



WESTWING

Code of Conduct

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I. Purpose of our Code of Conduct

Westwing is committed to conducting its business with integrity, in a lawful and ethical manner. This Code of Conduct sets out the basic principles underlying this commitment and provides guidance to all our employees (including our management and Management Board members; in the following “Employees”). For our suppliers and other business partners, Westwing provides separate Code of Conducts they shall adhere to.

II. Scope of application

This Code of Conduct applies to all Westwing Group companies hereinafter referred to as “Westwing” and their Employees. This Code of Conduct sets out minimal requirements. If mandatory provisions in other laws, regulations or rules, be it national or international, have a more stringent position to the matters mentioned in this Code of Conduct, those shall be observed and complied with. In cases of conflicts between this Code of Conduct and applicable mandatory local regulation, the local regulation shall prevail.

III. Commitment to this Code of Conduct

Westwing requires all Employees to:

- read and understand the Code of Conduct; and
- ensure that both the content and the purpose of the Code of Conduct are acted upon.

IV. Sanctioning of violations

Westwing strives to prevent violations, for example by training of Employees and having clear policies and guidelines in place. However, in case a violation is detected, Westwing takes appropriate actions. This may include remedial and / or disciplinary actions against the Employee (like warnings, initiation of criminal proceedings and /or terminations) depending on the single case.

V. Conducting business in an ethical and lawful manner

Westwing is committed to conducting its business with integrity, in a lawful and ethical manner. Therefore, Westwing takes especially care of the following:

1. Conflicts of interest

Westwing takes conflicts of interest seriously and expects Employees to make business decisions always in the best interest of the company. A conflict of interest can arise when personal or financial interests overlap with job responsibilities at Westwing. Even the appearance of a conflict of interest can undermine trust. Please find more details on our Intranet: [Conflicts of interest](#).

All Employees are responsible for proactively disclosing any potential conflict, either personal or organisational. Please reach out to compliance (compliance@westwing.de) in case of a conflict of interest.

2. Corruption and bribery

At Westwing, we value a culture of integrity and have zero tolerance for corruption. Therefore, bribery and corruption in any form are strictly prohibited.

Westwing's Anti-Corruption Policy applies to all Employees when interacting with business partners, public officials and other individuals. Employees must not bribe or accept bribes. Employees shall ask themselves before offering or giving money or anything else of value to any person in a business context if this could be viewed as having an illegitimate purpose. If the answer is yes, the Employee must not proceed, even if the benefit is of low value.

Employees must as a general rule never offer money or any advantage for personal gain to an official or employee of a governmental entity. Westwing will take disciplinary action against Employees who are found to be giving or taking bribes or who offer, promise, or give any improper or corrupt financial or other advantage. This may lead to dismissal or termination of employment and, if appropriate, criminal proceedings.

3. Gifts, hospitality and entertainment

No Employee of Westwing may offer or give to, ask or accept from, directly or indirectly, gifts or invitations (including hospitality and / or entertainment) any third party, unless it can be constituted as being within the boundaries of accepted business practices in line with the internal Compliance regulations. Detailed rules and information on gifts, hospitality and entertainment and processes can be found in the Anti-Corruption Policy.

4. Political contributions, donations, and sponsorship

In a business context employees shall avoid any political contributions, charitable donations, or sponsorships that would intend to, or give the appearance of intending to, gain an unfair

competitive advantage or exercising improper influence. All planned sponsoring, donations and political contributions need to be reported to compliance@westwing.de upfront and need the prior approval(s) according to the requirements of the Anti-Corruption Policy.

5. Supplier and business partner relationships

Westwing is committed to the fair treatment of its suppliers in compliance with antitrust and competition laws. Our contractual relationships with suppliers and other business partners are important elements of the company's success.

Selection of supplier and other business partners and purchasing decisions must be made objectively and in Westwing's best interests by evaluating quality, costs, fulfilment requirements, expected delivery capability, and other relevant factors. Westwing, overall, forbids unlawful or unethical business practices. Negotiations with suppliers and other business partners should be conducted in a professional manner, with the use of the four-eyes principle. Employees must always be sure that business decisions are made without any unjustified influence from a third party. Suppliers and other business partners which are proven to attempt to unduly influence Westwing's purchasing decisions may be excluded from any future transaction with the company.

Westwing expects its business partners and suppliers to agree that Westwing's Supplier / Business Partner Code of Conduct or a comparable code of conduct forms part of the contractual relationship.

Employees can find more details in the [Anti-Corruption/Gift Policy](#).

