



**BERG
FREUNDE**

Supplier Code of Conduct

Status April 2025





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FOREWORD BY THE MANAGEMENT

Dear Partner,

We are convinced that together we can achieve more. Working in partnership, we want to maintain a supply chain that is not only economically successful, but also socially responsible and ecologically sustainable. We are aware that the outdoor industry contributes in many ways to the many ecological and social challenges of our time. At the same time, we know that by working together with our partners, we can bring about positive change. So, let's make a difference together and take responsibility – for a transparent supply chain that is based on high social and ecological standards.

The following Supplier Code of Conduct forms the basis of our cooperation and is an integral part of our agreement with suppliers. It defines the expectations and social, ecological and ethical standards that we place on our suppliers - and is not just a set of rules, but also an expression of our values and convictions.

We are convinced that we can only be successful in the long term through close and trusting cooperation. By complying with the requirements of the following Supplier Code of Conduct, we are making a joint contribution to a responsible, fair and more sustainable outdoor industry.

Thank you for your commitment and support in implementing these important issues.



1. PREAMBLE

As an online retailer in the outdoor industry, Bergfreunde GmbH (hereinafter referred to as "Bergfreunde") is aware of its responsibility within the global supply chain and is committed to ecologically and socially responsible corporate governance. This commitment applies both to Bergfreunde's own business activities and to its supply chains. Bergfreunde therefore involves its suppliers – as part of the supply chain – by demanding that they also comply with the principles and requirements of the following Code of Conduct.

The following Code of Conduct explains the specific requirements and expectations that Bergfreunde has of its suppliers and forms the basis for future cooperation. The contractual partners undertake to endeavor to fulfill the principles and requirements of the following code of conduct.

Specifically, the Code of Conduct covers key topics such as fair pay, regulated working hours, the prohibition of child and forced labor, the promotion and protection of the health and safety of all employees as well as climate, environmental and animal protection. The content is based on national laws and international conventions such as the [Ten Principles of the United Nations Global Compact](#), the [United Nations Universal Declaration of Human Rights](#) and the [International Labor Organization \(ILO\) Declaration on Fundamental Principles and Rights at Work](#).



2. SOCIAL RESPONSIBILITY

When it comes to human and labor rights, Bergfreunde takes a clear position: Regardless of their role in the value chain, all people have the right to respectful treatment and humane working conditions. Bergfreunde respects human dignity and respects internationally recognized human rights, as set out in particular in the [United Nations Universal Declaration of Human Rights](#) and addressed in [the United Nations Guiding Principles on Business and Human Rights](#) and in the [OECD Guidelines for Multinational Enterprises](#). Bergfreunde also complies with the internationally recognized [labour standards of the International Labour Organization \(ILO\)](#). In all its business activities, Bergfreunde always endeavors to neither cause nor contribute to human rights violations. Bergfreunde expects the same from its suppliers. They are obliged to comply with all laws, regulations and human rights in the employment of their employees and to fulfill the corporate due diligence obligations along the supply chain. In particular, the following aspects must be taken into account:

2.1 EMPLOYMENT RELATIONSHIPS

Bergfreunde complies with the applicable labor law in all employment relationships and always complies with social security obligations. Bergfreunde expects the same from its suppliers. This includes the following aspects in particular:

- Employees shall be provided with comprehensible information on the essential terms and conditions of employment, including their rights and obligations as well as working hours, remuneration and payment and settlement modalities, at the beginning of the employment relationship. Bergfreunde expects its suppliers to conclude written employment contracts with all employees that contain an accurate, complete and comprehensible summary of the terms and conditions of employment, including wages, benefits and working hours. The right of employees to terminate their employment relationship in accordance with the applicable notice period must be respected.
- Bergfreunde rejects any form of unlawful punishment, abuse, harassment, intimidation or other unworthy treatment of employees. Bergfreunde expects its suppliers to respect the personal dignity, privacy and rights of every individual and to prohibit all forms of violence and assault in the workplace.
- No employee may be subjected to physical, sexual, psychological or verbal harassment or abuse. Fines or penalties as disciplinary measures are not permitted. All employees must be treated with respect and dignity.

2.2 PROHIBITION OF CHILD LABOR AND PROTECTION OF YOUNG WORKERS

When it comes to child labor, Bergfreunde takes a zero-tolerance stance. In this context, "child" – as defined in [ILO Standard No. 138 Article 2.3](#) – is defined as a person under the age of 15. Bergfreunde undertakes to work only with suppliers who do not tolerate any form of child labor and who comply with the provisions of [ILO Standard No. 182 on the prohibition and immediate action for the elimination of the worst forms of child labor](#). Suppliers must ensure that both their own production processes and those along their own supply chain are free from child labor. They must strictly comply with the applicable legal minimum age for admission to employment. In any case, they may not employ any persons under the age at which compulsory education ends under the law of the place of employment or under the age of 15. If child labor is detected, all necessary measures must be taken immediately to focus on the welfare, protection and development of the child.



