Supplier Code of Conduct

Brigl & Bergmeister GmbH
PAPIRNICA VEVČE d.o.o.
KÄMMERER Spezialpapiere GmbH
KÄMMERER Paper GmbH
KÄMMERER Energie GmbH
ROXCEL Packaging Vevče d.o.o.

This policy is endorsed by the executive management of our holding company, B&B Paper Solutions Holding GmbH, and is publicly available on our group websites at: www.brigl-bergmeister.com and www.kaemmerer-paper.com. Adaptations will be made to both the B&B Supplier Code of Conduct and the systems and procedures which underpin its implementation, in response to new insights, changes in international norms or regulatory requirements, as well as stakeholder feedback.

For any questions regarding our Supplier Code of Conduct please contact sustainability@brigl-bergmeister.com.

Document History

Version	Date	Description	Author
0.1	09.03.2026	Creation	Lengenfelder
0.2	07.09.2026	Scope of entities updated	Gehmayr
1.0	30.10.2026	First publishing	Gehmayr

Approval

Version	Date	Approver	Function
1.0	29.10.2026	Markus Bammer	Managing Director

Introduction

The B&B Paper Solutions Group (B&B) Supplier Code of Conduct outlines the expectations for all suppliers regarding human rights due diligence and environmental protection.

It is in line with the amfori BSCI Code of Conduct and based on internationally recognized principles, including United Nations (UN) Universal Declaration of Human Rights, International Labor Organization (ILO) Conventions and Recommendations, UN Guiding Principles on Business and Human Rights (UNGP), OECD Guidelines for Multinational Enterprises, and UN Children's Rights and Business Principles. Further, it is aligned with and compliments our Group's Responsible Sourcing Policies and the ROXCEL Group Code of Conduct.

Suppliers commit to responsible business conduct and to identifying, preventing, mitigating, and addressing negative impacts within their supply chains.

Principles

The B&B Supplier Code of Conduct and its values are implemented through the set of principles as explained below.

Social Management System and Cascade Effect

The signatory commits to:

- Comply with human rights and conduct due diligence aligned with the UNGP.
- Inform employees and partners of this Code and integrate the principles into operations.
- Train relevant staff to support responsible practices throughout the supply chain.
- Include all workers, especially vulnerable groups, in due diligence processes.

Workers Involvement and Protection

The signatory commits to:

- Ensure transparent communication with workers and their representatives.
- Define long-term goals to protect workers and raise awareness of their rights.
- Provide access to operational grievance mechanisms in line with UNGP Article 31.

The Rights of Freedom of Association and Collective Bargaining

The signatory commits to:

- Respect workers' rights to form or join unions and engage in collective bargaining.
- Ensure non-discrimination against union members and enable representative access.

No Discrimination, Violence or Harassment

The signatory commits to:

- Treat all workers with dignity and prevent any form of harassment or abuse.
- Ensure equal opportunities and maintain clear disciplinary procedures in writing and explain them verbally to workers in terms and language which they understand. The disciplinary measures must be in line with national legislation.

Fair Remuneration

The signatory commits to:

- Comply with legal wage requirements and pay wages regularly and transparently.
- Work progressively toward paying a living wage, if not reached yet.
- Ensure equal pay for equal work.

Decent Working Hours

The signatory commits to:

- Respect the limits defined under national legislation for maximum work week hours and overtime.
- Promote working hour practices that enable a healthy work-life balance for the workers.
- Provide rest breaks and at least one day off every seven days, unless exceptions defined by collective agreements apply.

Occupational Health and Safety

The signatory commits to:

- Provide safe working conditions and comply with national or international standards.
- Ensure that there are systems in place to assess, identify, prevent, and mitigate potential and actual threats to the health and safety of workers.
- Train workers on safety risks and maintain incident records.
- Provide necessary PPE and ensure access to clean water, sanitation, and medical assistance.

No Child Labor

The signatory commits to:

- Not employ, directly or indirectly, children below the minimum age of completion of compulsory schooling as defined by law, which shall not be less than 15 years, unless the exceptions recognized by the ILO apply.
- Maintain strong age-verification and protect children from exploitation.

Special Protection for Young Workers

The signatory commits to:

- Protect young workers from hazardous work and ensure appropriate working hours.

No Precarious Employment

The signatory commits to:

- Ensure employment relationships are documented and lawful.
- Provide workers with clear information on their rights and terms of employment.

No Bonded, Forced Labor or Human Trafficking

The signatory commits to:

- Prohibit all forms of forced labor and apply responsible recruitment principles.
- Ensure workers are not charged recruitment fees and retain control of documents.

Respecting Land Rights

The signatory commits to:

- Honor land tenure rights of impacted local communities and indigenous people, abiding by the principle of free, prior, and informed consent.

Protection of the Environment

The signatory commits to:

- Implement environmental due diligence and comply with legislation or with international standards where national legislation is weak or poorly enforced.
- Prevent and mitigate adverse impacts on the surrounding communities, natural resources, climate, and the overall environment.
- Source deforestation free wood and wood-based materials. Materials that are relevant to deforestation must be of deforestation-free origin and comply with applicable legislation, such as the EUDR, and harvest permits.
- Aim to contribute to climate targets in line with the Paris Agreement and establish reasonable control, monitoring, and reporting processes to reduce greenhouse gas emissions across operations and the value chain.

Ethical Business Behavior

The signatory commits to:

- Prohibit corruption, bribery and falsification of information.
- Implement internal controls, programs or measures for preventing and detecting corruption.
- Adhere to regulations against money laundering.
- Avoid violation of tax laws and ensure no engagement in activities that constitute tax evasion.
- Provide compliance awareness to the workers.
- Ensure data protection and privacy.

Terms of Implementation

The signatory of this Code of Conduct agrees to implement the values and principles set out in this document throughout the life cycle of the business relationship.

Complaints Mechanism

The signatory agrees to report any non-compliance with this Code of Conduct. The B&B confidential reporting channel, in line with Directive (EU) 2019/1937, is accessible at https://roxcelgroup.integrityline.com/. It facilitates the disclosure of breaches related to the provisions of this Code of Conduct and legal requirements. Alternatively, complaints may be sent by email directly to sustainability@brigl-bergmeister.com. All complaints and responses are documented, and stakeholders are informed as needed. These mechanisms enable swift action to maintain supply chain integrity and compliance.

Monitoring in the Supply Chain

The signatory agrees to monitor that this Code of Conduct is observed internally and by their upstream business partners. They acknowledge that B&B may choose to include them in monitoring activities such as on-site or off-site assessments. In the case that non-compliance is verified, B&B will take targeted mitigation action(s) in alignment with the signatory.

ANNEX I: Declaration of the Supplier

We have received a copy of the B&B Supplier Code of Conduct and hereby commit ourselves, in addition to the terms and conditions set out in our purchase orders or contractual agreements with B&B, to complying with its principles and requirements.

Company Name	
Address	
Signatory Name	
Signatory Role	
Date	
Signature	