



# Supplier Code of Conduct

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**6<sup>th</sup> July 2018**





## Introduction

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At JACOBS DOUWE EGBERTS, we believe that maintaining the utmost trust and integrity in our relationships with our suppliers is critical to our success—so much so, that we require them to acknowledge and adhere to values and principles that align with our own. We expect our suppliers to know and follow the laws, regulations, rules, and industry standards in all of the locations where they operate. We also expect our suppliers to adopt the JACOBS DOUWE EGBERTS Supplier Code of Conduct (“Supplier Code”). Simply put, this Supplier Code is a set of guidelines that will help our business partners make the right, ethical choices.

We believe sustainable business practices in our supply chain contribute to improvement of our products. They also allow us to enjoy long-term, mutually beneficial relationships with our suppliers. Therefore, we encourage our suppliers and contractors to adopt sustainability standards and practices consistent with our own. This Supplier Code is part of our corporate sustainability policy, and seeks to minimize any adverse environmental and social impact directly associated with the goods and services we purchase.

Our Supplier Code is also part of the contractual obligations between JACOBS DOUWE EGBERTS and our suppliers. It is subject to periodic verification. JACOBS DOUWE EGBERTS will help our suppliers comply with the principles embodied in the Supplier Code where possible, but will take appropriate measures against suppliers who refuse to adhere to these principles.

Please note that this Supplier Code does not address every situation our suppliers may face when working on our behalf—it couldn’t possibly. It does, however, illustrate the important concepts our supplier companies must keep in mind when conducting business with JACOBS DOUWE EGBERTS.



## Asking for Help and Voicing Concerns

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Suppliers of JACOBS DOUWE EGBERTS have a duty to report any actual or suspected misconduct that involves or impacts the Company. This is true whether it is a violation of this Supplier Code or applicable laws, and whether it is committed by our suppliers or our own associates. Reporting these types of concerns helps our Company proactively address issues and maintains the integrity of our business relationships.

In addition to your company's own internal reporting resources, you have resources available to you through JACOBS DOUWE EGBERTS, including:

- The Alertline
- Our Supply Chain, Procurement, and/or Compliance Departments
- The Ethics and Compliance Email at [ethics.compliance@JDEcoffee.com](mailto:ethics.compliance@JDEcoffee.com)

The Alertline is maintained by an independent third party provider—it is not staffed with JACOBS DOUWE EGBERTS associates. It is available online to all of our suppliers worldwide, and is accessible by telephone in most of the locations in which we operate. Operators are available in the various languages our suppliers and their associates speak.

Just as we expect of our associates, all of our suppliers must cooperate fully with an investigation or inquiry by Company personnel, outside auditors, or government officials. Keep in mind that JACOBS DOUWE EGBERTS does not tolerate discrimination of or retaliation against anyone who makes a report—or participates in an investigation of one—in good faith.

# Acting Honestly and Ethically While Working and JACOBS DOUWE EGBERTS

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## Health, Safety, and Respect

JACOBS DOUWE EGBERTS believes in fostering a diverse, inclusive work environment where all ideas, perspectives, and backgrounds are considered. Likewise, we feel strongly that our health and safety are paramount to the work we do. To this end, our Company provides a safe, fun place to work where ideas and productivity can thrive. Therefore, we expect our suppliers to adhere to all applicable laws and regulations, such as the International Labor Organization (ILO) standards, and not discriminate on the basis of legally protected traits, such as:

- Race
- Color
- Sex
- Sexual orientation
- Marital status
- Religion
- Political affiliation
- Nationality
- Ethnic background
- Social origin
- Age
- Disability
- Works council membership
- Freedom of association
- Collective bargaining rights
- Any other trait protected by law

Our Company also does not tolerate any form of unlawful harassment, bullying, threats or acts of violence, or disrespectful behavior by or toward our suppliers. Suppliers must know and follow proper safety protocols when working on our behalf, and must never work while impaired by alcohol, drugs, or medications.

If you witness any acts of discrimination or harassment, or any unsafe behaviors or conditions, you have a duty as a JACOBS DOUWE EGBERTS supplier to speak up right away through the appropriate resources.

## Product and Service Quality

We are innovators in the coffee and tea market, and take great pride in the superior quality of our offerings. Upholding our commitment to quality and safety ensures those who consume our products enjoy the best possible experience, while those who work with us in manufacturing, marketing, and distributing them may do so with confidence.

We expect our suppliers to take the same pride in the products (including primary packaging) and services with which they supply us. To this end, suppliers of



JACOBS DOUWE EGBERTS are expected to comply with applicable legislative and regulatory requirements when providing goods or services to our Company. For goods, compliance applies not just to the country of origin (such as where the product was produced), but also to the countries of destination. It covers all the characteristics of the goods, including packaging. If concerns about product safety or quality control exist, our suppliers have a responsibility to follow internal controls and alert our Company right away.