In addition, the rights of young employees (employees in the 15-18 age group) must be particularly protected. Bergfreunde expects its suppliers to employ young workers only if it is ensured that the working and employment conditions neither pose a risk to their health or safety nor are harmful to their development. The maximum limits for working hours and overtime for employees in this age group must be set with special consideration of age.

Bergfreunde expects its suppliers to have appropriate means of determining age and to check and document proof of age before hiring.

2.3 PROHIBITION OF FORCED LABOR

Bergfreunde does not tolerate any form of forced or compulsory labor in its supply chain. This includes any form of bonded labor, prison labor, servitude, slavery or slavery-like practices, human trafficking and other involuntary labor and services that are forced through coercion, intimidation, threats, coercion or other inhumane treatment. Bergfreunde undertakes to work only with suppliers who respect the rights of workers and strictly reject forced labor – as defined in [ILO Standard No. 29 to the Convention on Forced and Compulsory Labor](#) and [ILO Standard No. 105 on the Abolition of Forced Labor](#). Suppliers must therefore ensure that their production processes are free from forced labor and that all relevant laws and international standards are complied with. All work must be performed on a voluntary basis and workers must have the freedom to terminate their employment with reasonable notice and without detriment. The retention, confiscation or destruction of original identification documents, passports, work certificates or other personal documents of employees is prohibited. Bergfreunde expects its suppliers to carry out regular checks and inspections to ensure that their production is free from forced labor and that all workers are treated freely and fairly.

2.4 FAIR REMUNERATION

Compliance with and promotion of fair wages are essential in order to create decent working conditions. Therefore, the fair remuneration of all employees in the supply chain is of utmost importance to Bergfreunde. Bergfreunde's suppliers are obliged to comply with the statutory or – where applicable – collectively agreed provisions when remunerating labor. In any case, the principles of [ILO Standard No. 26 on the establishment of procedures for the determination of minimum wages](#) and [ILO Standard No. 131 on the determination of minimum wages, particularly with regard to developing countries](#), must be observed. Under no circumstances may the wages paid be below the legally applicable minimum wage or the prevailing industry standard. Wages must also be paid punctually and regularly.

Ambition:

The statutory minimum wage is a minimum requirement, but not a recommended level. Bergfreunde expects its suppliers to work towards ensuring that workers in the supply chain receive a living wage. This means that the wages paid for regular full-time work should be sufficient to enable workers and their families to lead a decent life.



2.5 WORKING HOURS

Compliance with regulated and fair working hours is a central expectation of Bergfreunde's suppliers. They must ensure that the statutory or applicable collectively agreed provisions on working hours, including overtime, rest breaks and vacation, are complied with. The maximum number of regular working hours specified in the applicable laws of the country in which the supplier operates must not be exceeded. As stipulated in [ILO No. 1 Standard Articles 2 to 5 of ILO Standard No. 1](#), this limit may not exceed 48 hours per week, unless there are exceptional circumstances in accordance with Overtime must always be voluntary, must not be regularly requested and must never exceed 12 hours per week. In addition, it must be ensured that the employees' entitlement to at least one day of rest in every seven-day period is guaranteed and that the agreed annual and sick leave is granted without any form of disadvantage. Bergfreunde expects its suppliers to implement transparent working time regulations for all employees involved in the production process and to monitor these regularly to ensure that the well-being of employees is always safeguarded.

2.6 FREEDOM OF ASSOCIATION

Bergfreunde respects the right of employees to freedom of association, freedom of assembly and the right to collective bargaining and attaches great importance to ensuring that this is upheld within the supply chain. Bergfreunde's suppliers are therefore obliged to respect and comply with the right to freedom of association and the right to collective bargaining - insofar as this is legally permissible in the respective country of employment and in accordance with [ILO Standard No. 135 on the Protection and Facilitation of Workers' Representatives in the Workplace](#). All workers should be free to associate freely, form trade unions and bargain collectively without fear of reprisal or discrimination.

Ambition:

In countries where the right to freedom of association and collective bargaining is restricted, other possibilities of free association or social dialogues for employees should be made possible or permitted.



