# WESTWING

# Sustainability Policy

October 2024

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# 01 Introduction

Westwing is Europe's No. 1 in Beautiful Living eCommerce — a premium one-stop destination for design lovers. As our business continues to evolve, expanding from our origins of an online home shopping club, selling 3rd party stock on-demand, to a premium product brand and one-stop destination with a permanent assortment and even physical stores, we acknowledge the critical importance of embedding sustainability into our overarching business strategy and value chain. This commitment is particularly vital in areas where Westwing has significant influence, such as within our operations and our private label product brand, the Westwing Collection.

We believe there is a sustainable way to Live *Beautiful*, which is why Westwing is dedicated to conducting its operations with integrity, and championing environmental and social responsibility and corporate governance.



# 02 Purpose

Westwing perceives sustainability leadership as not only a business imperative but also an opportunity, a means of risk mitigation, and an intrinsic facet of our core values. We aspire to adopt best practices and evaluate environmental, social and governance (ESG) factors in decision-making, recognising their evolving nature. This Sustainability Policy (hereinafter referred to as "Policy") articulates our company-wide endeavours and commitments placing special focus on ESG material topics as identified through periodical materiality assessments. The Policy also sets out how sustainability considerations are integrated into our business management approach and guides us in preventing impacts, addressing risks, and seizing opportunities. By aligning with key ESG principles and commitments, Westwing aims to contribute positively to society while ensuring the long-term sustainability and success of our business.

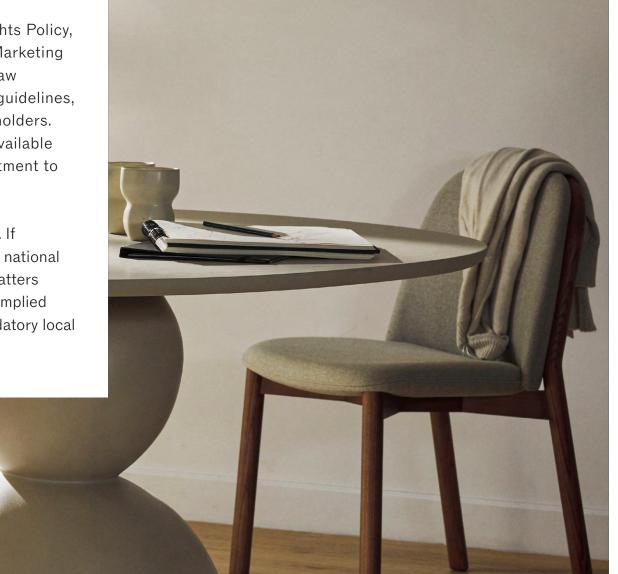
This Policy is subject to regular review to ensure that present and emerging standards and regulations, stakeholder requests and best practices in the field are taken into account.

# 03 Scope of Application

This Policy outlines the foundation of Westwing's sustainability commitments and applies to all Westwing Group entities (hereinafter referred to as "Westwing") and their employees in any physical location in which work-related activities are performed under the control of the organisation (hereinafter referred to as "workplace"). We expect the different business units within Westwing to utilise this Policy as a compass for integrating ESG and sustainability considerations into their respective decision-making processes. We expect that our suppliers and business partners across our own operations, upstream and downstream value chain who maintain business relations with Westwing also adhere to similar standards as the ones set out herein. We strive to ensure this by integrating our Business Partner Code of Conduct and Private Label Supplier Code of Conduct into our business relationships with our partners and suppliers.

This Policy complements other company policies and guidelines such as our Codes of Conduct, Human Rights Policy, Environment, Health and Safety Policy, Responsible Marketing and Communications Policy, Anti-corruption Policy, Raw Material Sourcing Policy, and Sustainability labelling guidelines, ensuring transparency and accountability to all stakeholders. It is publicly available on our website, and internally available through our policy manager tool reflecting our commitment to openness and continuous improvement.

