

**Gebr. Heinemann**  
Gegründet 1879



# **Policy statement on human rights**

June 2025 | Version 2

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## I. Our commitment to the protection of human rights

As a family-owned company, Gebr. Heinemann puts people at the centre: our employees, our customers, our business partners and all other people who come into contact with us directly or indirectly. This appreciation of people is anchored in the vision of our corporate mission statement:

The Heinemann Family. We turn travel time into valuable time as the most human-centric company in global Travel Retail.

Accordingly, we hold the recognition and protection of human rights in high regard. Worldwide, we value responsible processes and responsible interaction in our operations, our value chain, our partnerships and in the locations where we operate.

As a signatory of the United Nations Global Compact, we have anchored the principles on human rights, labour standards, the environment and anti-corruption in our corporate strategy, our corporate principles and our guidelines.



→We align our business activities with the following internationally recognised human rights frameworks and standards:

- the United Nations Universal Declaration of Human Rights
- the UN Guiding Principles on Business and Human Rights
- the OECD Guidelines for Multinational Enterprises
- the Ten Principles of the United Nations Global Compact (UNGC)
- the conventions and recommendations of the International Labour Organisations (ILO) on labour and social standards

## II. Our implementation of human rights due diligence

### 1. Our expectations of ourselves and our partners

As an international group of companies, it goes without saying that we conduct our business within the scope of the applicable legislation in each country. We also assume responsibility for complying with recognised international environmental, legal and social standards.

Our requirements for safe and fair working conditions, respect for human rights, environmental protection, anti-corruption, fair competition and data protection, among others, are anchored in our [Code of Ethics](#)  and our [Supplier Code of Conduct \(SCoC\)](#) . Our Code of Ethics complements our corporate mission statement with sustainable and responsible action and, like a compass, clearly and precisely points the way for ethical behaviour – both within our company and our subsidiaries as well as in our business relationships in international Travel Retail.

We train our employees and managers at regular intervals on the Code of Ethics and, in particular, on respect for and protection of human rights and compliance with relevant laws and regulations.

Our suppliers and business partners have assured us that they take responsibility for compliance with all relevant national and international laws and regulations. We also expect them to take all necessary measures to ensure that both they and other business partners within their value chain comply with the requirements of our Supplier Code of Conduct.

## 2. Risk analysis and measures


We are aware that implementing human rights due diligence is a continuous process. As it is our ambition to continuously develop, we thoroughly review our own business activities. To this end, we undergo an assessment by the international sustainability rating platform EcoVadis, which enables us to identify risks and potential for improvement and to initiate measures.

As an international retailer in the travel market, we have already established a firm framework in our own business processes to exclude human rights risks. We see potential human rights risks primarily in the upstream value chain.

Therefore, we conduct a risk-oriented integrity check before concluding contracts with our suppliers. Even after a contract has been signed, we check our suppliers' compliance with our Supplier Code of Conduct through our central purchasing departments as part of our "Responsible Choice Sourcing Programme". The programme includes a comprehensive risk analysis and risk assessment of our immediate suppliers. In addition to the EcoVadis platform, we use the SAQs and SMETA audits provided by SEDEX.

## 3. Complaints mechanism and corrective measures

In order to systematically prevent or counteract violations, we have established various chan-

nels for victims and observers of human rights violations to report irregular behaviour or raise concerns in writing or verbally. Access and the rules of procedure of our anonymous whistleblowing portal can be found [here](#) . We treat reports of possible human rights violations confidentially and discreetly; our compliance team investigates them immediately.

If we actually identify negative impacts caused by or contributed to by Gebr. Heinemann, we immediately take measures and precautions to prevent, end or minimise the extent of the human rights violation.

## III. Responsibilities for human rights due diligence at Gebr. Heinemann

Our management at Gebr. Heinemann is responsible for ensuring that we take into account and implement this policy statement at all times in our day-to-day business activities. In this way, we ensure that each area of our company is aware of its own obligation to respect human rights. Our Director of Legal, Compliance und Sustainability also regularly informs the management about the status of the implementation of our human rights due diligence.

The operational management and monitoring of our human rights due diligence is in the hands of the Legal, Compliance und Sustainability department. It coordinates the measures, sets priorities and manages the company-wide processes for compliance with human rights. The central purchasing departments play a particularly important role in implementation in the upstream value chain. They work closely with the Legal, Compliance und Sustainability departments in cross-functional teams to ensure the protection of human rights.

### → Communication and disclosure

This policy statement is published across the Group for all our employees and is accessible

at all times. In addition, we regularly inform and sensitise both our employees and our partners regarding its contents.

#### IV. Outlook

We are working to embed human rights due diligence ever more deeply into our operational processes in order to further minimise human rights risks and prevent negative impacts. We will regularly review and adapt our policy statement to reflect changes and current processes. We also report annually on our approach and progress, as well as our human rights commitments in our Annual Business and Corporate Responsibility Report.



Max Heinemann,  
Owner & Co-CEO



Raoul Spanger,  
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## **Impressum:**

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