

## **LUHTA HUMAN RIGHTS COMMITMENT AND STRATEGY**

This Human Rights Declaration and Strategy aims to describe Luhta's commitment to human rights and sustainability and the procedure for complying with human rights and environmental due diligence obligations.

This Human Rights Declaration and Strategy has been integrated to the everyday business operations at Luhta. All business processes and decisions are based on compliance with this Human Rights Declaration and Strategy and the related policies, such as Luhta's Code of Conduct, Environmental Policy, Modern Slavery and Human Trafficking Statement and in the Labour Rights Policy.

### **Commitment**

Part of Luhta's mission and values is to produce goods which lasts from one generation to another and therefore we are always seeking more sustainable ways to produce our products in order for our customers to make more sustainable choices. Human rights is an integral part of this sustainability approach Luhta has adopted as without respecting human rights, business nor its products are sustainable.

Luhta commits to several international instruments. The most important of them that guide our operations are:

- International Bill of Human Rights, which consists of UN Universal Declaration of Human Rights, the International Covenant on Economic Social and Cultural Rights and the International Covenant on Civil and Political Rights
- ILO Declaration of Fundamental Principles and Rights at Work
- UN Convention on the Rights of the Child
- UN Convention on the Elimination of All Forms of Discrimination Against Women
- OECD Guidelines for Multinational Enterprises
- UN Global Compact initiative
- UN Sustainable Development Goals
- Amfori Business Social Compliance Initiative's responsible procurement principles

### **Strategy**

Luhta has adopted the following steps to ensure adequate due diligence process regarding human rights and sustainability:

1. Through regular training and by updating internal policies, Luhta ensures that the staff, management and board of its mother company and subsidiaries all comply with responsible business conduct, which is described in Luhta's policies. Luhta also ensures that it is requiring responsible business conduct from its direct and indirect business partners by embedding responsible business principles into Luhta's Code of Conduct, which shall be signed by

each business partner. Human rights are in the centre of these abovementioned company documents.

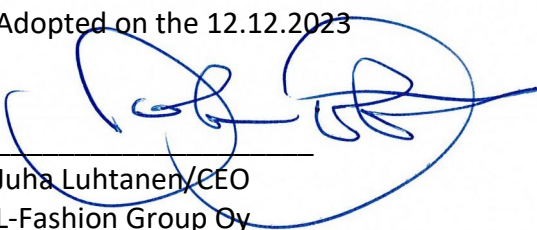
2. Luhta identifies the human right risks of its operations through human rights impact assessments. Based on these assessments we will focus our human rights due diligence efforts on those human rights issues on which our operations may have the most severe impact. Regarding our supply chain, we describe our risk management more in depth in Luhta's Supply Chain Risk Management System.
3. After recognising possible risks, it is possible to describe how Luhta cease, prevent and mitigate such risks to vulnerable individuals. Regarding to our supply chain, these are covered in the description of the Supply Chain Risk Management System.
4. In order to ensure the continuous compliance with Luhta's Code of Conduct, Luhta carries out regular third party audits and internal monitors through its North Star -process especially regarding its business partners. This process is described in-depth in the Supply Chain Risk Management System.
5. It is important to have transparent communication and reporting regarding human rights matters. Therefore Luhta provides a yearly Sustainability Report, which covers these matters.
6. Luhta has committed to provide support and cooperation to business partners case-by-case basis in order to achieve better compliance with the human rights requirements set out. This has been described more in depth in the Supply Chain Risk Management System.
7. Luhta's HR and sustainability teams provide regular training and learning to the staff of Luhta group in order to provide everyone the tools to recognise human rights issues in their everyday life.

This process shall be improved and reviewed regularly.

## Goals

Throughout 2022 and 2023 Luhta has trained its key personnel regarding human rights issues and upcoming regulations regarding sustainability and corporate responsibility. Luhta aims to extend this beforementioned comprehensive training to all relevant organisations in all daughter companies of Luhta. Moreover, Luhta will continue to enhance its cooperation with the UN Global Compact and external partners in order to improve its human rights due diligence processes. Furthermore, Luhta aims to improve its sustainability reporting for the year 2024 by focusing on the human rights issues for more transparent outlook.

Adopted on the 12.12.2023



\_\_\_\_\_  
Juha Luhtanen/CEO  
L-Fashion Group Oy