



# WESTWING

## *Business Partner* Code of Conduct

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## Content

01 Introduction .....	1
1.1. Compliance with laws and regulations .....	2
1.2. Compliance with this Policy .....	2
1.3. Reporting violations.....	2
1.4. Sanctioning of violations .....	3
02 Conducting business in an ethical manner.....	3
2.1. Conflicts of interest .....	3
2.2. Corruption and bribery .....	3
2.3. Gifts, hospitality and entertainment.....	3
2.4. Insider trading/dealing .....	4
2.5. Fair competition .....	4
2.6. Environment .....	4
03 Operating with integrity.....	4
3.1. Fraud and money laundering.....	4
3.2. Sanctions and export controls.....	5
3.3. Financial reporting .....	5
04 Handling company assets and information .....	5
4.1. Protection of intellectual property .....	5
4.2. Data protection/confidential information .....	5
4.3. Communication .....	6
05 Ensuring a safe and fair workplace.....	6
5.1. Human Rights .....	6
5.2. Equal opportunities/discrimination.....	6
5.3. Freedom of Association and Right to Collective Bargaining .....	6
5.4. Working hours, wages, benefits .....	7
5.5. Health and safety.....	7
5.6. Harassment-free workplace .....	7
06 Final Provisions .....	7

## 01 Introduction

Westwing is committed to creating sustainable value in the Home & Living sector. As an international company, we rely on the collaboration of our Business Partners to achieve this objective. Westwing seeks to avoid negative impacts from purchasing practices by maintaining long-term and stable business relationships with its Business Partners wherever feasible. This Business Partner Code of Conduct (“Policy”) is the basis for Westwing for any collaboration with Business Partners.

Westwing is committed to respecting internationally recognised human rights and to ensure that it is not in any way complicit in human rights violations. Business Partner must comply with all applicable national and international laws, rules, and regulations. Where these are less stringent than the requirements set out in this Policy, Business Partner shall comply with the provisions of this Policy.

We expect our Business Partners to do the same in line with the principles set out in our Westwing Code of Conduct (the “Westwing Code”), and accessible on our website.

This Business Partner Code of Conduct (“Policy”) summarises the values set out in the Westwing Code as they apply to our suppliers and other third parties (collectively “Business Partners”) who maintain business relations with Westwing, providing a set of governing principles for ethical behaviour when interacting with Westwing or when acting on its behalf.

A “Business Partner” is any company, organisation, entity or person that sells or seeks to sell any kind of product or service to Westwing or any individual or organisation that works or transacts with Westwing, including consultants, agents, business associates, contractors, service providers, who work for and on behalf of, or otherwise transact with, Westwing. This excludes our Private Label Suppliers who are covered by our Private Label Supplier Code of Conduct. Product-specific obligations (e.g., product safety and chemicals, product recyclability, repairability, Extended Producer Responsibility (EPR), timber legality/deforestation-free) apply where partners supply goods or packaging to Westwing or sell goods via Westwing platforms; service-only partners (e.g., agencies, IT, consultants, logistics/3PL) are expected as minimum requirement to meet the legal, integrity, workplace and data-protection standards set out below.

The Westwing Code reflects the universally accepted principles contained in the United Nations Global Compact on human rights, labor, the environment and anti-corruption, and draws upon the International Labor Organization conventions and Universal Declaration of Human Rights. This Policy is consistent with Westwing’s Human Rights Policy, Sustainability Policy, and Raw Material Sourcing Policy.

## 1.1. Compliance with laws and regulations

We require our Business Partners to comply with all applicable laws, rules, regulations and treaties, including but not limited to laws related to anti-bribery, competition, business conduct, product safety, quality and labelling, product chemical restrictions (including REACH and POPs where applicable), environmental standards, EPR obligations where applicable (e.g., packaging, batteries, textiles, electronics, furniture), timber legality and deforestation-free requirements (including, where applicable, the EU Deforestation Regulation (EUDR) for relevant commodities), repairability and other environmental and circularity related details under local laws (like AGECE in France, occupational health and safety, privacy and data protection, labor and employment, and animal-welfare requirements relevant to supplied goods, and any other laws described herein or that are otherwise applicable to the products and/or services they provide to Westwing in all locations in which they conduct business operations.

