

## **Code of Conduct for Business Relationships**

Coffee by Storm seeks to enable a global level playing field for responsible business conduct. That is why we work with the globally agreed minimum standard for responsible business conduct. We share equal and globally authoritative requirements for responsibility with all our relationships and meet the same requirements ourselves. We wish to enable our relationships to manage their responsibility in alignment with global expectations of them.

### **I. Introduction**

This Code of Conduct for Business Relationships (CoCBR) serves the purpose of ensuring that Coffee by Storm Business Relationships, including suppliers and partners, demonstrate responsible business conduct by identifying and managing risks of actual and potential adverse impacts in relation to internationally agreed principles on human rights (including labour rights), the environment (including climate), and anti-corruption.

The areas of sustainability covered by this CoCBR are reflected by the UN Global Compact. The requirement for responsible business conduct is aligned with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD).

Meeting the minimum standard for responsible business conduct as defined by the UNGPs/OECD is distinct from legal compliance; Business Relationships are always expected to comply with national laws, where they operate. Coffee by Storm reserves the right to levy additional, more specific requirements related to sustainable development, should specific circumstances require such focus.

### **II. Management Requirements**

Coffee by Storm expects its Business Relationships to develop and implement a management system that is fully aligned with the globally agreed minimum standard for responsible business conduct (UNGPs/OECD).

#### **II.I. Scope**

The required management system shall, at a minimum, address adverse impacts on the human rights stated in the International Bill of Human Rights, including the core labour rights from the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work; significant adverse impacts on the external environment in relation to the areas addressed by the Rio Declaration on Environment and Development, including the climate as reflected in the Paris Agreement; and adverse impacts on anti-corruption, as related to the scope outlined by the United Nations Convention against Corruption. Coffee by Storm can share a simple overview of the scope upon request.

This includes the following actions:

#### **II.II. Adopt a Policy Statement**

The Policy Statement of our Business Relationships shall

- be approved at the most senior level of the company
- be informed by expertise in the UNGPs and OECD

- stipulate the company's expectations of employees and its business relationships
- be publicly available and communicated both internally and externally
- be embedded in all other operational policies and procedures throughout the company.

#### II.III. Establish and Maintain a Due Diligence Process

Business Relationships shall establish processes that allow for regular assessments of risks of actual and potential adverse impacts on the Scope, confer II.I above. Business relationships shall identify risk of impacts, act to prevent or mitigate actual or potential adverse impacts identified, and measure and track effectiveness of such actions. Business Relationships are expected to communicate findings, actions taken, and ongoing status to impacted stakeholders and to business relationships, including Coffee by Storm, upon request.

#### II.IV. Provide for access to remedy

Where Business Relationships identify that they cause or contribute to actual adverse impacts in relation to the Scope, Business Relationship must provide for access to remedy through legitimate processes (grievance mechanisms) for those affected. Notification of relevant authorities may be necessary in relation to significant impacts in the areas of environment and anti-corruption. If Business Relationships are linked to actual severe adverse impacts, but do not cause or contribute to them, Business Relationships must use or build leverage to make the causing or contributing entity address the impacts and prevent or mitigate reoccurrence.

### III. Implementation

Coffee by Storm also implements the requirements outlined in this CoC and is prepared to share information or documentation with its Business Relationships.

This CoCBR applies to Coffee by Storm's first-tier Business Relationships. Our first-tier Business Relationships shall require from their first-tier business relationships to have similar and adequate processes in place to manage adverse impacts on the Scope, as outlined by the minimum standard (UNGPs/OECD). If severe adverse impacts are identified in Business Relationships' value chains, Business Relationship must use or build leverage to make the causing or contributing entity(ies) adequately address such impacts and undertake reasonable efforts to ensure that such entity(ies) operate in accordance with the minimum standard.

Business Relationships must maintain appropriate records to demonstrate compliance with the requirements of this CoCBR. Appropriate records include Policy statement(s), documentation of due diligence processes, including operational-level impact assessments and transparent records on tracking effectiveness of actions, documented grievance mechanisms, and requirements to business relationships. Enhanced due diligence is expected from larger businesses, businesses working with dangerous products or services, and/or in a pre-, in-, or post-conflict areas.

This CoCBR form a foundation for the collaboration with our Business Relationships to pursue continuous improvements in managing adverse impacts on the Scope. Should Business Relationships not have implemented a management system in alignment with this CoCBR at the time of signing, an implementation plan should be developed and, if requested, presented to Coffee by Storm. Coffee by Storm expects Business Relationships at any time to be able to declare their stage of implementation

in relation to the requirements contained in this CoCBR.

If Coffee by Storm's Business Relationships cause, contribute to, or are linked to *severe impacts* on the Scope, Business Relationships shall notify Coffee by Storm immediately. The notification shall include an account of Business Relationships' actions to end the severe impacts and to prevent or mitigate their re-occurrence; or to use or build leverage. If Business Relationships neglect to notify Coffee by Storm of and address severe impacts, or if they demonstrate lack of willingness to meet the international minimum standard, Coffee by Storm reserves the right to end the business relationship immediately.

January 28th, 2025



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Fritz Storm  
Founding partner

January 28th, 2025



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Carsten Ohm Frederiksen  
Founding partner