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### 1. Commitment and Purpose

The values and measures described in this DE&I Policy form the basis for Gebr. Heinemann's responsible actions.

Gebr. Heinemann is committed to the mission of being the most human-centric company in global travel retail. Gebr. Heinemann has always stood for a culture that recognizes diversity as an enhancement, equity as a necessity, and inclusion as a strength.

Our global DE&I policy is a clear commitment to this mission to create a working environment in which every employee can grow and in which individual perspectives enrich our connection to customers and the world of travel. The aim is to ensure that all employees work according to the same principles and thus create a uniform experience, both internally and externally, in customer and supplier contact as well as the application process.

Together with our global DE&I corporate strategy, this policy defines the principles and areas of action that Gebr. Heinemann DE&I promotes throughout the organization. It refers to – but is not limited to – our practices in relation to new talents, people development and recognition, leadership, work-life balance, collaboration, work environment, communication, and overarching topics.

# 2. Scope of Application

This policy applies to all employees of Gebr. Heinemann SE & Co. KG and its direct and indirect subsidiaries as well as to the personally liable shareholders of Gebr. Heinemann SE & Co. KG.

For reasons of simplification, the term "Gebr. Heinemann" is used in these guide-

lines. Employees also include all board members, managing directors, and executives of Gebr. Heinemann.

This guideline applies in all countries in which Gebr. Heinemann operates. It supplements the Code of Ethics. If local laws, other regulations, or local standards apply at a location that set stricter requirements than these guidelines, the stricter requirements must be complied with. However, if this guideline is stricter than the standard at the respective location, the stricter requirements of this guideline shall apply, unless this conflicts with local law. In this sense, this policy does not contradict any local law.

## 3. Strategic Approach

#### 3.1 Guiding Principles

At Gebr. Heinemann, we strive to create a working environment that recognizes and promotes the uniqueness of every employee. We see people as individuals who cannot be reduced to single attributes. Our commitment to responsibility and safety is reflected in a space that enables inclusive collaboration and equal opportunities for all.

Our corporate values "We are family," "We live trust," "We create change," and "We excite people" form the basis for a trusting and successful working relationship. They reflect our ambition to promote an inclusive culture in which every voice is heard and every contribution counts. We see our DE&I principles as complementary to our corporate values.

**Diversity:** We see diversity as a broad spectrum of individual differences and similarities between personalities that cannot be reduced to a single characteristic. This diversity is not only recognized in our corporate culture, but actively harnessed as

a source of strength, innovation, and creativity.

**Equity:** We ensure equal opportunities for all, regardless of the dimensions of diversity, age, ethnic background and nationality, gender and gender identity, physical and mental abilities, religion and worldview, sexual orientation and social background. This also means that a person's unique circumstances are taken into account and treatment is adjusted accordingly so that the outcome is the same for everyone.

Inclusion: We take responsibility for each other and create a safe space for holistic collaboration. Our vision of inclusion is an active process that enables everyone to contribute and participate meaningfully and with their authentic self at work. We create a culture of openness and mutual respect that aims to accept and welcome everyone, empowering them to have a voice and sense of belonging.

The principles of DE&I characterize our Gebr. Heinemann culture, which values diversity, promotes equity, and fosters inclusion. They are critical to our ability to develop innovative solutions and provide excellent service. It enables every employee to grow and succeed while being respected and valued as an individual.

#### 3.2 Core Areas of Action

Our DE&I strategy under the motto "We have your back" is a living expression of our endeavor to create a supportive and appreciative environment for each individual in our diverse workforce, in which every employee feels included.

Based on our DE&I principles, we have defined specific fields of action for Gebr. Heinemann.

These fields of action serve as guidelines for our decisions, promote awareness, and ensure goal orientation. They are continuously monitored in order to measure the associated (target) progress and ensure the effectiveness of our initiatives. They reflect our priorities and are firmly integrated into our core (HR) processes.

#### **New Talents**

Unconscious discrimination is a particularly important issue in talent attraction and talent management. Gebr. Heinemann will therefore ensure that the people responsible for talent attraction receive regular training on the topic of unconscious bias and discrimination. It is also important for new employees to experience the relevance of DE&I right from the start of the employee journey — namely, during the application process — in order to ensure that DE&I issues are dealt with sensitively.

→In particular, the aim of this action field is to make DE&I a coherent cornerstone of our onboarding process by the end of 2025 at the latest.

#### **Development and Recognition**

As every single person shapes our corporate culture and helps to ensure that everyone feels welcome, valued, and heard, DE&I starts with each and every individual. Gebr. Heinemann will therefore create a fundamental awareness of the DE&I under-standing among all employees. It will also ensure that everyone has the same opportunities for development and recognition based on objective criteria.

