



OETKER COLLECTION

# Declaration of principle on the human rights strategy

of Oetker Collection KG

Bielefeld, November 2023



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## I. Social responsibility

### **We are committed to respecting human rights**

As Oetker Collection KG, we as well as all our affiliated companies worldwide (hereinafter referred to as the "Oetker Collection Group"), are committed to following clearly defined human rights principles. These serve as a framework for our entrepreneurial and business activities with the aim of fulfilling our responsibility towards people and the environment.

The prerequisite for sustainable business practices is an effective interaction of social commitment and economic success.

Thanks to our high standards of compliance, diligence and integrity, it is a key concern of ours to equally appropriately avoid and address human rights and environmental risks in our business divisions and supply chains. The respective local laws in force constitute a minimum standard for us to comply with.

## II. Requirements for us and our partners

### **We define specific requirements for ourselves and our partners**

To do justice to the respect and recognition we have for human rights in the Oetker Collection Group, we have implemented policies that define the corresponding requirements for our employees, our customers and our suppliers:

#### **- Code of Conduct in the Company**

We have created the "Code of Business Conduct" guideline as an everyday orientation for our employees. It serves as a compass and helps us to sustainably evaluate situations and actions in our day-to-day work. With this guideline, we address human rights and environmental issues, anti-corruption requirements as well as other related topics.

#### **- Code of Conduct for business partners**

Just as we do within the Oetker Collection Group, we also focus on realising our defined values and principles together with our business partners. We therefore actively call on our business partners to also act in accordance with our values and principles and support our goals. The legal framework for this is defined by the Oetker Collection Group's Code of Conduct for Business Partners, which sets out the applicable principles, values and legal requirements. Successful collaboration requires compliance with the Codes of Conduct and this must be assured and demonstrated by all relevant business partners.

### III. Identification and assessment of risks

#### **We identify risks and address them appropriately**

We assess potential risks with regard to human rights and environmental pollution in our business divisions at least once a year together with our immediate suppliers. Risks are identified, prioritised and avoided on the basis of these risk analyses. To this end, we conduct expert interviews and evaluate the correspondingly defined requirements, such as the regions of origin and product groups of our suppliers, in a structured manner.

Based on our analyses, we have essentially identified the following priority risks in our supply chain:

- **Risks to working conditions**
- **Discrimination risks**
- **Health and safety risks**
- **Environmental risks**

Wherever we identify risks, whether it's in our own business division or with immediate suppliers, they are prevented, eliminated or at least minimised by taking appropriate measures.

To avoid or eliminate these risks in our own business division, directives have been implemented to ensure appropriate preventive and remedial measures are taken. These include providing training as well as developing and consistently implementing control measures. Compliance with the requirements is regularly checked by the relevant departments.

Depending on the level of risk, further information is initially obtained from our immediate suppliers. Following further review, the Oetker Collection Group reserves the right to take individual measures, such as organising training courses, providing informational material on human rights and environmental due diligence obligations or establishing contractual agreements to address and control the risk in the future.

If risks cannot be avoided in individual cases, together with our suppliers we define how the identified risks are to be addressed as part of a remediation concept and within a specific time frame. We also reserve the right to take further measures.

We are aware that violations of human rights can also occur in spite of our diligent conduct. For this reason, we have established a complaints procedure and whistle-blower system for our own business division as well as for suppliers and upstream suppliers, through which affected parties or other whistle-blowers can report abuses at any time.

Our whistle-blower portal supports whistle-blowers reporting abuses for ethical and moral reasons. Whistle-blowers make a significant contribution to safeguarding our social values and the rule of law and therefore to the sustainable success of our Company.

#### IV. Outlook

**We are continuously improving our commitment to human rights and the environment and report on this.**

We regularly evaluate our risk management system in respect of its effectiveness. This includes critically scrutinising our existing processes. Even under changing framework conditions, we strive to constantly improve our procurement processes in the spirit of this declaration of principles in all Group companies.

We report annually on identified risks and the measures taken to avert them. We evaluate the effectiveness of our measures and draw conclusions for future activities.

The management of the Oetker Collection Group is responsible for the implementation of and compliance with this declaration of principles. The management is supported in this by our human rights officer, who regularly informs the board on identified risks and the effectiveness of risk management system.

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