



# Code of Conduct Verhaltenskodex

## Foreword

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„Water is the foundation of our business. We believe that our corporate responsibility for sustainable and ethical action in all our activities arises from that almost inevitably.“

(Markus Hankammer, Sustainability Report 2012)

Water is the element on which we concentrate every day. Moreover, it is the foundation of all life, as well as a scarce and valuable resource. The mere fact that water is handled gives rise to enormous ethical responsibility, which is something we take very seriously at BRITA. Thinking and acting in a sustainable manner play an important role in our work and decisions. Our daily challenge is to pay equal attention to social, ecological and entrepreneurial objectives, as well as to find long-term, sustainable solutions.

Conduct based on integrity and responsibility is an essential and fundamental part of our business culture. Our Code of Conduct is part of our identity. Designed to shape the company nationally and internationally in the future, the following guidelines and principles signify our explicit commitment to corporate governance based on values.

When working to achieve our objectives, it is not just important that we achieve them, but also how we achieve them. Our customers, business partners, the general public and not least you, our staff members, expect us to conduct our business relations with integrity. Ethically and legally impeccable conduct is the responsibility of each individual. We believe that integrity in the sense of sustainable corporate governance takes precedence over short-term business success. If in doubt, we forgo a contract.

Our Code of Conduct applies to every staff member in the world. Its positive effect will develop only if we practise it with conviction in day-to-day business. We must all aspire to secure the economic success of the company and the BRITA brand sustainably by that means.

Communicating and practising the attributes that distinguish BRITA's activities – responsibility and mutual appreciation internally and externally – consciously and with determination is the intention of every one of us.

### **Markus Hankammer**

Chief Executive Officer  
BRITA Group

### **Stefan Jonitz**

Chief Financial Officer  
BRITA Group

### **Rüdiger Kraege**

Chief Sales Officer  
BRITA Group

\* Aus Vereinfachungsgründen gelten alle hier und im Folgenden genannten männlichen Bezeichnungen für männliche und weibliche Personen gleichermaßen.

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## I Objective

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### Responsibility for the reputation of the BRITA Group

The BRITA brand is the foundation of our business and afforded a high degree of trust throughout the world. We are conscious of the responsibility this trust entails. The BRITA Group's reputation is heavily influenced by the attitude, actions and conduct of each one of us. Unlawful or inappropriate conduct by only one staff member can inflict substantial damage on the company. Every staff member is obliged to behave in a manner that ensures the reputation of the company and trust in the BRITA brand are respected, preserved and fostered at all times. The rule is that we want to work in a manner worthy of trust. Trust is the basis of any cooperation – with our customers, within both the company and the BRITA Group, as well as with suppliers.

Our culture when cooperating is influenced by the fact that we give priority to the objectives of the company in its entirety. In this regard, we think and act across sectors and borders.

To safeguard corporate social responsibility, standards and principles that help to prevent acts that are damaging to the interests of the company are defined in BRITA's Code of Conduct. The Code of Conduct is a binding set of instructions that enables us to identify and appropriately respond to issues of an ethical or legal nature that may arise in the course of our work for BRITA globally.

## II Scope

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The Code of Conduct applies to every member of the Executive Board and the Supervisory Board, as well as every executive director, executive and staff member of the entire BRITA Group\* throughout the world and without exception.

It also applies to individuals of equal functional status to internal staff members, such as temporary workers and external project managers.

We also expect the conduct of our business partners to be within the law and based on integrity, as set out in our Code of Conduct.

Majority holdings over which BRITA GmbH exercises no dominant influence are requested to apply the Code of Conduct as appropriate.

## III Implementation

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Familiarisation with the content of the Code of Conduct is the responsibility of every staff member and representative of BRITA.

If local commercial practise or customs oppose a ruling of the Code of Conduct, then the Code of Conduct shall be followed and the Group Legal & Compliance department informed about the derogation.

BRITA shall not tolerate violations of the principles set out in the code. Moreover, they may have consequences under labour law, civil law or both.