This Policy sets out Westwing's sustainability standards. If provisions in other laws, regulations, or rules, be it local, national or international, have a more stringent position to the matters mentioned in this Policy, those shall be observed and complied with. In cases of conflict between this Policy and a mandatory local regulation, the local regulation shall prevail.



# 04 Commitments

#### We strive to:

- assess the ESG factors influencing our own operations and our value chain (upstream and downstream),
- integrate sustainability considerations across all aspects of our business, from investment decisions to operational processes,
- identify sustainability-related impacts, risks and opportunities in the short-, medium-, and long-term,
- set out how these impacts, risks and opportunities are governed and managed by Westwing,
- apply a robust sustainability framework to address these impacts, risks and opportunities,
- promote best practices with respect to sustainability and risk management across Westwing,

- accommodate the diversity of business models, resources, legal and regulatory requirements within Westwing and across our value chain,
- provide clear directives to stakeholders, outlining our sustainability approach,
- continually enhance our business practices with a view to achieving sustainable growth, creating value for our stakeholders, and driving positive social and environmental impacts.



### Accountability

We hold ourselves accountable to internationally recognised principles, standards, and conventions while adhering to relevant regulatory requirements and industry best practices, as appropriate. In alignment with those, we acknowledge and commit to:

- The Paris Agreement on climate change and the United Nations Sustainable Development Goals which drive our dedication to a healthy environment, rational consumption of resources, a safe and inclusive workplace with high job satisfaction, and the protection of human rights along our value chain in the context of climate and sustainability.
- The Science Based Targets initiative (SBTi) which sets ambitious emissions reduction targets aligned with climate science, striving to contribute to limiting global warming to 1.5°C.
- The Universal Declaration of Human Rights, which serves as the foundational framework for our commitment to human rights adherence.
- The United Nations Guiding Principles on Business and Human Rights, guiding our human rights due diligence and risk assessment processes.

- The United Nations Convention on the Rights of the Child.
- The United Nations Convention on the Elimination of All Forms of Discrimination Against Women.
- The International Covenant on Civil and Political Rights, reinforcing our commitment to civic freedoms and non-discrimination.
- The International Labour Organization (ILO) fundamental conventions, which underpin our stance against child and forced labour and our promotion of decent working conditions.
- The Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.
- The principles of the United Nations Global Compact (UNGC), serving as a cornerstone of our commitment to responsible business conduct.

This Policy underscores our commitment to comply with these specific requirements, which collectively represent the applicable standards within the corporate context at the time of the adoption of the Policy.

## 05 Governance

Governance is based on adherence to sustainability commitments and to all relevant company policies including the Code of Conduct, on the management and mitigation of identified risks to drive continuous improvement, and on transparent monitoring and reporting.

- The Supervisory Board with its respective committees provides oversight of the Sustainability Strategy including the Climate Transition Plan and related targets, monitors progress on the sustainability agenda, critical sustainability impacts, risks, and opportunities, policy effectiveness and sustainability metrics, approves financial and business plans and the Management Board's ESG remuneration targets, and deals with corporate culture aspects.
- The Management Board is directly responsible for adherence to sustainability principles and commitments in line with all applicable policies and Westwing's Code of Conduct, approves and executes the Sustainability Strategy and the

respective targets, ensuring their integration into day-to-day business operations.

- The Sustainability Steering Committee, comprising the Management Board, selected members of the Executive Team, the VP Legal and the Corporate Sustainability team, oversees the target setting process, monitors progress on the Sustainability Strategy and material sustainability impacts and risks, provides oversight for sustainability topics and aims to ensure that they are considered in business strategy and long-term decision-making and aligns these together with the Executive team on a per need basis.
- The Executive Team monitors progress on the Sustainability Strategy.
- The Corporate Sustainability team develops the Sustainability Strategy and the respective targets, key performance indicators (KPIs) and plans, engages with stakeholders on sustainabilityrelated topics, drives the strategy implementation, and reports on progress and sustainability-related impacts, risks, and opportunities to the Steering Committee and the Supervisory Board and its respective committees. It also performs regular monitoring of the impacts, risks and opportunities linked to material topics, analyses them against the sustainability commitments and stakeholder requirements and proposes modifications to how these are managed, if necessary.

