **We do not engage in money laundering or terrorist financing**

As a global company we place special emphasis on ethical and integral business conduct when it comes to handling finances. We help to ensure that assets of illegal origin are not introduced into economic circulation.

We carefully check the identity and integrity of customers, business partners and other third parties with whom we wish to do business. It is our declared aim to conduct business solely with reputable partners who operate in line with legal provisions and who use resources from legitimate sources. We also condemn any form of terrorist

financing. Therefore we comply with applicable domestic and international laws to combat money laundering and terrorist financing. Using an automated sanctions list screening process, we ensure that we are always informed regarding current sanctions lists. And we check that our debtors and creditors are not on these lists.



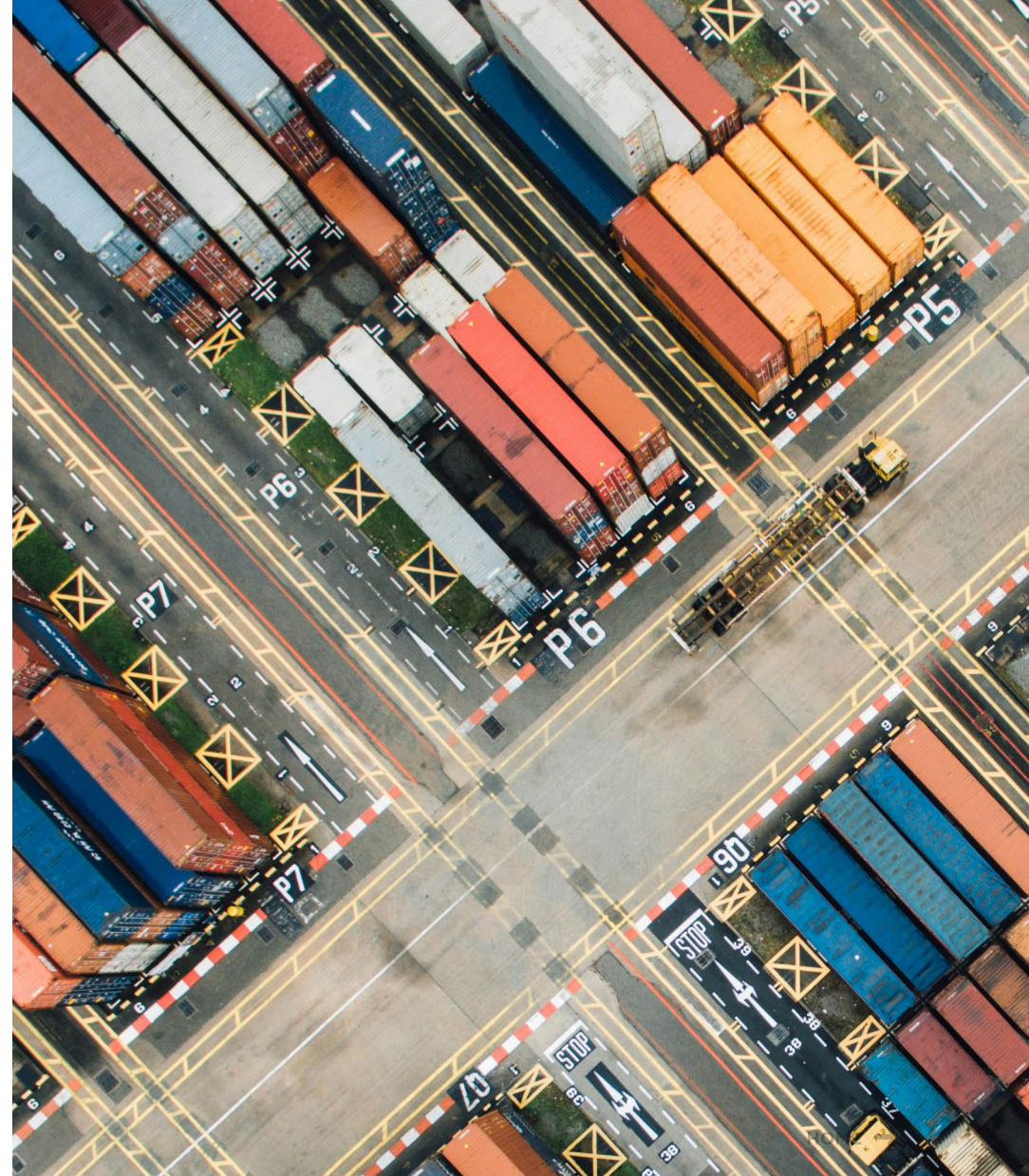
## We comply with export control regulations

