



WESTWING

Human Rights policy

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Introduction

At Westwing, we believe that respecting and upholding human rights is fundamental to ethical and responsible business conduct.

As a leading home and living company, we recognize the impact our operations can have on the lives of individuals and communities. For this reason, respect for human rights is also an essential component of the Westwing Group's Code of Conduct and of the Codes of Conduct we have established for our Private Label suppliers and our business partners.

This Human Rights Policy concretizes the above-mentioned Codes of Conduct and embodies our unwavering commitment to promoting and protecting human rights throughout our business endeavors.



02

Purpose

Our Human Rights Policy serves as a cornerstone of our corporate values and practices as also manifested in the Codes of Conduct. Its purpose is threefold:

Commitment

To reaffirm our steadfast commitment to upholding human rights and ethical conduct within our organization and throughout our value chain by making our employees, suppliers and business partners sign the respective Codes of Conduct as an essential part of their onboarding processes.

Guidance

To provide clear guidance to our employees, suppliers, business partners, and other relevant stakeholders on the principles and standards that underpin our approach to human rights.

Accountability

To hold ourselves accountable to internationally recognized human rights principles, standards, and conventions while adhering to relevant regulatory requirements and industry best practices, as appropriate.

In alignment with internationally recognized standards and principles, we acknowledge and commit to:

- 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 labor and our promotion of decent working conditions.
- OECD Guidelines for Multinational Enterprises.
- The principles of the United Nations Global Compact, serving as a cornerstone of our commitment to responsible business conduct.
- The Paris Agreement on climate change and the United Nations Sustainable Development Goals, driving our dedication to a healthy environment and the protection of human rights in the context of climate and sustainability.
- Other relevant international conventions and standards that contribute to our comprehensive approach to human rights and ethical business practices.

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

03 Scope of Application

This Policy sets out the basic principles underlying Westwing's Human Rights commitments and applies to all Westwing Group companies (hereinafter referred to as "Westwing") and their employees in any physical location in which work-related activities are performed under the control of the organization (hereinafter referred to as "workplace"). We expect that our suppliers and business partners who maintain business relations with Westwing also adhere to similar principles as the ones set out below. This Policy sets out minimum requirements. 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

Principles and Commitments

Human Rights Adherence

Westwing Group is unwavering in its commitment to uphold human rights standards within our organization and throughout our value chain.

Human Rights Due Diligence

We are committed to conducting human rights due diligence and risk assessments related to Westwing Collection products and processes and to identifying major human rights impacts within the respective business activities and value chain. Main risks linked to human rights are to be embedded in our corporate risk management and internal control system. We strive to provide effective remedy to every salient negative human rights issue that was identified by Westwing or raised by relevant stakeholders.

Child and Forced Labor

We strictly prohibit any form of child and forced labor, and slavery within our own workforce and demand the same commitment from our partners and suppliers, adhering to the International Labour Organization's (ILO) fundamental conventions.

Human Trafficking

We maintain a zero-tolerance stance towards human trafficking in all its forms, in accordance with all applicable laws and regulations and consistent with international standards.

Non-Discrimination

Westwing firmly rejects any form of discrimination across its value chain, and strives to promote diversity and inclusion. We have zero tolerance for harassment and take appropriate measures to prevent such behavior.

Inclusivity

Westwing ensures that no one is left behind in our pursuit of human rights excellence.

Local Community Engagement

We aim to support and respect human rights within local communities, including the protection of civic freedoms such as free expression and assembly. We do not tolerate any threat or abuse against human, civic rights and environmental defenders.

Customer and Data Privacy

Westwing and its management consider the protection and security of personal data to be crucial. Among other things, our rules and procedures aim to ensure that all personal data handled by Westwing is secure and protected in line with all applicable data protection laws.

Product information

Westwing fully admits the right of its customers to access information about its products, including safety characteristics. We maintain reliable customer feedback channels to address any such issues.

Artificial Intelligence (AI) usage

We acknowledge the ethical implications of AI and are committed to using AI systems responsibly and ethically, avoiding any actions that could harm others, violate human rights and privacy so as to avoid any potential negative impacts to society. For this, an Artificial Intelligence Usage Guideline has been developed and launched.

Value Chain Integration

We engage with our Westwing Collection suppliers to identify, assess, and mitigate human rights risks, including related to workers in the value chain, in line with best practices for social audits and human rights due diligence. We make human rights adherence a minimal safeguard for our sourcing policy.

Stakeholder Engagement

We strive to engage with relevant stakeholders in discussions related to our human rights agenda. Our aim is to address stakeholders' requests and concerns effectively, as recommended by the United Nations Global Compact.

Collaboration

We are determined to collaborate with industry peers on human rights matters to seek common solutions, aiming for protection of human rights across all levels of business, consistent with industry best practices.

Transparency

We are committed to transparently reporting on material human rights issues, demonstrating our dedication to accountability to internal and external stakeholders and continuous improvement.

Human Rights Training

We actively explore opportunities to integrate human rights considerations into our training initiatives across our operations and supply chain. These efforts are part of our commitment to fostering a culture of respect and responsibility within the organization.

05

Governance

Governance is based on Human Rights adherence monitoring and the management and mitigation of identified risks to drive continuous improvement. Our management board is accountable for Human Rights adherence. The operational management has responsibility for Human Rights adherence and reporting, for implementing this policy and for ensuring compliance, including providing effective remedy to the issues raised.

The Sustainability Steering Committee provides oversight for human rights topics and aims to ensure that they are considered in business strategy and long-term decision-making and aligns these together with the management board on a per need basis.

Every team member at all levels shall act in accordance with our Human Rights commitments.

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

06 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, human rights issues. As part of our compliance programs and in the spirit of open communication and continuous improvement, we encourage all employees to report any human rights issues to their local management teams.

Westwing reserves the right to conduct external audits on human rights issues among its suppliers and business partners to ensure that they comply with the principles and commitments of this Policy.

Violations of this Policy can also be reported through our [whistleblower tool](#). Anonymous reporting is possible. We will 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 will be 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 supplier in cases of serious and persistent violations of basic human rights.