- The Governance, Risk and Compliance team is responsible for the establishment of internal controls with respect to sustainability and for the inclusion of identified sustainability material risks in the company's risk register.
- All team members have responsibility for implementing this Policy, and the Sustainability Strategy, and for ensuring compliance with relevant laws and regulations, including providing effective remedies to the issues raised.



## 06 Impacts, Risks and Opportunities

We recognise the critical importance of assessing and addressing sustainability impacts, risks, and opportunities which can stem from both internal factors such as operational practices, and external factors like regulatory changes and supply chain dynamics. These risks encompass ESG considerations, reflecting our commitment to responsible business practices.

Environmental: Environmental risks, including those related to climate change and resource use, have the potential to impact our operations, supply chains, and overall business resilience. By proactively addressing these risks and transitioning towards a low-carbon trajectory, we not only mitigate potential adverse effects but also uncover opportunities for innovation and growth. Transitioning to sustainable practices not only aligns with regulatory requirements but also safeguards our licence to operate, ensuring compliance and enhancing our reputation.

- Social: Social risks such as labour practices, health and safety concerns, data security and privacy can significantly impact employee well-being, customer loyalty, community relations, and brand reputation. Embracing diversity and inclusion, ensuring the health and safety of our employees and customers, and upholding human rights principles in our own operations and across our value chain are integral to our commitment to social responsibility, fostering a positive workplace culture, enhancing stakeholder trust, and driving sustainable growth.
- **Governance:** Governance risks, encompassing issues like board oversight, transparency, and the integration of sustainability considerations into our business practices, are crucial for maintaining trust and accountability. Robust governance practices not only mitigate legal and reputational risks but also foster long-term value creation.

### Our approach

Our approach to sustainability aims to address environmental, social and governance-related impacts, risks and opportunities. It includes reducing our environmental footprint, respecting human rights, promoting diversity, fostering employee engagement, ensuring supply chain transparency, maintaining compliance, and conducting our business in an ethical manner. It also includes advocating the adoption of our sustainability commitments and practices by our brand partners and other suppliers.

- Environmental Responsibility: This pertains to the impact of our business practices on the environment and vice versa. We strive to balance energy consumption, resource utilisation, waste generation, and climate risks, aiming for sustainable and profitable operations while recognizing the necessary trade-offs in minimising planetary impact.
- Social Accountability: This concerns the influence of our operations on our people, customers, value chain and the communities where we operate. Our social policies aim to nurture a positive corporate culture and foster constructive relationships with our stakeholders.
- Governance Integrity: This involves our operational and risk management practices, ensuring they promote sustainability and the enduring success of our organisation. Our governance policies delineate decision-making processes, business strategy formulation, compliance with relevant laws, regulations, and transparent communication of our progress.

### Relevant Stakeholders

We recognise that proactively managing ESG impacts, risks and opportunities is pivotal for long-term value creation for our employees, customers, investors, shareholders, brand partners and other suppliers, the communities in which we operate and other stakeholders. Consequently, Westwing integrates sustainability and ESG principles into its activities, with focused attention on various aspects concerning different stakeholders, as elaborated below:

#### a) Employees

- Enabling a high-performance culture, fostering a resultsdriven environment that encourages innovation, creativity, and accountability.
- Providing continuous development opportunities through structured feedback, challenging tasks, internal opportunities and a targeted Learning & Development offering, empowering employees to grow personally and professionally.
- Cultivating a collaborative and supportive workplace, where teamwork, open communication, and candid feedback are valued.
- Promoting equal opportunities and upholding diversity, nondiscrimination, and inclusion across gender, race, age, sexual orientation, and other identities.

