



Publication of BRIC's Supply Chain Policy on Due Diligence and Transparency relating to Child Labor

(Version 1.0 dated 27th June 2024)

On 27th June 2024 Bernhard Rothfos Intercafé AG ("BRIC") adopted its Supply Chain Policy on Due Diligence and Transparency relating to Child Labor ("Policy"). With the Policy, BRIC commits itself to its responsibilities in relation to sustainability and ethical conduct in its own business area and supply chains and to complying with the due diligence requirements under Art. 964j-k of the Swiss Code of Obligations and the Swiss Ordinance on Due Diligence and Transparency with regard to Minerals and Metals from Conflict-Affected Areas and Child Labor ("DDTrO") of 3 December 2021.

The Policy contains a description of the processes and instruments that BRIC utilizes to identify, assess, eliminate or mitigate risks of potential and actual cases of child labor in its own business area and supply chains. It is aligned with the Responsible Business Program ("RBP") of Neumann Kaffee Gruppe ("NKG") which was set up in consideration of internationally recognized standards such as the UN Universal Declaration on Human Rights, the 2011 United Nations Guiding Principles on Business and Human Rights, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, and the OECD Guidelines for Multinational Enterprises.

Stakeholders' Expectations and Concerns

BRIC is aware that a variety of internal and external stakeholders are concerned about the protection of human rights and environmental-related rights in BRIC's supply chains. In response to these expectations, BRIC will constantly review the Policy and publish statements and other publications to address issues relating to sustainability, human rights, environmental rights and child labor on BRIC's or NKG's website, including an annual local Child Labor Due Diligence Report or an equivalent report at group level.

BRIC's Approach to Due Diligence & Transparency

BRIC and NKG at group level have set up a systematic approach on internal standards and



activities that ensure due regard for human rights and environmental-related due diligence obligations including:

- Risk Assessments: Regular risk assessments and impact assessments of supply chains are conducted to identify potential and actual risks associated with child labor and other human rights violations. These can be based on desk research, expert literature, direct supplier risk assessments through questionnaires and on-site visits. In individual cases, also external experts, authorities, international organizations and civil society organizations are involved.
- Preventive, Remedial, and Corrective Measures: Based on the outcomes of these risk assessments, appropriate measures are initiated and implemented to prevent, correct and/ or remediate any actual or potential risks found.
- Policy instruments & Initiatives: BRIC has written down its values, principles and beliefs as the basis of its business in the [NKG Code of Conduct](#) and the [NKG Supplier Code of Conduct](#). The [NKG Supplier Code of Conduct](#) is aligned with the core due diligence approach in this Policy and applies to key suppliers. NKG also sustains initiatives such as NKG Verified to increase sustainability along the supply chains.
- Due Diligence Instruments & Initiatives: NKG has introduced local due diligence procedures and the Supply Chain Integrity Platform (“SCIP”), which enables BRIC and other group companies to meet supply chain due diligence requirements through adopting a risk-based management approach, supplier due diligence checks, Corrective Action Plans, **NKG Supplier Code of Conduct**; human rights in-depth risk assessments every two years, improvement measures; and the NKG grievance mechanism.
- Training & Capacity Building: Training and support for employees to strengthen their capacity to comply with relevant due diligence requirements is provided.
- Complementary Activities: NKG has implemented and maintains the complementary measures to ensure due regard for human rights and the prevention of child labor in its supply chains, among them collective action initiatives such as engagement through the ILO Child Labour Platform (CLP). Moreover, BRIC sources coffees that are certified according to the recognized



standards of Rainforest Alliance, 4C, AAA Nespresso, Fairtrade, and Bio Suisse, among others, as well as under our own initiative NKG Verified.

- Communication & Reporting: BRIC communicates its compliance efforts in line with Swiss due diligence legislation and provide regular reports on our progress and challenges. This includes regular publications, such as the Child Labor Due Diligence Report (as of 2024).
- Reporting Concerns: BRIC has implemented a robust grievance mechanism through which employees, business partners, workers and third parties can raise concerns regarding actual or potential violations of the principles outlined in our Codes of Conducts and applicable laws within BRIC´s own operations and supply chains. This includes but is not limited to the NKG whistleblowing platform available at <https://integrity.nkg.net>.
- Continuous Improvement: BRIC´s supply chain practices and the Policy are continuously reviewed and / or adapted based on new findings and developments regarding child labor.

Further information

- [Responsibility - Neumann Kaffee Gruppe \(NKG\)](#)
- [NKG Code of Conduct](#)
- [NKG Sustainability Report 2022](#)
- [NKG Supplier Code of Conduct](#)
- [NKG Integrity](#)