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**ace & tate**

# Human Rights Policy 1.0

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## 1. Our commitment

Ace and Tate Holding B.V. ("Ace & Tate", "we", "our") is dedicated to upholding human rights across all aspects of our business. This commitment is founded on international standards: the International Bill of Rights and the ILO's Declaration on the Fundamental Principles and Rights at Work. We apply the UN Guiding Principles on Business and Human Rights (UNGPR) as the foundation for our approach, recognising that this policy is subject to ongoing evolution.

Where national law and international human rights standards differ, we will follow the higher standard; when faced with conflicting requirements, we will adhere to national law, while seeking ways to honour the principles of internationally recognised human rights.

## 2. Governance

This Human Rights Policy has been officially adopted by the board of Ace and Tate Holding B.V.

The Responsibility and Legal department jointly manage this policy's overall implementation, including regular reporting on progress and impact to the board, leadership, and management team.

Day-to-day responsibility for implementation and reporting is delegated to the Responsibility Manager. The Responsibility Manager reports to the CFO, who provides regular updates to the Board and Leadership team of Ace and Tate Holding B.V.

### 3. Our mission and vision

We're committed to becoming a more responsible business, every day. For people, for the planet and for the long run. We've been and continue to be honest about where we stand and how far we have to go. We don't label ourselves as a sustainable company, but promise to push boundaries in crafting responsibly made, well-designed quality eyewear.

We firmly believe in equal treatment, respect, and dignity for all individuals. For Ace & Tate, respecting human rights aligns with our core values, fostering an environment where individuals can be their authentic selves.

Conducting business in an ethical and sustainable manner is one of our core values. Our [Supplier Code of Conduct](#) established a clear commitment: we strive to take responsibility for the impact our products and operations have on the planet and the people we work with. Using creativity, innovation and collaboration, we aim to support our mission to reduce our impact and inspire positive change in our industry. Our Supplier Code of Conduct expresses these values alongside describing what we consider to be appropriate business conduct by our suppliers and partners.

### 4. Scope and application

We are committed to upholding this Human Rights Policy across its entire value chain, which includes our own operations, supply chains, and the communities we are active in. This commitment is fundamental to both what and how we conduct our business.

We acknowledge the importance of reviewing our own purchasing practices as a lever for driving systemic change. While striving to achieve our goals through reasonable measures and collaboration with stakeholders, we recognise that our ability to control impacts, particularly outside our direct operations, is subject to practical, economic, and external limitations.

## 5. Human Rights Due Diligence (HRDD)

We conduct ongoing HRDD across our value chain, suppliers, and materials, to identify and address actual or potential negative human rights and environmental impacts. This process is dynamic, adjusting based on operational context, risk, business relationships, and the nature of our involvement.

We integrate stakeholder and expert feedback to continually refine our approach. HRDD requires specific attention during key business junctures, such as forming new partnerships or changes in our operating environment, as these situations can introduce new potential or actual human rights impacts.

### **Integrating HRDD outcomes:**

The findings of our due diligence inform and integrate into our policies and internal systems. This involves:

- Identifying and assessing impacts.
- Taking necessary action on our findings, including providing remediation where necessary.
- Tracking and measuring the effectiveness of our actions.
- Maintaining open communication with our stakeholders.

### **Focus and remediation:**

Our primary focus is on salient human rights issues, those with the highest risk of severe negative impact. We regularly review these issues, concentrating specifically on labour rights within our operations and value chains, given our business context.

When human rights are negatively impacted, our involvement in remedy is determined by our connection to the harm, the significance of the harm, and the relative context. We work to prevent and mitigate prioritised impacts and are accountable for how we address them.

## 6. Communication and compliance

The Human Rights Policy is accessible to all stakeholders, both internal and external. Ace & Tate transparently communicates performance and impact on human rights through its [Annual Responsibility Report](#).

Compliance is monitored using control mechanisms such as ethical and environmental audits, training and ESG supplier meetings. Ace & Tate is responsible for following up on the progress of all commitments, goals, and ambitions outlined in this policy.

### Colleagues

Respect for human rights is fundamental to all our operations and relationships, encompassing our colleagues, people across our value chains, the communities we impact and our customers. We are guided by a commitment to equality, fairness, and safety, maintaining a zero-tolerance policy for discrimination, harassment, or retaliation.

We are dedicated to creating safe, fair, healthy, and inclusive workplaces. This commitment covers all aspects of employment, from wages, working hours, and the right to freedom of association, to professional development and the right to speak up.

### People across our value chains

We continue to work diligently to ensure human rights are respected throughout our value chains, including our manufacturing supply chain and partners who provide services to our stores, our HQ, and customers. We engage with suppliers to ensure all workplaces provide safe, fair, and equal working conditions, respect work-related rights, and encourage people to speak up.

- **Environmental responsibility:** Environmental issues in our operations and value chains that severely impact people and communities are within the scope of this work.
- **Capacity building:** Beyond annual ethical audits, we invest with our suppliers in programs and capacity building for complex areas like working conditions to strengthen supplier responsibility for upstream supply chains.

## **Communities**

We respect the human rights of all people in communities directly or indirectly affected by our operations.

We are committed to meaningful engagement, ensuring community voices are heard and respected, particularly regarding land rights and access to a clean and healthy environment.

## **Our customers**

Customers are central to our business, and we are committed to respecting the human rights of the people we interact with.

Our focus includes providing safe products and services, protecting customer privacy, ensuring responsible advertising, combating discrimination and advancing inclusion.

In our ethical marketing policy, we express our commitment to honest and ethical marketing practices and ensuring our brand promotion remains ethically sound across all our marketing channels and public relations activities across all our audiences.

## Feedback

We welcome open and constructive dialogue, as it is vital for ensuring the policy's ongoing efficiency and effectiveness. Please direct any feedback, suggestions for improvement, or queries regarding this policy to us.

This policy will undergo regular review to align with any changes in our business model or operating environment, thereby guaranteeing its continued effective implementation.

The latest update to this policy was made in February 2026.

**ace & tate**