- Ensuring a safe and healthy workplace, offering health initiatives both for physical and mental wellbeing.
- Ensuring adherence to our principles and commitments as outlined in our Code of Conduct, Human Rights Policy, Environment, Health and Safety Policy, and Anti-Corruption Policy.

### b) Customers

- Offering beautifully designed products that align with our purpose of exciting people to create homes that unlock the full beauty of life, while emphasising quality and sustainability.
- Providing accurate, sufficient, and appropriate information to ensure usability and enhance customer experience.
- Offering products and services with accurate, sufficient, and appropriate information ensuring usability for our customers.
- Striving to provide accessible customer service support, where applicable, with the view of also addressing the needs of more vulnerable or socially excluded customer groups.
- Safeguarding customer privacy and personal information through robust security measures.
- Ensuring adherence to responsible marketing and communication as per our policies and ethical standards.

### c) Shareholders/Investors

- Prioritising long-term financial value creation through responsible and sustainable business practices.
- Providing comprehensive, clear, and accurate ESG information in our financial disclosures and other communications, demonstrating how our ESG efforts contribute to value creation.
- Engaging with rating agencies to ensure transparent reflection of our ESG performance.
- Adhering to ethical and responsible conduct principles as outlined in our Code of Conduct and Anti-Corruption Policy.

### d) Brand partners and other suppliers

- Ensuring ethical, law-abiding conduct from our brand partners and other suppliers as per our Private Label Supplier and Business Partner Codes of Conduct.
- Identifying, prioritising, monitoring, and controlling supply chain risks for Westwing Collection products.

- Striving to procure materials for our Westwing Collection that meet our sustainability standards.
- Ensuring adherence to ethical and responsible conduct principles outlined in our Private Label Suppliers and Business Partner Codes of Conduct, our Human Rights Policy, and our Anti-Corruption Policy.

### e) Communities

- Supporting the social and economic development of the communities where we operate by fostering local employment and sourcing opportunities.
- Ensuring our operations and activities respect the rights and well-being of community members, minimising any negative environmental and social impacts.
- Collaborating with local stakeholders and organisations to create positive, long-lasting community relationships and drive sustainable outcomes.

# 07

### Sustainability monitoring & training

Westwing has set ambitious sustainability targets aligned with the United Nations' Sustainable Development Goals for 2030 and the Climate Goals of the Paris Agreement. These targets are measured using KPIs, with select sustainability KPIs integrated into the remuneration system for the Management Board by the Supervisory Board.

To fulfil EU and national legal requirements, we transparently publish relevant sustainability and ESG-related targets, initiatives, and KPIs in our Annual Management Report. This information is based as appropriate on relevant ESG reporting frameworks and standards, such as the United Nations Global Compact (UNGC) and Global Reporting Initiative (GRI), and undergoes limited assurance by an external auditor before being made available on our website. Additionally, we release a comprehensive Sustainability Report annually to provide transparent insights into sustainability and ESG-related topics for all our stakeholders. Both the Annual Management Report and the Sustainability Report are compiled with input from all Westwing departments across all entities and countries.



# 08 Training

Westwing ensures that all its employees benefit from ESG training sessions:

- As part of the onboarding process, each new entrant receives introductory information on Westwing's sustainability goals and targets.
- Company-wide webinars ("Insight Sessions") are organised at least twice a year where employees receive information on the yearly sustainability initiatives and targets and have the opportunity to ask questions.
- The sustainability-related policies are part of Westwing's policy manager tool and employees are required to familiarise themselves with those and answer the relevant questionnaire.



### 09 Compliance

We constantly work to comply with all applicable laws and regulations in the markets in which we operate. We establish and maintain appropriate compliance programs to ensure management and employees' involvement in, and oversight of, sustainability matters. As part of our compliance programs and in the spirit of open communication and continuous improvement, we encourage all employees to report any issues pertaining to this Policy to their leadership. Employees may also use our whistleblower tool to report any violations. Anonymous reporting is available in this case. We assure the confidentiality and protection of any team member or external stakeholder who makes a disclosure in good faith about a violation of this Policy. Any practices or processes not in compliance with this Policy are evaluated and addressed accordingly. Subject to local laws and regulations, a violation of this Policy can result in disciplinary action.