## **Fair, Ethical Relationships with Others**

We expect our suppliers to provide us with accurate and truthful information about their products and services, just as we do for our customers.

We also expect our suppliers to abide by international competition laws. Suppliers of JACOBS DOUWE EGBERTS should not discuss topics that could violate—or appear to violate—competition laws, including:

- Price fixing
- Bid rigging
- Division of territories or customers
- Tying and bundling products
- Abuse of dominant market position

## **Conflict of Interest Avoidance**

Our suppliers are expected to make decisions in the best interest of JACOBS DOUWE EGBERTS. Any situation that creates—or even appears to create—a conflict between your personal interests or those of your employer and those of our Company must be avoided.

In particular, suppliers may not offer cash or lavish or inappropriate gifts or entertainment to a Company associate or to a third party on behalf of JACOBS DOUWE EGBERTS. Suppliers are expected to disclose actual or potential conflicts of interest to our Company. Having a conflict of interest is not necessarily a violation of our Supplier Code, but failing to disclose the conflict is a violation.

## **No Corrupt Practices**

We believe in doing business fairly and free of any corrupt influence. Engaging in bribery or other forms of corruption yields no long-term benefit for our Company. In fact, bribery and other forms of corruption undermine the integrity of JACOBS DOUWE EGBERTS.

To be clear, a “bribe” can be anything of value, such as money, gifts, entertainment, or special favors. Laws in many countries prohibit us from paying bribes to third parties, including government officials.

While working for JACOBS DOUWE EGBERTS, do not:

- Make, offer, or promise a bribe to a third party, including a public official or government personnel



- Offer or accept a personal “kickback,” or the return of a sum paid or due to be paid as a reward for making business arrangements
- Retain a third party to pay a bribe or kickback on our behalf, or knowingly allow one to do so
- Make “facilitation payments,” or payments made to speed up routine government actions (such as issuing a permit)

## **Trade Compliance**

Customers around the world enjoy our products, and we strive to make them globally available. In order to ship our products—and obtain the goods and services to help produce them—we are expected to comply with international trade laws. This extends to our compliance with the various export and import controls that apply to our work. We expect our suppliers to do the same.

As a supplier of JACOBS DOUWE EGBERTS, you should follow the various export and import controls that govern your work. If you engage in trade activity, ensure you know and follow the rules and regulations that apply to your job.

In addition, suppliers must abide by international trade sanctions. If you do not know whether a particular country, entity, or individual is subject to trade sanctions, contact our Company’s Legal Department or your company’s internal resources for assistance.

## **Protecting Assets and Information**

At times, suppliers of JACOBS DOUWE EGBERTS may be given access to our Company’s assets and information. All suppliers must take reasonable precautions to prevent these resources from being stolen, damaged, or misused. Our suppliers are also expected to comply with any non-disclosure agreements regarding our Company’s confidential information. JACOBS DOUWE EGBERTS’s resources must be used at all times in a way that is safe, ethical, and lawful.

## **No Insider Dealing**

Buying or selling securities—such as stock or options— on the basis of information about our Company that is not publicly available is a violation of insider dealing laws, and is strictly prohibited. Likewise, providing such inside information to any other person who buys or sells securities—a practice known as “tipping”—is prohibited. Engaging in insider dealing may subject JACOBS DOUWE EGBERTS, our suppliers, and individuals involved to criminal or civil liability, making it critical that suppliers avoid it.

Knowing what is considered inside information can sometimes be a challenge. In general, information is material if it would be considered important by a reasonable investor in determining whether to buy, hold, or sell the stock of the company to which such information relates. Information is normally considered nonpublic or undisclosed until two full trading days have passed since its public release. Inside



information can be either positive or negative in nature, and includes the following examples:

- Significant new products or discoveries
- New business relationships
- News of a significant sale of assets
- Important changes in management

## **Good Corporate Citizenship**

JACOBS DOUWE EGBERTS is a good corporate citizen that believes in promoting human rights throughout our organization. In doing so, we adhere to all wage and hour laws in the locations we operate. We also do not use or condone unlawful child or forced labor, and do not conduct business with those who do.

Just as importantly, we expect our suppliers to uphold individual rights, including wage and hour laws, in the work they perform for us. Our supply chains must allow their people to maintain a good quality of life, and actively work to help them achieve that standard of living. Furthermore, we expect our suppliers to promote and comply with international standards for human rights, including those set forth by the ISO. This means, in part, that under no circumstances should our suppliers use any forced, bonded, indentured or prison labor. All suppliers of JACOBS DOUWE EGBERTS are expected to comply with international regulations preventing worker exploitation and human trafficking.