→In particular, the aim of this field of action is to ensure that all employees are trained in DE&I regularly by the end of 2025 at the latest.

#### Leadership

The global diversity of Gebr. Heinemann's employees is a key strength of the company. This strength should also be reflected at management level to enable a broader range of perspectives and ideas that lead to more innovative and creative solutions. Our leaders are one of the key drivers of diversity and inclusion and should be empowered as advocates of DE&I. To ensure gender equality at management level, Gebr. Heinemann has set itself the goal of balancing leaders with different genders or gender identity internationally.

→In particular, the aim of this field of action is to ensure that the main dimensions of diversity, depending on the location, are reflected at all leadership levels by the end of 2028 at the latest.

#### **Work-Life Balance**

As a family business, Gebr. Heinemann attaches great importance to the compatibility of work and family life. The aim is to offer care facilities for relatives in every country. In the future, Gebr. Heinemann will promote the compatibility of work and family life for all employees even more extensively. In addition, opportunities for self-care and personal well-being will be created. This is often a prerequisite for the ability to care for others.

→In particular, the aim of this field of action is to introduce a Group-wide family offer, targeting child, elder, and relative care, by the end of 2025 at the latest.

#### Collaboration

In order to learn and benefit from the diversity of our employees, global overarching projects will consist of diverse team members to increase synergy and share best practice solutions. Gebr. Heinemann will ensure that cognitive and identifiable diversity are formed for such projects. → In particular, the aim in this field of action is to have defined criteria for members of global overarching projects by the end of 2025 at the latest.

#### Workspace

Gebr. Heinemann aims to promote an inclusive working environment that values and recognizes the diverse backgrounds of our employees. Accessible premises and digital work tools are essential to promote equal access for all and to create a more inclusive environment for the workforce and customers, including people with disabilities.

→In particular, the aim in this field of action is to introduce a procedure to regularly review our accessibility measures to identify opportunities for improvement by the end of 2024 at the latest.

#### Communication

Open communication and transparency are the basis of the family culture at Gebr. Heinemann. We therefore ensure that the communication platform is accessible and user friendly for all employees, regardless of their location.

→In particular, the aim in this area of action is to introduce a Group-wide communication platform that is accessible to all employees by the end of 2024 at the latest.

To support our DE&I goals, we develop and implement numerous initiatives at Group and local level every year. We regularly monitor the progress and success of these initiatives through internal DE&I surveys. We also continuously gather external input as members of recognized DE&I initiatives, such as the Diversity Charter in Germany.

#### 4. Control Standards

#### 4.1 Governance Structure

The global Corporate Sustainability Steering Committee manages and monitors our global DE&I initiatives, integrates them into business processes, and makes decisions at a Group level. It consists of the management of the Gebr. Heinemann Group and ensures the deep anchoring of DE&I.

The global DE&I Steering Committee is one level below the Corporate Sustainability Steering Committee and consists of members from People & Culture, Corporate Sustainability, and international representatives from our retail locations. It drives strategic development, monitors progress, and ensures the successful implementation of measures.

Regional DE&I managers lead customized local initiatives and are responsible for documenting the progress of measures. In doing so, they steer DE&I measures that they have harmonized with local contacts to ensure they are a perfect fit.

An ambassador network, which is managed by the Corporate Sustainability department, also serves to share knowledge on sustainability issues across all locations. In addition, all employees are invited to proactively help shape the DE&I culture, participate in various awareness-raising formats, and thus drive the progress of DE&I forward.

# 4.2 Reporting of Inappropriate Behavior

Employees who think they have witnessed or been affected by behavior that violates this policy are explicitly requested to report such incidents immediately. This is an essential part of our ethical standards. Depending on the incident, employees can make use of various offers of help that are perceived as suitable depending on the situation and location. They can consult their manager, contact the works council or local trust council, or follow the local complaints procedure. There is also the global whistle-blower system, under which every employee has the right to submit complaints. This also serves as a means of managing and resolving conflicts in the workplace, about which our whistleblower system flyer provides detailed information and procedural instructions.

If the incidents or perceptions do not require any of the previous reporting channels, an informal email with feedback can be sent to corporatesustainability@gebr-heinemann.de.

#### 5. Outlook

At Gebr. Heinemann, we are on a continuous journey to further develop our DE&I culture and embed it globally. We can only achieve this goal together through continuous education, dialogue, reflection, and action. Each and every one of us plays a decisive role in thinking DE&I in everything we do.