Westwing reserves the right to terminate business relations with a brand partner or other supplier in cases of serious and persistent non-compliance with the provisions of this Policy.

<sup>1</sup> Whistleblower Software



# 10 Focus Topics

Our company is committed to regularly assessing the materiality of various sustainability topics and adjusting its overall strategy around sustainability-related topics, targets, and policies accordingly. The impacts, risks, and opportunities listed below serve as indicators and may not cover all business aspects comprehensively. Our commitments are focused on topics that reflect Westwing's current priorities and are subject to review and updates.

### Climate change mitigation

### Impacts, risks and opportunities

Our company is dedicated to combating climate change and reducing our environmental impact throughout our own operations and value chain. We aim to increase energy efficiency, renewable energy sourcing, and stakeholder trust while meeting consumer preferences for low carbon footprint and locally-sourced products. Despite challenges, we are committed to estimating our carbon footprint and minimising our impact on climate. We are mindful of transition risks posed by regulatory changes, availability of decarbonization technologies, shifting consumer preferences and environmental concerns of the society. We are also aware of physical risks associated with climate change such as water scarcity, heatwaves, extreme weather events and potentially shifting customer demands. Continual monitoring and adaptation of our business strategy is integral to effectively mitigating these risks.

### Commitments

At Westwing, taking action against climate change and reducing our energy usage are fundamental. To achieve this, we focus on:

*Emissions Reduction:* Science-based emissions reduction targets, across all operations and key value chain stages, form the basis for our long-term sustainability objectives. We collaborate with suppliers to promote the adoption of climate change targets, fostering collective efforts to reduce emissions.

*Energy Efficiency and Renewable Energy:* We prioritise energy efficiency improvements throughout our operations, aiming to reduce overall energy consumption. Additionally, increasing the share of renewable energy sources in our operations is a key focus to drive emissions reduction.

*Sustainable Product Development:* We strive to consider known environmental impacts during product development and address them through responsible material sourcing.

*Efficient Logistics and Operations:* We prioritise waste reduction and more sustainable practices across operations, including exploring low-emission transportation options across our value chain. Through efficient logistics management, we optimise resource utilisation and minimise emissions throughout our supply chain.

*Climate Risk Management:* Proactively managing climate-related risks, impacts, and opportunities throughout the value chain is essential to our strategy. By embedding these considerations into our business planning, we enhance our resilience against potential disruptions and capitalise on new opportunities.

Residual Emissions Management and Mitigation Strategies: We consistently evaluate opportunities to address our residual emissions, including biological or technological removals, as well as carbon compensation, to further mitigate our environmental impact.

*Climate Change Adaptation:* As part of our response to evolving climate conditions, we actively adapt our sourcing practices, logistics, and infrastructure. This includes diversifying suppliers, preferring local sourcing, and considering long-term climate vulnerabilities to ensure operational continuity and reduce risks.

*Innovation and Collaboration:* By continuously seeking innovative approaches within our operations and supply chain, we contribute to both climate mitigation and adaptation efforts. Collaborative partnerships also play a critical role in accelerating these solutions.

*Emission Reporting and Transparency:* We calculate, audit and publicly report our annual greenhouse gas emissions, showcasing our dedication to accountability and building trust with stakeholders by demonstrating our progress towards targets.

*Management Accountability:* We integrate CO2 reduction targets into long-term management incentive plans ensuring management accountability.