2.7 EQUAL OPPORTUNITIES AND PROHIBITION OF DISCRIMINATION

Bergfreunde is committed to equal opportunities and rejects any form of discrimination or unjustified unequal treatment in employment, for example on the basis of national and ethnic origin, social background, health status, disability, sexual orientation, age, gender, political opinion, religion or belief. Similarly, Bergfreunde expects its suppliers to ensure that discrimination and unequal treatment have no place in their operations and that the principles of [ILO Standard No. 100 on equal pay for male and female workers for work of equal value](#) and [ILO Standard No. 111 on discrimination](#) are observed. Bergfreunde expects its suppliers to make additional efforts to promote an inclusive and diverse work environment in which all employees are treated fairly and respectfully regardless of gender, age, ethnic origin, religion, sexual orientation, disability or other personal characteristics. Every employee should be given equal opportunities for hiring, promotion, training and career development.

2.8 HEALTH AND SAFETY AT WORK

The health and safety of workers throughout the supply chain is of central importance to Bergfreunde. Therefore, Bergfreunde requires its suppliers to comply with all relevant laws on safety in the workplace as well as national and international occupational health and safety standards, in particular [ILO Standard No. 155 on Occupational Safety and Health and the Working Environment](#). Bergfreunde expects its suppliers to continuously take measures to minimize risks and prevent accidents and work-related illnesses. A safe and healthy working environment must be created. This includes a regular risk assessment of workplaces and the implementation of suitable hazard prevention and precautionary measures. It must be ensured that employees are trained in all relevant occupational health and safety topics.



3. ECOLOGICAL RESPONSIBILITY

As an online retailer in the outdoor industry, Bergfreunde is convinced that outdoors is the best time. At the same time, Bergfreunde is aware that an intact environment is under serious threat, particularly due to the climate and biodiversity crisis. Bergfreunde is also aware that the outdoor industry contributes in many ways to the ecological challenges of our time. As an online retailer in the outdoor industry, Bergfreunde therefore has a special responsibility and endeavors to keep the impact that Bergfreunde's business activities have on the environment as low as possible. Accordingly, Bergfreunde its business activities taking into account ecological aspects - including animal welfare - and is committed to the 1.5 degree target with regard to combating the climate crisis. The latter is underpinned by the climate targets validated by the Science Based Targets Initiative.

Similarly, Bergfreunde expects its suppliers to make every effort to minimize the negative impact of their business activities on the environment - both in their own business operations and along the supply chain. It is particularly important to Bergfreunde that its suppliers take the following aspects of environmental and climate protection as well as animal and species protection into account.

3.1 ENVIRONMENTAL AND CLIMATE PROTECTION

Bergfreunde's suppliers must comply with the applicable legal requirements and recognized standards for the protection of the environment and climate in all countries in which they do business and must also make efforts to avoid or minimize the negative impact of their business activities on the environment and climate. This includes the following aspects in particular:

- **Careful use and protection of natural resources:** Bergfreunde expects its suppliers to be actively committed to the conservation of natural resources and to work continuously to minimize the ecological footprint of their business activities and along their supply chain. This includes in particular efforts to
 - Increasing energy efficiency and the share of renewable energies in energy consumption
 - Avoiding and reducing waste
 - Minimization of water consumption and/or pollution
 - Promotion of circular technologies.

Bergfreunde expects the products offered to them to be manufactured in the most resource-friendly way possible.

In addition, Bergfreunde expects that the products offered to them are not associated with deforestation, forest degradation or the violation of the rights of indigenous peoples in accordance with the applicable legal regulations and that the necessary proof is provided by the suppliers in accordance with EU Regulation 2023/1115 "EUDR" Deforestation-free supply chains.

Ambition:

Bergfreunde also expects the proportion of recycled and/or sustainable raw materials in its products to increase continuously.



- **Ambitious climate protection:** Bergfreunde expects its suppliers to conduct their business activities in such a way that they avoid greenhouse gas emissions as far as possible and work continuously to reduce greenhouse gas emissions through their business activities and along the upstream and downstream supply chain.

Ambition:

Bergfreunde has set itself the following target as part of the Science Based Targets Initiative: Bergfreunde commits that at least 75% of suppliers, measured by revenue for purchased goods and services, will have science-based climate targets by the end of 2026. Bergfreunde therefore encourages its suppliers to set ambitious, science-based climate targets and strongly recommends that these are validated by the Science Based Targets Initiative or a comparable organization.