## 1.2. Compliance with this Policy

This Policy is not intended to replace own policies of our Business Partners or those of their subsidiary businesses, but to act as an additional set of (minimum) governing principles.

We expect our Business Partners to share our commitment to ethical business practices and to have clear policies and procedures in place to ensure they, their employees any subcontractors engaged for work related to Westwing meet the following requirements and, if requested, are able to provide us with necessary information to demonstrate compliance.

Westwing has the right to investigate any reasonably suspected breach of this Policy and reserves the right to terminate its business relationship with any Business Partner who has violated the principles set out below.

The principles herein are not exhaustive. The fact that a topic is not specifically addressed does not relieve our Business Partners of their obligation to maintain the highest ethical standards under any and all circumstances.

## 1.3. Reporting violations

Our Business Partners should report, and act to correct, any suspected violations of regulations, laws or this Policy within a reasonable time frame. Violations must be reported in a timely manner via Westwing's [whistleblowing channel](#), which enables anonymous reporting and protects good-faith reporters from retaliation.

## 1.4. Sanctioning of violations

Westwing takes its responsibility to comply with relevant legal regulations and laws very seriously. Westwing expects the same from its Business Partners. Westwing reserves the right to take appropriate action when a breach or violation of the laws or this Policy becomes known up to and including termination of the cooperation. Depending on the circumstances, Westwing may also suspend cooperation, remove product listings or services, require corrective action plans, and recover costs arising from non-compliance.

## 02 Conducting business in an ethical manner

### 2.1. Conflicts of interest

We expect our Business Partners to avoid conflicts of interest and report any potential or apparent conflicts between their personal interests (including their family members or personal friends) and the interests of Westwing, in a timely manner. Depending on the circumstances, our Business Partners may be required to put in place appropriate measures to manage the conflict of interest.

### 2.2. Corruption and bribery

We expect that our Business Partners do not engage in any kind of corruption, bribery or any activity (including improper payments or the giving or receiving of preferential treatment) that may imply involvement in corruption or bribery in general and especially when working for or with Westwing.

Our Business Partners shall not accept or provide any gifts or favors to or from active or former government officials or commercial parties for or on behalf of Westwing without obtaining prior approval from Westwing.

### 2.3. Gifts, hospitality and entertainment

We will not solicit, nor should our Business Partners provide, any gift and favors (including hospitality) to achieve preferred or approved status in any procurement process. Under no circumstances should our Business Partners give gifts, favors or hospitality that compromise, or could be perceived to compromise, personal judgement, objectivity, independence and the integrity of Westwing, or constitute a bribe. Our Business Partners should take particular care

in any situation where the giving or receiving of gifts, favors or hospitality coincides with a renewal of business relationships.

#### 2.4. Insider trading/dealing

Our Business Partners must not engage in insider trading or dealing. Inside Information are information, which, if they become publicly known, would likely have a significant effect on the Company's share price. Our Business Partners who are in possession of inside information must not buy or sell securities in relation to the company to which the inside information relates or pass that information on to others.

#### 2.5. Fair competition

We expect our Business Partners to comply with laws that protect competition and demonstrate that they compete fairly and ethically and do not engage in any collusive or anti-competitive behavior (such as price fixing) that restricts free and fair competition.

#### 2.6. Environment

Our Business Partners should identify and manage the environmental impacts of their operations, products and services. We expect them to reduce greenhouse gas emissions, use natural resources efficiently, manage waste responsibly, and comply with applicable environmental laws and product-related requirements. Where goods or packaging are supplied to Westwing or sold via Westwing platforms, partners must comply with relevant rules on chemicals and restricted substances, extended producer responsibility, and other applicable laws like timber/forest-derived materials.

We expect our Business Partners to set clear climate targets aligned with international standards and to take measurable action to reduce their greenhouse gas emissions. They are also expected to cooperate with Westwing's reasonable requests for environmental or emissions-related information connected to the products or services they provide.

### 03 Operating with integrity

#### 3.1. Fraud and money laundering

Our Business Partners shall not provide any service, or enter into any arrangement, which facilitates or may constitute Westwing being involved directly or indirectly in economic crime,

including money laundering activities. Our Business Partners shall not channel any funds to, or support, illegal activities (e.g., terrorism, tax evasion, fraud).