### Circular economy and resource use

#### Impacts, risks and opportunities

Our commitment towards circularity focuses on enhancing product longevity and sourcing sustainable materials for our Westwing Collection, implementing recycling and repair initiatives, minimising waste, and maximising resource efficiency across our operations, fostering innovation. Despite challenges such as limited systemic adoption of circular practices, and potential supply chain disruptions we see opportunities for advancement. Circular initiatives can lead to cost savings, improved efficiency, reduced environmental impact, increased customer loyalty and business growth. Adapting to regulations, changing consumer preferences and reevaluating operations further drives efficiency and cost savings.

#### Commitments

*Product Longevity and Circular Design:* We prioritise product durability through high-quality design and are exploring circular design principles such as repairability. We also explore standardised labelling for recyclable materials options for packaging.

*Innovation:* We integrate more sustainable innovative materials into product development, guided by a sustainable material library. Additionally, we are expanding our repair services to extend product life cycles.

*Sustainable Material Sourcing:* We are dedicated to reducing our reliance on virgin resources promoting the use of secondary (recycled) resources and exploring sustainable alternatives for our Westwing Collection products and our packaging. This includes increasing the use of plastics with post-consumer recycled content and embracing renewable resources such as bio-based materials. We also strive to increase the traceability of the raw materials used. *Waste Management Hierarchy and Resource Efficiency:* We reduce waste that is material to our businesses through sustainable packaging strategies that enhance recycling, reduce single use plastic and include recycled packaging. We address other waste (warehouse/offices) through waste separation initiatives aimed at improving recycling and recovery rates.

*Promoting Resource Efficiency:* We promote resource efficiency throughout our operations and value chain to minimise environmental impact and optimise resource utilisation.

### Own Workforce

### Impacts, risks and opportunities

At Westwing, we are committed to fostering a high-performance culture that encourages accountability, creativity, and innovation. Poor working conditions are contradictory to our values and can lead to legal liabilities, reputational damage, and reduced morale and productivity. This is why we prioritise creating an environment that fosters wellbeing, collaboration, and continuous development. By proactively addressing risks through our commitment to employee rights, health and safety, and inclusion, we build resilience and safeguard our long-term success. Adhering to our Code of Conduct, Human Rights Policy, and Environment, Health and Safety Policy, we remain a competitive employer, attracting and retaining top talent while safeguarding our business integrity and minimising potential legal and reputational risks.

#### Commitments

*High-Performance Culture:* We are committed to fostering a results-driven environment where employees are empowered to perform at their best. We prioritise clear goal setting and transparent communication to drive performance, ensuring that individual contributions are aligned with organisational objectives.

*Continuous Development:* We prioritise candid feedback and targeted Learning & Development offering where needed, designed to empower every employee to excel, regardless of their background. By offering tailored growth opportunities and challenging tasks, we ensure that everyone, no matter their role or career stage, has the chance to develop their full potential.

*Collaborative Workplace:* We cultivate a collaborative workplace where teamwork, open communication, and mutual support are essential to driving high performance. By fostering an environment of candid feedback and cross-functional collaboration, we ensure that our collective efforts lead to achieving our shared ambition.

*Equal Opportunities, Diversity and Inclusion:* We are committed to creating a diverse, inclusive environment where all individuals regardless of gender, race, age, sexual orientation, or background - can thrive. Our recruitment, promotion and compensation processes are performance-based, designed to foster an inclusive environment with equal opportunities.

*Policy Commitments for Vulnerable Groups:* We actively prioritise the needs of vulnerable groups within our workforce and continually assess our policies to ensure that all our employees have the resources and guidance they need to thrive. We recognise that parents need flexible arrangements to manage work and family life, young leaders require guidance for their growth, aspiring female leaders benefit from targeted development and visibility, and blue-collar workers face specific challenges related to their roles.

*Healthy and Safe Working Environment:* We guide the health and safety of our employees through comprehensive safety protocols, regular inspections, and ongoing training. Our incident reporting system ensures prompt action, while selected health initiatives emphasise both physical and mental wellbeing.