6. Fair competition

Westwing is committed to fair competition and open markets and to respecting all international and local competition and antitrust laws. We remain firm believers that free and fair competition works in our favour allowing us to provide value to our customers.

We expect all Employees to protect the interests of our customers and to fight against collusive practices and monopoly behaviours.

7. Environment

We all share a joint responsibility towards securing a sustainable future. Westwing strives to operate in a way that is environmentally sustainable in all business activities in accordance with the precautionary principle. At Westwing we aim to reduce our environmental impact and aim for

continuous improvement of our environmental performance. We strive to reduce waste and emissions to air, ground, and water and to contribute to the recycling and reuse of materials and products, reduce energy consumption and strive for more efficient use of resources. Westwing also has contingency plans in place for preventing, mitigating, and controlling serious environmental and health damage from its operations, including accidents and emergencies; and mechanisms for immediate reporting to the competent authorities.

We pay special attention to environmental local laws and regulations, industry standards or other environmental requirements next to international regulations and standards as far as they are applicable to Westwing. Necessary environmental permits, licenses and test reports are obtained and kept up to date. For Westwing, compliance with all applicable environmental laws and regulations is of high importance. Westwing strives to promote sustainability and environmental awareness at all levels.

Westwing also strives to make Employees aware of the environmental impact of their work activities and encourages them to minimize that impact.

VI. Operating with integrity

Westwing is operating with integrity by following strict internal controls and standards.

1. Political involvement

Westwing observes neutrality regarding political parties and candidates and abides by applicable international treaties and national legislation on lobbying activities.

2. Financial Reporting

Westwing is required to follow strict accounting principles and standards to report financial information accurately and completely and to have appropriate internal controls and processes to ensure that accounting and financial reporting complies with legislation.

The integrity of Westwing's financial records is critical to the operation of our business and is a key factor in maintaining the confidence and trust of our shareholders/investors and other stakeholders.

We must ensure that all transactions are properly recorded, classified, and summarised in accordance with Westwing's accounting policies.

No Employee may enter or remove information in the company's books or records that intentionally hides, misleads, or disguises the true nature of any financial or non-financial transaction or result.

Employees involved in financial reporting shall always provide full, fair, accurate, timely and understandable disclosure in reports and documents that Westwing files with, or submits to, investors, government agencies, tax authorities and in other public communications. Comments about financial reporting and prospects to external parties shall only be made by authorised official spokespersons.

3. Handling company assets and information

a) Protection of company property

Westwing expects Employees to treat company property with care and to protect it against loss, damage, misuse, theft, abuse, embezzlement, or destruction and not expose the company to unnecessary costs.

Westwing also expects Employees to use company assets such as information systems, material, equipment, work tools, and office furnishing responsibly and mindfully.

Technical, technological, organisational information, intellectual property and other information of economic value are important assets of our company and must be protected against unauthorised use and disclosure.

b) Protection of intellectual property

Westwing places great value on the protection of intellectual property and encourages Employees initiative, creativity and innovation while safeguarding intangible assets such as inventions, ideas, documents, patents, and other forms of intellectual property relating to Westwing's business.

Intellectual property generally includes everything created using Westwing's business information, time, facilities, or assets or any work on behalf of Westwing.

Westwing expects that the intellectual property of others is also respected and strictly prohibits the unauthorised use, theft or misappropriation of competitor or third-party intellectual property.

c) Data protection/confidential information

Westwing takes its obligations under data protection and privacy laws across the countries where it operates very seriously. Westwing handles personal information about employees, candidates, and customers every day and has the important duty of respecting this information and ensuring it is protected and handled responsibly and only used for the purposes for which it is provided for. To protect Westwing's confidential information, internal procedures and legal standards regarding confidentiality and data protection laws must be respected at all times and all business activities must be accurately and carefully documented. Westwing expects that confidential information of our business partners is respected. Restrictions on sharing confidential information apply until the information becomes public knowledge. Discussing or sharing confidential information in public places should be avoided.

d) Responsible communication

Westwing expects Employees to represent the company and its values respectfully and in a lawful and ethical manner. Business communications should be clear, professional, and protect and mark confidential information according to our internal standards. Only authorised Employees may speak officially on behalf of Westwing. False or misleading statements, advertising, promotions or other communications about Westwing, its product, products-related policies or competitors are strictly prohibited.

4. Ensuring a safe and fair workplace

Westwing is ensuring a safe and fair workplace by promoting an environment that is inclusive of all people.