### 3.2. Sanctions and export controls

Our Business Partners shall comply with applicable economic sanctions and export control laws and regulations and avoid doing anything that would position themselves or Westwing in violation of applicable economic sanctions and export controls.

### 3.3. Financial reporting

We expect our Business Partners to keep accurate records using recognised accounting standards and security measures. All records created and maintained must be clear, accurate and complete. Our Business Partners shall accept the responsibility to submit correct invoices and/or time records.

## 04 Handling company assets and information

### 4.1. Protection of intellectual property

We expect our Business Partners to respect the intellectual property rights of Westwing and others. This means, for example, that our Business Partners shall not use Westwing intellectual property in a manner that is not authorised by Westwing nor other parties' unlicensed software or technology in support of or in connection with work for or with Westwing.

### 4.2. Data protection/confidential information

Our Business Partners shall handle and disclose personal data and confidential information that they obtain in the course of their relationships with Westwing, only as authorised and directed by Westwing and as required by applicable laws and regulations. Our Business Partners shall protect personal data and confidential information against unauthorised and unlawful use, disclosure, access, loss, alteration, damage and destruction. Where a Business Partner processes personal data on Westwing's behalf, the Business Partner must meet GDPR or equivalent standards, enter into appropriate data-processing terms, maintain proportionate technical and organisational security measures, and notify Westwing without undue delay of any potential personal data breach impacting such processing.

### 4.3. Communication

We expect our Business Partners to refrain from disrespectful, unprofessional, harassing, defamatory, discriminatory and prohibited activity on social media platforms or through other communication channels. Our Business Partners shall not act or speak on behalf of Westwing, represent themselves as Westwing, or express any views attributable to Westwing unless expressly authorised to do so by Westwing. Any environmental or social claims made in connection with Westwing must be accurate, verifiable and compliant with applicable consumer-protection rules, and supported by documentation that is readily available upon request.

## 05 Ensuring a safe and fair workplace

### 5.1. Human Rights

Our Business Partners must uphold the highest standards of human rights in accordance with internationally declared human rights and standards, and work against exploitation in the workplace. This means complying with all laws and regulations to abolish child labor, eliminate all forms of forced and compulsory labor, and prevent and ensure slavery and human trafficking are not taking place. This includes protecting the rights of migrant workers through responsible recruitment practices, such as prohibiting recruitment fees and ensuring freedom of movement. These expectations are consistent with Westwing's Human Rights Policy.

### 5.2. Equal opportunities/discrimination

We expect our Business Partners to treat people with respect and dignity and ensure that employees are not subject to any form of abusive conduct in the workplace. They should provide equal opportunity and treatment, employ people from a diverse talent pool based on qualifications, skills and experience, and not tolerate harassment, discrimination, retaliation, and bias on the basis of race, age, role, gender, gender identity, color, religion, country of origin, nationality, sexual orientation, marital status, dependents, disability, union affiliation, social class, ethnic origin or political views and/or any characteristic protected by law and support equal pay for work of equal value.

### 5.3. Freedom of association and right to collective bargaining

We expect our Business Partners to allow their employees to lawfully form and join trade unions of their own choosing without needing prior authorisation, and to bargain collectively in line with the relevant laws.

#### 5.4. Working hours, wages, benefits

Our Business Partners shall set working hours, wages, benefits, deductions, rest periods, leave and overtime in compliance with applicable laws and regulations in the country or countries in which they operate, taking into consideration industry benchmark standards.

#### 5.5. Health and safety

Our Business Partners shall provide a healthy and safe working environment in line with internationally declared human rights and make every reasonable effort to prevent accidents and work-related illnesses. This includes risk-appropriate preventive measures, safety protocols, corrective actions and training.

#### 5.6. Harassment-free workplace

We expect our Business Partners to provide a working environment free of abusive, violent, threatening, disruptive and other improper behaviour and not tolerate harassment, and other disrespectful conduct, including sexual harassment, discrimination, and bullying.

### 06 Final Provisions

Westwing reserves the right to regularly update this Policy. The currently valid version can be viewed at: <https://ir.westwing.com/websites/westwing/English/5500/compliance.html>. The Business Partner is obliged to regularly inform itself about the current version of this Policy.