## **We Are Environmental Stewards**

JACOBS DOUWE EGBERTS is a conscientious leader—one that is mindful of our effect on our surrounding environment and willing to take steps to lessen our impact. To this end, we implement sustainable practices worldwide, striving to meet or exceed environmental laws and regulations. We seek to conserve resources, minimize waste and valorize it where possible, and make efficient use of water, energy, and raw materials.

We hold our suppliers to similar standards of environmental excellence as well. In particular, we expect our suppliers to:

- Reduce the use of energy, water, and raw materials;
- Reduce waste and emissions to air, soil, and water;
- Reduce the use of chemicals and fertilizers, and exclude the use of chemicals and fertilizers which are hazardous to the health of consumers;
- Contribute to recycling and reuse of materials and products;
- Use environmentally friendly technologies; and
- Incorporate environmental impact into product development and packaging design.

## **Audits and Termination of Supplier Agreements**

JACOBS DOUWE EGBERTS reserves the right to verify our suppliers' compliance with this Supplier Code through audits or other monitoring activities.





In the event that JACOBS DOUWE EGBERTS becomes aware of any actions or conditions that violate our Supplier Code, we will request that corrective action

be taken. Furthermore, JACOBS DOUWE EGBERTS maintains the right to terminate an agreement with any supplier who does not comply with this Code.

## Resources

There are a number of options available to you when raising a concern or seeking additional information.

The Alertline is available 24/7 to all associates worldwide to help answer your questions on business conduct issues and compliance-related matters. It also allows you to advise JACOBS DOUWE EGBERTS of situations that may require investigation or management attention.

The Alertline is committed to keeping your issues and identity confidential. If you would be more comfortable doing so, you may contact the Alertline anonymously. Your information will be shared only with those who have a need to know, such as those involved in answering your questions or investigating and correcting issues you raise.

## Alert line Numbers

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Country	Access Code	Freephone/LCR
Australia		61283113030
Austria		0800 281700
Belarus		882000 730028
Belgium		003224010546
Brazil	52262	552135008987
Bulgaria		00800 110 44 74
China	52262	4001 204952
Czech Republic		+420228885126
Denmark		4536927633
France	52262	33170770423
Georgia		+995706777955
Germany	52262	0800 180 4007

<b>Greece</b>		<b>+302111984823</b>
<b>Hungary</b>		<b>06800 14863</b>
<b>Ireland</b>		<b>0035316950742</b>
<b>Italy</b>		<b>00390687503657</b>
<b>Kazakhstan</b>		<b>87172696063</b>
<b>Latvia</b>		<b>+37166164320</b>
<b>Lithuania</b>		<b>+37052140795</b>
<b>Malaysia</b>	<b>52262</b>	<b>60392122180</b>
<b>Mexico</b>	<b>52262</b>	<b>525541611449</b>
<b>Morocco</b>		<b>212520485043</b>
<b>Netherlands</b>		<b>0031207036452</b>
<b>New Zealand</b>		<b>+6498874609</b>
<b>Norway</b>	<b>52262</b>	<b>2193 9710</b>
<b>Poland</b>		<b>+48128812711</b>
<b>Portugal</b>		<b>800 880 374</b>
<b>Romania</b>		<b>08008 94440</b>
<b>Russia</b>	<b>52262</b>	<b>+74993504513</b>
<b>Singapore</b>	<b>52262</b>	<b>6531631423</b>
<b>Slovakia</b>		<b>421233056807</b>
<b>South Africa</b>		<b>0800 990520</b>
<b>Spain</b>		<b>4938004964</b>
<b>Sweden</b>		<b>46850336415</b>
<b>Switzerland</b>		<b>0225801730</b>
<b>Thailand</b>		<b>027873679</b>
<b>Turkey</b>		<b>902129001615</b>
<b>UK</b>		<b>0800 374199</b>
<b>Ukraine</b>	<b>52262</b>	<b>+44 1249 661808</b>
<b>United States</b>		<b>1877 533 5310</b>
<b>Zambia</b>		<b>+44 1249 661808</b>

**If your country is not listed above, please call:**

**+44 1249 661808** or at one of the following freephone numbers:

<http://www.expolink.co.uk/whistleblowing-hotline/PDF/International-Freephone-listing.pdf>

**You may contact us any time at:**

Reporting tool: <https://wrs.expolink.co.uk/JDE>

Email: [Ethics.compliance@JDEcoffee.com](mailto:Ethics.compliance@JDEcoffee.com)

Company website: [www.jacobsdouweegberts.com](http://www.jacobsdouweegberts.com)