*Respect for Human Rights:* We have zero tolerance for discrimination and harassment on any grounds including race, age, role, gender, gender identity, colour, religion, country of origin, nationality, sexual orientation, marital status, dependents, disability, union affiliation, social class, or ethnic origin. We further prohibit human trafficking, forced labour, and child labour, aligning our policies with international human rights standards, providing training to raise awareness and complaint procedures for prompt resolution. We ensure strict adherence to all company policies as outlined in our Code of Conduct, Human Rights Policy, Environment, Health and Safety Policy, and Anti-Corruption Policy. Our commitment to these principles reinforces ethical behaviour and promotes compliance across the organisation.

*Employee Rights and Fair Employment:* We prioritise the protection of employee rights and are committed to fair employment practices including fair remuneration. We respect employees' rights to unionise and bargain collectively, following local laws. By adhering to strict labour standards and upholding our Code of Conduct, we create a supportive and legally compliant environment.

### Workers in the value chain

#### Impacts, risks and opportunities

Our company maintains fair and ethical standards throughout our value chain, advancing social responsibility and worker well-being. We are dedicated to upholding labour standards and human rights to strengthen supply chain resilience and build stakeholder trust. Human rights violations not only harm workers and communities but also pose significant risks to reputation, legal compliance, and operational continuity. Through regular audits and robust ethical practices, we are fully committed to minimising risks and eliminating violations. Ensuring fair working conditions is also essential to protect our reputation, foster customer loyalty, and drive long-term business success.

### Commitments

*Human Rights Commitment:* Upholding human rights along our value chain is central to our ethos. We support fair and ethical treatment for all workers, promote inclusivity, and seek to reduce risks of discrimination and harassment. This commitment is reflected in our supplier onboarding processes. Our policies explicitly address issues such as human trafficking, forced labour, and child labour.

*Supplier Audits and Ethical Standards:* We regularly audit our suppliers to enhance their social performance, maintaining a safe and ethical work environment. We also maintain Private Label Supplier and Business Partner Codes of Conduct to uphold these standards.

*Recruitment and Remuneration:* We require that every worker receives fair wages, entitlements to holidays and leave, and clear contracts outlining essential terms.

Working Hours and Freedom of Association: We require that our brand partners and other suppliers adhere to legal requirements regarding working hours, breaks and overtime. Moreover, we recognise and respect workers' rights to association and collective bargaining, and we request that our suppliers uphold these standards in line with international labour conventions. Moreover, we respect workers' rights to association and collective bargaining, and we request our suppliers to uphold these standards in line with international labour conventions.

*Health, Safety, and Environmental Standards:* We conduct regular environmental assessments of key and strategic suppliers, not only to enhance their environmental performance but also to ensure alignment with our values and standards, thereby safeguarding the welfare of workers, communities and the environment.

*Human Rights Monitoring and Remediation:* We have a publicly available channel for reporting human rights concerns. If any issues arise, we stand ready to seek and implement corrective actions to prevent recurrence.

### Customers

#### Impacts, risks and opportunities

As Europe's No.1 in Beautiful Living e-Commerce, we are committed to offering safe, reliable, high-quality products, alongside transparent environmental and social practices, to build lasting relationships. We provide excellent customer service, promptly address concerns, and offer strong support systems, including warranties and efficient product recalls when needed. By ensuring product safety, data protection, and privacy, we not only prevent legal penalties but also build customer loyalty. Tackling risks related to product quality, data protection, data privacy, and sustainability, strengthens our brand, reduces liabilities, and reinforces our position as the *Beautiful Living* company.

### Commitments

*Respect for Human Rights:* We commit to upholding the human rights of consumers and end-users across our operations and value chain, aiming to ensure their health and safety, right to privacy, freedom of expression, access to information, and protection from discrimination and harm. *Consumer Health and Safety:* We prioritise the health and safety of our consumers by providing high-quality and safe home and living products. Our strict safety standards and testing (chemical and physical) for our Westwing Collection products ensure compliance with local regulations in our distribution countries. We also carefully select premium, high-quality third-party products that meet rigorous standards. We take proactive measures for any safety concerns, including prompt product recalls and modifications where necessary.