In cases of doubt, staff members may turn with complete confidence to their line manager, the relevant executive management or directly to the Group Legal & Compliance department to seek clarification.

\* The code has binding effect for all companies of the BRITA Group over which BRITA GmbH exercises dominant influence. These are usually those companies in which BRITA GmbH holds the majority of shares or voting rights either directly or indirectly.

## IV General principles

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BRITA has made an explicit commitment to adhere to legislation, the statutes and all concluded contracts.

BRITA manages every business relationship according to recognised commercial principles; unfair means are not employed. Equitable relations with business partners conducted in the spirit of partnership are the basis of our entrepreneurial activities.

Every area of our business activities is subject to external and internal rules and regulations. External rules and regulations include statutes, provisions, regulatory guidelines and similar requirements. Both those and internal regulations (internal instructions and other policies, for example) must be complied with.

Every management body, executive and staff member is responsible for ensuring that this is the case within their particular field of activity.

### Responsibility of executives

In particular, it is the duty of every executive to stay and keep their staff members informed of the statutory provisions and BRITA's policies relevant to personal conduct. Executives shall ensure that the instruction, advice and training required for that are provided to the extent necessary. They are the staff member's first point of contact for all matters relating to the Code of Conduct.

Another executive duty is to monitor compliance with provisions in an appropriate manner. In particular, this also applies in the event that specific duties are delegated.

Executives are not permitted to influence staff members to act in a manner that opposes the interests of the company.

### Avoiding conflicts of interest

Every staff member is obliged to safeguard the interests of the company in the course of their duties. Personal interests must be strictly separated from the interests of the BRITA Group. Abuse of the position at BRITA for personal benefit or the benefit of third parties is not permitted.

If a staff member is exposed to a conflict of interest or conflict of loyalty that may give rise to a constraint in objectivity or independence (e.g. external activities, stake in a business partner or competitor, including one held by associated persons or family members) during a business transaction, then the potential conflict of interest shall be reported to the executive responsible for that staff member immediately or if necessary, to Group Legal & Compliance directly. BRITA will review the conflict of interest and issue instructions for further action to safeguard the company and staff member concerned against potential harm.

**Lawful conduct is a prerequisite for preserving the BRITA brand and thus for the success of our business.**

**As executives and staff members, we are responsible for complying with laws and directives. As an executive, we set an example for our staff members. We protect the interests of the company and strictly separate them from personal interests. We treat business partners in an equitable manner and in the spirit of partnership.**

## V Priorities

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### V.1 Dealing with business partners and third parties

Trust and equitability characterise the way we deal with business partners. Personal interests and benefits must not affect our business decisions.

#### V.1.1 Business relations with customers

As a general rule, we treat our customers as we would like to be treated ourselves. At the same time, we observe all statutory requirements.

We win contracts in an equitable manner through the quality and transparent pricing of our products and services. We at the BRITA Group strongly reject offers, promises or the granting of unfair advantages to a decision maker from a private-sector company or members of the public sector for the purpose of winning a contract.

Here, we pay particular attention to gifts, as well as invitations to business meals and events.

If a member of the public sector (office-holder) or decision maker from a private-sector company encourages us to grant unfair advantages, then we shall inform our line manager or Group Legal & Compliance.

#### V.1.2 Business relations with suppliers and service providers

We conduct business relations with our suppliers in an equitable manner and in the spirit of trust. Conversely, we expect this from our suppliers.

Our procurements are always made in accordance with the laws and requirements of the countries in which we operate. The competence of Central Purchasing is dealt with in the policy on procurement. Circumvention of Central Purchasing may be disadvantageous to the BRITA Group. Accordingly, the policy on procurement must be strictly observed.

Our business decisions and the selection of our suppliers are based solely on the interests of the BRITA Group; personal interests are of no relevance.

We do not work with suppliers who attempt to influence our decision by offering or promising unfair advantages. Under no circumstances do we require unfair advantages from suppliers.

The BRITA Group always awards contracts transparently. Material decisions are justified in writing and we adhere to the approval processes.