Bergfreunde also expects that - where available - emissions data will be disclosed at regular intervals, both at company and product level. It is the declared aim of Bergfreunde to focus in the medium term on partners who fulfill this ambition in the area of climate protection.¹

- **Responsible handling of chemicals and hazardous substances:** Bergfreunde expects its suppliers to handle chemicals and hazardous substances in a professional and responsible manner. Substances that are hazardous to the environment and health should be avoided in the production process to minimize the environmental impact and ensure safety in the workplace during production. Chemicals or other substances that pose a risk to the environment if released must be handled in such a way as to safety during handling, transportation and storage. Disposal must be carried out in a safe manner. Bergfreunde also expects all products offered to meet the requirements of the REACH Regulation [Regulation (EC) No. 1907/2006 (REACH)] in its current version.

Ambition:

Bergfreunde expressly advocates the use of independent certifications such as the Bluesign seal or comparable certifications to ensure that the entire manufacturing process is as environmentally friendly as possible and that an end product is produced that is harmless to health. In addition, the products offered to Bergfreunde should be BPA-free and PFAS/PFC-free in the future.

3.2 ANIMAL AND SPECIES PROTECTION

Bergfreunde recognizes the importance of animal welfare and species protection in the production of outdoor clothing and equipment and is committed to an animal-friendly textile industry. Bergfreunde therefore requires its suppliers to consider responsible practices with regard to animal husbandry and the use of animal products and to enforce them along their supply chain. The keeping and use of animals must comply with the applicable legal animal welfare requirements, in particular the [German Animal Welfare](#), and be species-appropriate. In addition, the [Washington Convention on International Trade in Endangered Species of Wild Fauna Flora](#) must be observed.

¹ For more information and details see: www.bergfreunde.de/lieferanteninfo.



Bergfreunde strongly recommends its suppliers to make efforts in terms of animal welfare and animal protection that demonstrably go far beyond the minimum legal requirements and to use appropriate certifications. Bergfreunde consistently expects its suppliers to ensure that all products offered meet correspondingly high animal welfare standards and do not contain any materials that originate from endangered animal species. Explicitly prohibited are:

- **Real fur:** Bergfreunde is part of the Fur Free Retailers program and strictly rejects the use of real fur. Therefore, Bergfreunde requires its suppliers to ensure that the products offered do not contain real fur.
- **Mulesing practices:** The products offered must be mulesing-free. Bergfreunde requires its suppliers to ensure that only animal-friendly methods are used to prevent fly infestation.

Ambition:

Bergfreunde expressly advocates the use of certifications such as the Responsible Wool Standard (RWS) or comparable certifications to ensure that the wool has been procured in compliance with high animal welfare standards.

- **Live plucking of down/feathers and down/feathers from force-fed birds:** Bergfreunde requires its suppliers not to use any down/feathers in the products offered that have been obtained from live plucking or force-fed birds. Bergfreunde's suppliers must ensure that all down used comes from ethically responsible sources.

Ambition:

Bergfreunde expressly endorses the use of certifications such as the Responsible Down Standard (RDS) or comparable certifications to ensure that the down used has been procured in compliance with high animal welfare standards.

- **Leather that is not a by-product of meat production:** The leather in the products on offer must not come from animals that are bred and kept specifically for their skin. Suppliers of Bergfreunde must ensure that the leather used in their products meets high animal welfare standards.

Ambition:

Bergfreunde explicitly advocates the use of appropriate certifications such as the Leather Working Group or comparable certifications to ensure that the leather used has been procured in compliance with high animal welfare standards.



4. ETHICAL BUSINESS PRACTICES AND INTEGRITY

Bergfreunde always bases its business activities on generally accepted ethical values and principles, including integrity and respect for human dignity. Bergfreunde behaves fairly and respectfully towards its employees, suppliers and customers. Bergfreunde expects the same from its suppliers. It is important to Bergfreunde that suppliers take the following aspects into account in their business activities.

4.1. AVOIDANCE OF CORRUPTION

Bergfreunde rejects bribery and corruption in any form and avoids even the appearance of it – be it in the form of granting or accepting unfair advantages.

Similarly, Bergfreunde's suppliers must not tolerate corruption. Bergfreunde therefore expects them to comply with the relevant anti-corruption laws and the conventions of the United Nations and the Organization for Economic Cooperation and Development to combat corruption. Bergfreunde also expects its suppliers to comply with the relevant legal obligations to prevent money laundering and not to participate in money laundering activities.

4.2 FAIR COMPETITION

Bergfreunde is committed to free and fair global trade and complies with the laws and regulations of the countries and regions in which it does business. Bergfreunde does not tolerate any anti-competitive agreements and ensures that Bergfreunde acts in accordance with the applicable antitrust laws. Bergfreunde rejects competitive advantages through unfair business practices. Bergfreunde expects the same from its suppliers. Specifically, Bergfreunde requires its suppliers to

- not take unfair advantage of local or regional conditions, e.g. poverty, to gain an unfair competitive advantage
- refrain from misleading and aggressive business practices to protect companies and consumers
- refrain from price fixing and the allocation of markets, supply areas, products or customers
- refrain from the unlawful exchange of competitively sensitive information or the coordination of offers with competitors.