Export controls exist for the protection of trade, but can also be a means to protect national and international security. We always comply with the applicable export controls and embargo restrictions.

Export control laws regulate the export and re-export of goods and services that can be used for both military and commercial purposes as well as their transfer within a country. These laws are for the purposes of national security and other aspects or are intended to influence the behaviour of a particular country,

company or individual. The provision of products and services by BRITA may also be subject to such restrictions due to (re-)export controls and embargo regulations of the Federal Republic of Germany, the European Union, the United States of America and/or other countries.

We ensure that our business practices comply with all applicable laws, policies and regulations, including economic sanctions and embargoes governing the export and transfer of parts, components and technical data and services. We provide truthful and accurate information and obtain export licences and/or approvals where required.





### **We keep proper records and meet our obligations under tax and customs law**

BRITA is perceived as a trustworthy company. To maintain this reputation, we are all responsible for presenting our business activities in a transparent, complete and accurate manner using our accounting, financial and nonfinancial reporting.

This means that we prepare all records with accuracy and integrity, so that we can present relevant documentation at any time when required. We completely fulfil our tax obligations and ensure this using our internal control system. And, of course, we comply with all applicable customs regulations.





### We communicate responsibly

Our credibility as a company and as a brand are critical to our success. This means that we communicate in a responsible and consistent way.

What we say is always accurate and transparent and we do not make misleading statements. We also ensure that BRITA logos, certifications we have obtained and labels are used in an adequate and correct manner. Statements or claims about the environmental benefits of our products or about BRITA must be approved, fact-based, documented and, if possible,

supported by scientific methods and standards. We do what is necessary to avoid accusations of greenwashing.

We do not publish confidential or proprietary company information, including when using social media platforms, blogs or other public forums (such as Facebook, LinkedIn, Instagram or WeChat). Even for posts made on a private account, we consider that third parties may understand such posts as an expression of an opinion by BRITA. Only authorised employees are permitted to provide information to the press or on BRITA social media channels on behalf of the company.





### **We protect company and trade secrets and other confidential or internal information**

We possess valuable proprietary expertise as well as a wide range of company and trade secrets that form the basis for our successful business operations. We protect this knowledge and information from third parties.

For BRITA, intellectual property is a significant asset. This includes patents, trade secrets, trademark rights and copyrights. It is our corporate policy to establish, use, maintain, protect and defend all rights to commercially significant intellectual property in a responsible manner.

We comply with all applicable laws governing the enforcement of

intellectual property rights, including protection against disclosure. Furthermore, we respect the intellectual property of other natural and legal persons and use the corresponding information, computer programmes or processes exclusively in accordance with the respective licence agreements or within the framework of the legal requirements.

Similarly, we know that we may become aware of company and trade secrets of third parties. Like our own, we also protect these from unauthorised access, destruction, use, modification and disclosure through appropriate physical and electronic security procedures, including the mitigation of emerging risks to information systems through the implementation of appropriate IT cyber security measures.





### **We treat BRITA property and resources with care**

Wasting company resources or otherwise handling company assets carelessly or improperly harms BRITA – and indirectly all of us. Therefore we take care of the company assets, properties and resources entrusted to us.

As employees, we remember that company property is not for our private benefit. This means we treat BRITA properties (buildings, furnishings, materials, etc.) with care, avoid wastefulness when using resources and carefully consider the usefulness of expenditures on behalf of and for the account of BRITA.



## How we handle our IT systems and personal data

### We secure our IT systems

Ensuring the security of information technology (IT) is very important, as it plays a key role in the performance of all our business activities. We secure our IT systems through awareness and training.