We aim to avoid the mere impression that our business decisions can be influenced by unfair advantages.

If we are unsure whether we may accept a gift or an invitation to a business meal or an event, then we turn to our line manager or Group Legal & Compliance. We always inform the executive responsible for us or Group Legal & Compliance if we are offered, promised or granted an unfair advantage.

The procurement principles set out in the policy on procurement and the Code of Conduct should be followed even in the case of local procurement transactions.

**We make gifts and invitations to events only if they are appropriate and not likely to affect objectivity in the case in question. As regards accepting gifts and invitations, we act in a corresponding manner. Gifts and invitations directed at private individuals or their family may not be accepted or granted. Gifts of cash or vouchers may not be accepted or granted, either. Special requirements apply when dealing with office-holders. In cases of doubt, we turn to the compliance officer responsible.**

### **V.1.3 Rules and regulations on competition**

The market economy is protected and promoted by antitrust and competition law.

The BRITA Group is committed to equitable competition and follows the relevant laws and requirements of every country in which it operates.

Horizontal competition agreements, i.e. agreements or concerted practise between competitors that prevent, restrict or distort competition, are prohibited. Agreements with competitors may be made neither in writing nor by any other means. In particular, coordination of prices, conditions and supply areas is prohibited. Similarly, exchanging facts relevant to competition that permit conclusions as to the current or future market behaviour of the BRITA Group (advertising, product designs and changes in pricing, for example) is prohibited.

Special care is required when attending or cooperating in business or trade associations. All staff members of BRITA clearly and expressly oppose any inadmissible agreement and form of coordinated practise that oppose competition. As BRITA staff members, if we are aware of or suspect discussions have been held in our presence that are questionable in terms of antitrust law, then we shall inform the Group Legal & Compliance department immediately.

Vertical competition agreements that seek to restrict suppliers or customers in setting prices or conditions of business towards third parties are also prohibited.

These include non-competition clauses and price fixing.

The BRITA Group has a strong market position in some countries. We are strongly opposed to exploiting this position to the detriment of customers and competitors. We strongly reject legally improper coupling systems, refusal to supply without objective justification as well as anti-competitive discount schemes.

**We do not make any agreements with competitors about competitive practise, nor do we share facts with them that influence competition. We report any meeting with a competitor to the Group Legal & Compliance department.**

**We never treat customers unequally without an objectively justified reason.**

**Any contract with a customer or supplier is concluded in accordance with the policy on contract management.**

**We turn to the Group Legal & Compliance department for clarification if we are in doubt as regards competition law.**

## **V.2 Protecting the company and its staff members**

Every staff member is obliged to treat the company's property and assets carefully. We treat company property placed at our disposal with cost in mind, properly and carefully to protect it against damage, loss or theft.

We do not make private use of company property, nor do we use it for activities that do not serve the object of the company. Private use of company property is allowed only if so provided by corresponding written rules and regulations.

We treat intellectual property and internal information of the company related to technologies, projects, marketing and promotional activities, strategic deliberations, business development, etc. equally as carefully. Disclosure of information to third parties is made only to the extent absolutely necessary and within the framework of the corresponding processes. We consult the executive responsible for us in cases of doubt.

In particular, careful treatment of company property includes compliance with internal guidelines for entertainment, business trips and travel expense accounting.

**We believe that careful treatment of the BRITA Group's property and assets is perfectly logical.**

**In particular, we adhere to the internal guidelines for entertainment, business trips and travel expense accounting.**

Respect and mutual appreciation are part of our identity. In the BRITA Group, no individual is discriminated against on the grounds of race, ethnic background, gender, religion or beliefs, disability, age or sexual identity. Every staff member contributes to implementing this principle and behaves accordingly. The BRITA Group respects the privacy of its staff members.

The BRITA Group protects its staff members, customers and the public at large against health hazards associated with performing their duties. Every staff member must adhere to the existing (occupational) safety requirements at all times.

Executives are obliged to inform (and train if necessary) their staff members about the relevant requirements and monitor adherence.