*Online Well-Being and Safety:* We are dedicated to maintaining a positive and safe online environment. We strive to put measures in place to prevent harassment and discrimination, ensuring a welcoming and respectful digital space for all users. We respond swiftly to safeguard vulnerable groups and uphold a supportive online community.

Accessibility and Social Inclusion: We comply with legal accessibility requirements across our products, digital platforms, and on-site communication. In doing so, we strive to provide nondiscriminatory and equal access in line with regulatory standards.

*Data Privacy:* We comply with all applicable data protection laws and regulations, and we are committed to protecting the personal

data of our users, employees, suppliers and brand partners. We have appointed data protection officers for the countries we operate in and implement adequate IT security measures, which are regularly reviewed and updated. An internal process is in place to ensure that software tools are thoroughly vetted from both legal and IT security perspectives before procurement. We also commission annual data protection and IT security audits by external auditors and promptly address any findings.

*Transparency and Fairness:* We provide clear, accurate sustainability information about our products and services backed by solid evidence and/or certifications, avoiding deceptive marketing practices. Our fair marketing practices focus on empowering users to make informed decisions and promote more sustainable choices, as applicable.

*Engagement with Customers:* Through active engagement and feedback mechanisms, we collaborate with our customers to understand their needs, preferences, and concerns. We promote open communication and establish mechanisms for reporting any violations or potential human rights impacts associated with our offerings.

### Business conduct

#### Impacts, risks and opportunities

Our company is deeply committed to ethical business practices, transparency, and legal compliance to cultivate trust, integrity, and fairness across our operations and value chain, acknowledging the challenges and opportunities they present. By consistently upholding our values, including investments in sustainability initiatives and adherence to certifications and standards, we aim to conduct our business ethically, not only to minimise risks such as legal repercussions or damage to corporate governance, but because it is integral to our company's values. By doing so, we also capitalise on opportunities to enhance our brand reputation, strengthen stakeholder trust, and ensure long-term business success.

### Commitments

*Ethical Conduct and Transparency:* We emphasise honesty, transparency, and integrity, ensuring fairness, openness, and accuracy in all operations. Upholding ethical practices and complying with legal requirements are central to our corporate culture. We publicly disclose policies related to business conduct, anti-corruption and anti-bribery measures. We continually assess and refine our corporate culture and policies to align with our values and goals.

*Protection of Whistleblowers:* We foster a culture of accountability and transparency where employees and stakeholders across our value chain (upstream and downstream) feel safe to report suspected violations, including anonymously, ensuring prompt and confidential investigation. Retaliation against whistleblowers is strictly prohibited.

*Corruption and Bribery Prevention:* We have zero tolerance for corruption and bribery, providing comprehensive training to all employees and establishing clear reporting mechanisms. Any violations are thoroughly investigated, and appropriate disciplinary action is taken.

*Incident Management:* Any violation of our Code of Conduct or policies constitutes an incident. When this becomes known, the violation is investigated. We take corrective action to prevent recurrence and ensure compliance with our standards.

*Political Engagement and Lobbying:* Westwing observes neutrality with regard to political parties and candidates and abides by applicable international treaties and national legislation on lobbying activities. Any lobbying related activities, expenditures, positions, and channels are publicly reported. Supplier Relationships and Payment Practices: We prioritise ethical supplier relationships through clear communication and adherence to agreed terms and legal requirements. For our Westwing Collection suppliers, we implement a transparent evaluation system to monitor their performance.

Animal Welfare: We respect the Five Freedoms for animal welfare and maintain a zero-tolerance policy towards cruelty, abuse, and neglect. We are committed to ensuring traceability in our Westwing Collection by sourcing leather from certified tanneries and other animal-based materials from certified suppliers. We focus on certifications that, among other criteria, also take animal welfare practices along the value chain into account.