VII. Human Rights

Westwing is committed to respect and support the Human Rights principles and values laid out in the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights and its related covenants), International Labor Organization's Declaration on Fundamental Principles and Rights at Work, the United Nations Global Compact and the United Nations Guiding Principles on Business and Human Rights.

Westwing conducts business in accordance with all such principles and in compliance with all applicable global and local human rights laws.

1. Equal opportunities/discrimination

Westwing take great pride in promoting an environment that is inclusive of all people and their unique abilities, strengths, and differences. An inclusive and diverse work environment promotes respect and understanding and fosters creativity and innovation. Westwing respects the dignity and human rights of all Employees and all other individuals. Westwing expects that everyone is treated fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, nationality, sexual orientation, marital status, dependents, disability, union affiliation, social class, ethnic origin, or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on merit.

2. Regular employment

Westwing believes that fair and transparent employment relationships are the foundation of a strong and trusted workplace. Every employment relationship is based on recognised legal standards and clearly set out in contracts or letters of employment.

Westwing is committed to treating all employees with respect and integrity. This means Westwing complies with all applicable labour and social security obligations and rejects any practices that undermine fair employment — including labour-only contracting, misuse of apprenticeship programs, or unjustified use of fixed-term contracts.

3. Freedom of association and right to collective bargaining

Westwing respects employees' rights to join or form labour unions and engage in collective bargaining. Westwing complies with local labour laws and provide unions access to their members according to regulations in each country where we operate. Westwing does not discriminate against union representatives.

4. Ensuring a safe and fair workplace

Westwing ensures a safe and fair workplace by adhering to legal regulations, promoting employee health, and providing fair remuneration.

5. Working hours

Westwing does not require employees to work more than the regular and overtime hours permitted by applicable local law. Working hours are set out in employment contracts and are designed to respect legal limits, including responsible management of overtime.

6. Health and safety

Westwing ensures a safe and healthy work environment, with special care for vulnerable Employees like young workers, pregnant women, and those with disabilities. We comply with national occupational health and safety laws, or as the case may be, international standards and guarantees medical assistance and emergency care. Employees have access to drinking water, safe and clean break areas, and workspaces that meet standards for space, ventilation, temperature, light, and noise. Risks are assessed and precautions taken to prevent accidents and illness, while employees receive training and regular safety inspections and emergency drills are conducted. Employees also have the right to leave the workplace if their health or safety is in imminent danger.

7. Remuneration

Westwing is committed to ensuring that all Employees receive fair, transparent, and legally compliant remuneration. Compensation is determined in line with applicable laws, and reflects the skills, responsibilities, and performance of each individual. We reject any form of wage dumping or unfair pay practices and are dedicated to equal pay for equal work, regardless of gender, age, nationality, or any other personal characteristic.

8. Redundancies

Westwing handles redundancies in compliance with all applicable laws and regulations ensuring that proper consultations, selections, confirmations, and appropriate payments, are made.

VIII. Ensuring a safe and fair workplace

Westwing has zero tolerance for any form of harassment whether verbally or physically that violates a person's dignity, affects their work, or creates a hostile, offensive, or intimidating environment. We are committed to providing a safe, respectful workplace and will promptly investigate all reported incidents.

- Examples of prohibited behaviour include bullying in any form and, in particular, humiliating, insulting, and intimidating colleagues
- Abuse of authority, such as using one's position for personal gain or to violate others' rights
- spreading rumours, false information about the company and or coworkers
- unwelcome sexual advances, offensive jokes or inappropriate verbal or physical behaviour of sexual nature
- conditioning benefits or employment decisions or submission to request for dates, sexual favours, or other similar conduct of sexual nature.

These behaviours are unacceptable and will be addressed with appropriate action. Any form of harassment shall always be immediately reported via the [Whistleblower Tool](#).

IX. Whistleblower & Reporting

1. Whistleblower protection

Westwing strictly prohibits any form of retaliation against individuals who, in good faith, report potential violations of the law, our Code of Conduct, or other company policies, or who support an investigation. Retaliation is a serious breach of our Code of Conduct and will not be tolerated. Any suspected retaliation should be reported immediately via the [Whistleblower Tool](#). Those who engage in retaliation may face disciplinary action (like termination).

2. Reporting of compliance violations

All Employees are responsible for reporting any behaviour that may violate this Code of Conduct. Tolerating or ignoring questionable actions—whether explicitly or implicitly—is not acceptable. Reports can be submitted via our [Whistleblower Tool](#) anonymously. All disclosures will be treated confidentially, and employees who report concerns in good faith, are protected from retaliation.