**Our conduct towards each other is characterised by mutual respect and appreciation.**

**We refrain from harassing and respect the beliefs of others. We comply with the requirements for occupational safety.**

**We observe the Code of Ethics.**

## **V.3 Protecting nature and the environment**

As the manufacturer of a food-related product and because we handle water – a vital resource – on a daily basis, the BRITA Group has a special commitment to protecting the environment. Our actions are environmentally compatible in all lines of business. Moreover, we believe environmental protection is a Group-wide duty and are committed to dealing with natural resources in a responsible and sustainable manner. In the course of their activities, all the staff members of the BRITA Group are committed to complying with the laws and requirements for environmental protection. Moreover, through environmentally responsible behaviour they make an active contribution to implementing environmental protection, as laid down in the corporate mission statement.

**We are committed to treating natural resources in a responsible, sustainable manner and comply with the requirements for environmental protection.**

## **V.4 Confidentiality**

### **V.4.1 Dealing with information, privacy protection and the rights of third parties**

In the interest of BRITA's competitiveness, it is essential that internal affairs and sensitive information be treated confidentially.

We always ensure that no information or data intended solely for internal use are conveyed. We always observe existing obligations of confidentiality with third parties.

The obligation to maintain secrecy shall survive the termination of employment.

The protection rights of third parties (copyrights, image rights, patents, etc.) must always be respected and unauthorised exploitation thereof is prohibited.

Rules applicable to privacy protection must always be complied with. Personal data are only collected, processed and used if so doing is necessary for clearly defined purposes. Protection against unauthorised access to personal data and corporate data must be guaranteed. Use of the data must be transparent for those affected. The right of access, rectification, objection, blocking and erasure must be preserved.

**We ensure that the BRITA Group's own data and information or that entrusted to it are not lost or made usable by unauthorised parties. As a general rule, we only use the information and communication systems of the BRITA Group for business purposes and deny unauthorised parties access.**

**We comply with the rules applicable to privacy protection.**

### **V.4.2 Dealing with the media**

Honest reporting in internal and external communications is the basis of effective cooperation made in the spirit of trust.

Only those individuals and bodies designated within the corporate organisation are authorised to disclose on behalf of the company data and information that concern the BRITA Group or individual companies of BRITA to the media. Press inquiries shall be passed on to these bodies immediately, without disclosing information independently.

As staff members of BRITA, we never make any reference to our role within the company when expressing privately held opinions in public, especially those not related to the BRITA Group. If we make statements in a social network personally and not within the scope of our activities for the BRITA Group, then we always make clear that we are expressing our personal opinion and not speaking on behalf of the company.

**Only Group Corporate Communications or individuals it has authorised may disclose to the media information about BRITA.**

### **V.4.3 Dealing with administrative bodies**

BRITA endeavours to maintain an accommodating relationship marked by transparency with all competent administrative bodies. All staff members who are responsible for the communication of information to certain administrative bodies must do so properly, fully and at due date.

In the event of an investigation or search by official bodies (police or public prosecutor, for example), the individuals from Management, the Group Legal & Compliance department and, if applicable, the relevant works management designated for this purpose must be notified immediately. The provision of information or submission of files is made only after consultation with the individuals referred to above.

## **VI Compliance with the Code of Conduct – addressing questions, dealing with violations and information on reporting misconduct**

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This Code of Conduct serves as a guideline for all of us, but it cannot conclusively address every case of doubt or individual case of concern and offer a simple solution. In more complex cases, additional consultation may be necessary. In line with our values, we encourage all of you to seek advice - especially in cases of doubt - and to report information about violations of this Code of Conduct, governing policies or any applicable law. Our executives as well as the local management of BRITA Group are available as contact persons at any time. In addition, it is possible to contact our Group Legal Compliance department at [compliance@brita.net](mailto:compliance@brita.net). This offer is further extended by the possibility to report indications of possible violations of the law or violations of internal guidelines such as this Code of Conduct to the BRITA Whistleblowing System. Whistleblowers can either reach out to the ombudsperson ([BRITA@compliance-aid.com](mailto:BRITA@compliance-aid.com)), or use the internet-based whistleblower system ([www.compliance-aid.com/BRITA](http://www.compliance-aid.com/BRITA)). This option is also available to our business partners and third parties, as an alternative to approaching internal contact points directly. All reports will be treated confidentially and with appropriate care. BRITA guarantees that honest whistleblowers will not suffer any disadvantages as a result of their tip. Pressure, intimidation or similar towards the whistleblower is prohibited and may be subject to disciplinary action. Deliberate abuse of the reporting channels will not be tolerated and lead to sanctions.