All major strategic and operational functions and tasks are supported to a large extent by information technology. It is therefore important that we handle our IT infrastructure, including hardware and software, responsibly and carefully.

Information security relies on the awareness and know-how of our employees, as they often become targets of data phishing attempts. To enable BRITA employees to do their part, we train them in the secure and careful hand-

ling of IT. As employees we participate in IT training and apply consideration, thoughtfulness and reasoning when using BRITA IT systems.

## We protect personal data

In today's world, personal data is often seen as a valuable currency. To protect it, we comply with the current and applicable data protection laws when processing personal or sensitive data.

Regular dialogue with our employees, customers and suppliers is an integral part of our daily work. Generally, this will include sharing or exchanging personal data such as the name, address or contact details of our contact persons.

When processing personal data of employees or customers, we do so only for legitimate purposes and ensure it is substantively accurate. Personal data is processed and transmitted to other recipients in an adequate and secure way. We do not share personal data without prior consent.





## How we deal with compliance violations and the protection of whistleblowers

### We report and handle compliance violations

To protect the integrity and credibility of BRITA, all our employees can and shall address suspected or actual compliance violations at any time. Direct managers may be a good first contact person for questions regarding compliance and indications of misconduct.

If employees do not want to discuss the issue with their manager, they are free to contact the Group Compliance Department by email ([compliance@brita.net](mailto:compliance@brita.net)), telephone or letter. They can also use the [BRITA Whistleblowing System](#). It provides BRITA employees and external stakeholders with a confidential and anonymous way to report suspected or actual compliance violations. Reports via the Whistleblowing System are received by an external, neutral ombudsperson. If whistleblowers set up a mailbox in the Whistleblowing System, they can communicate anonymously with the ombudsperson.



**We protect whistleblowers and abide by the principle “innocent until proven guilty”**

We protect any person who, to the best of their knowledge and in good faith, submits a report of a compliance violation.

The identity of employees who report a possible violation will be treated confidentially. Anyone making a report about a suspected or actual compliance violation will not suffer any disadvantage because of their reporting. BRITA takes measures to prevent, detect and

correct retaliation. This protection does not apply to persons who intentionally or, in displaying gross negligence, report inaccurate information about a compliance violation or an allegation. In this case, we reserve the right to take legal and disciplinary action against the

whistleblower. We apply the principle of “innocent until proven guilty” and do not prejudice anybody.



1

First and foremost:  
We comply with the law



2

How we show responsibility for people and the environment



3

How we conduct our business



4

How we handle IT systems and personal data



5

How we deal with reports of compliance violations and protection of whistleblowers

Human rights, labour and social standards

Respectful and fair treatment

Standards for health and safety in the workplace

Protecting the environment

Avoiding conflicts of interest

No tolerance of corruption, bribery, extortion or embezzlement

No undue influence on competition

No involvement in money laundering or terrorist financing

Compliance with export control regulations

Proper accounting and fulfilment of tax and customs obligations

Responsible communication

Protecting confidential information

Careful treatment of BRITA property and resources

Securing IT systems

Protecting personal data

Reporting of and dealing with compliance violations

Protecting whistleblowers



## CONTACT INFORMATION

Please do not hesitate to contact your local Compliance Officer or the Group Compliance Department if you have any questions or any problems understanding this Code of Conduct. We will be happy to help.

### **BRITA Group Compliance:**

Phone: +49 6128 746-5323

Mobile : +49 151 12140123

Email: [compliance@brita.net](mailto:compliance@brita.net)

### **Ombudsperson:**

Dr. Kathrin J. Niewiarra, Attorney at Law

Philippstr. 11, 14059 Berlin

Germany

Phone: +49 (0) 30 / 4036750-50

[BRITA@compliance-aid.com](mailto:BRITA@compliance-aid.com)

### **Whistleblowing System:**

<https://brita.hintbox.de>

BRITA SE  
Heinz-Hankammer-Straße 1  
65232 Taunusstein  
Germany

[info@brita.net](mailto:info@brita.net)  
[www.brita.net](http://www.brita.net)

Publishing date: 06/2024