In addition, Bergfreunde expects its suppliers to recognize the importance of whistleblowers who report concerns or violations of legal or internal company regulations and to set up an internal complaints procedure in accordance with [EU Directive 2019/1937](#) ("Whistleblower") or the corresponding national implementing acts of this directive on whistleblower protection and to ensure a safe and protective environment for whistleblowing.



4.3 PERSONAL DATA AND PROTECTION OF CONFIDENTIAL INFORMATION

Bergfreunde respects the personal rights of its employees, suppliers and customers and complies with the applicable legal and regulatory requirements for the processing of personal data and information security when handling personal information. Similarly, Bergfreunde's suppliers must take care to protect the business secrets and other confidential information entrusted to them in a permissible manner from unauthorized acquisition, use and disclosure. Information that is not known to the general public may not be passed on by the suppliers for personal gain or for the gain of another person. Suppliers are obliged to process personal data lawfully and to ensure its confidentiality, availability and integrity through technical and organizational measures. All rules and provisions of the [EU General Data Protection Regulation \[GDPR\]](#).

4.4 CONSUMER INTERESTS

Bergfreunde's suppliers must take suitable measures to ensure the safety and quality of the products offered. It must be ensured that the offered products comply with the relevant legal consumer protection regulations. In particular, the legal requirements about safety, labeling and product packaging as well as with regard to the use of hazardous substances and materials must be complied with. Suppliers are obliged to provide Bergfreunde with the safety data sheets and all safety-relevant information prior to the first delivery without being requested to do so, insofar as this is required by the applicable laws, regulations and standards. Thereafter, the partner must provide a safety data sheet whenever the material composition or substance formulation of such products changes.

Bergfreunde also requires its suppliers to take consumer interests into account in their information and sales activities by applying fair business, marketing and advertising practices and promoting consumer education. Particular attention should be paid to the interests of children, senior citizens, people with disabilities and other vulnerable consumer groups.

5. CONTROL AND ENFORCEMENT

Bergfreunde attaches great importance to working in partnership with its suppliers and always endeavors to support its suppliers in meeting and exceeding the required standards of the Code of Conduct. Bergfreunde expects all its suppliers to respect the requirements of the Code of Conduct and to do their utmost to achieve and enforce them. If the supplier discovers violations of this Code of Conduct in the course of its cooperation with its suppliers, it undertakes to investigate, clarify and, if necessary, take appropriate remedial action. In any case, Bergfreunde must be informed immediately (duty to report). Bergfreunde also encourages its suppliers to demand compliance with the provisions of the Bergfreunde Supplier Code of Conduct from their contractual partners in the supply chain.

Bergfreunde or its service providers have the right at any time, but always during normal business hours, announced or unannounced, to carry out checks on the Supplier and/or, if applicable, its subcontractors to verify the rules of conduct set out in this Code of Conduct. In the event of serious violations, Bergfreunde reserves the right to terminate the business relationship immediately.



Bergfreunde takes any violation of the Supplier Code of Conduct seriously. All employees and other persons can report any violations to Bergfreunde in confidence using the following contact details: [Whistleblower office for whistleblowers and complaints procedures in accordance with the Supply Chain Due Diligence Act \(LkSG\)](#). Upon notification of violations, Bergfreunde shall initiate measures for proper and confidential clarification and, if necessary, initiate suitable and appropriate countermeasures together with the Supplier in the sense of remedy and prevention. If no agreement can be reached, or if the agreed measures are not complied with by the supplier, Bergfreunde reserves the right to terminate the business relationship. In this context, Bergfreunde reserves the right to carry out unannounced spot checks.

ACKNOWLEDGEMENT AND SUPPLIER CONSENT

By signing this document, the supplier undertakes to act responsibly and to comply with the principles/ requirements set out in the Code of Conduct. By signing this document, the supplier declares that – in addition to the obligations under the supply contracts with Bergfreunde GmbH - it essentially shares the objectives and contents of the Supplier Code of Conduct and will make suitable and reasonable efforts within the scope of its respective possibilities to continuously comply with the requirements at all its locations and in the supply chain. The supplier undertakes to communicate the content of this Code of Conduct to its employees, agents and subcontractors in a way that is understandable to them and to influence its implementation.

Place, Date

Signature

Name and Function of Signatory



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