Violations of this Code of Conduct as well as internal guidelines and applicable law will not be tolerated and will be subject to appropriate sanctions.

## **VII Social responsibility (Code of Ethics)**

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As a company that operates globally, BRITA has made an explicit commitment to respect its corporate social responsibility. We respect internationally recognised human rights. Moreover, the following objectives and implementation principles apply to our global operational activities. As with the Code of Conduct, they are part of our corporate culture, they are an expression of our identity, and they form the basis for our actions in every business relationship.

### **VII.1 Principles**

#### **1.1 Employment is freely chosen**

The BRITA Group rejects forced and compulsory labour of any kind.

#### **1.2 Zero discrimination**

The BRITA Group provides equal opportunities and equal treatment regardless of ethnic background, skin colour, gender, religion, nationality, sexual orientation, social background and political beliefs, provided the latter is based on democratic principles and tolerance towards those whose convictions are different.

Staff members are neither preferred nor discriminated against on the grounds of membership in a trade union or workforce representation.

#### **1.3 No employment of children**

Children must not be inhibited in their development. Their safety and health must not be impaired. The BRITA Group observes the general minimum age for admission to employment guidelines.

#### **1.4 Freedom of association**

Every staff member has the right to form a collective workforce representation and to engage in collective bargaining to regulate working conditions.

The BRITA Group and the respective workforce representation cooperate constructively and in the spirit of trust. The aim is to obtain sustainable, long-term cooperation in cases of dispute, too.

#### **1.5 Remuneration**

Without distinction of gender, the rules on remuneration in the BRITA Group respect the relevant, legally guaranteed minimum rates of pay, as well as the minimum standards of the particular sector of the economy, and they are based on the respective labour market.

#### **1.6 Working hours**

The BRITA Group adheres to the respective national regulations and agreements on working time and regular paid holidays.

#### **1.7 Labour, health and environmental protection**

The BRITA Group attaches great importance to occupational safety, as well as labour, health and environmental protection. Occupational safety and health protection at work are ensured in the BRITA Group at least within the scope of the provisions of law. Health, safety at work and humane working conditions are important elements of our company policy. A right of the workforce representation to make proposals concerning labour, health and environmental protection is recognised.

## **1.8 Qualification**

As a general rule, staff members are selected, engaged and promoted based on their role-specific qualifications and their skills in the BRITA Group. Focused, continuous and demand-oriented qualification of staff members is supported to permit a high level of performance and work of high quality.

## **VII.2 Implementation**

### **2.1 Inclusion of business partners and suppliers**

Business partners and suppliers of the BRITA Group are supported and encouraged to introduce comparable principles within their companies, to implement them and to account for them in their company policy. The BRITA Group expects its business partners and suppliers to apply these principles as a basis for reciprocal relations and believes they are a suitable criterion for long-term business relations.

### **2.2 Communication, enforcement and complaints**

The above points are available in the relevant national language to staff members of all the companies in the BRITA Group. The objectives are part of the overall objectives of the respective national subsidiary. Every BRITA company reports to the parent company on the degree of implementation at least once a year. In the event of a complaint or information regarding a potential violation of this code, staff members may contact their line manager, their local workforce representation, the HR manager or the Group Legal & Compliance department ([compliance@brita.net](mailto:compliance@brita.net)) directly. Confidential treatment of such information is assured. Staff members who report a potential violation of the law or this policy need not fear any disadvantages whatsoever as a result of doing so.



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