

1. Declaration on Human Rights and Fair Working Conditions

Background and scope

As a company that steps up to its responsibilities as a corporate citizen, the Conrad Group is committed to respecting internationally recognised human rights and preventing human rights violations.

That is why we actively promote fair working conditions in all areas under our control, and maintain respectful relationships with our internal and external stakeholders. We are referring primarily to employees when we talk about internal stakeholders, and to customers, suppliers and sellers when we talk about external stakeholders. We proactively engage with other stakeholder groups.

This Declaration on Human Rights and Fair Working Conditions underpins our duty of care as a corporate citizen towards our employees and business partners in particular and towards society in general.

The standards set out in this Declaration are based on our Code of Conduct for Employees and our Code of Conduct for Suppliers. They apply worldwide, even if they exceed local statutory requirements. In this instance, we expect them to be applied as a voluntary policy.

Responsibility beyond company walls

Our basic approach to safeguarding human rights and fair working conditions not only covers our own business activities but also our entire supply and value chain.

Responsible treatment of employees

Our own business activities are guided by our duty to neither cause nor contribute to human rights violations. We continuously encourage our employees to act in accordance with the principles set out below. We champion fair working conditions and mutual respect.

Responsible supply chain

In addition, we expect our suppliers to take appropriate measures to fully safeguard human rights and to protect the employee rights set out in this Declaration both within their own organisation and within those of associated subcontractors and suppliers.

Acceptance of our Code of Conduct for Suppliers, which forms part of our General Terms and Conditions of Business, is a mandatory requirement for any form of co-operation. We reserve the right to terminate a business relationship in the event of violations.

Commitment to internationally recognised norms, guidelines and standards

We are committed to the principles of responsible corporate governance in our business dealings. This also includes a firm commitment to and support for internationally recognised human rights. By signing up to the UN Global Compact, we acknowledge our corporate social responsibility and expressly declare our commitment to the ten principles it sets out in the areas of human rights, labour, environment and anti-corruption.

We are additionally guided by the following frameworks and standards:

- the Universal Declaration of Human Rights of the United Nations,
- the conventions of the International Labour Organization (ILO),
- the UN Guiding Principles on Business and Human Rights,
- the OECD Guidelines for Multinational Enterprises,
- the German National Action Plan for Business and Human Rights (NAP)
- the German Supply Chain Due Diligence Act (LkSG).



Organisation, roles and responsibilities

Every company in the Conrad Group is obliged to ensure compliance with this Declaration. Management of the respective Group company is responsible for implementing and ensuring compliance with the principles.

The Legal & Internal Audit/Compliance and Human Resources departments are responsible for global co-ordination of the measures aimed at safeguarding human rights and fair working conditions within the Conrad Group.

Responsibility for defining and monitoring the cross-department processes enabling due diligence within our supply chain lies with the Sourcing Governance central function.

The Corporate Social Responsibility department supports both of these functions in implementing and co-ordinating these activities.

Implementation

To avoid negative impacts on human rights as a result of our conduct, we provide regular training to our employees and make them aware of our corporate values and principles.

We take social and environmental criteria into account in our purchasing decisions and our regular supplier audits.

Both our internal and external stakeholders are completely free to report any compliance infringements anonymously via our whistleblower system.

Sustainable supply chain

Our Code of Conduct for Suppliers is an integral component of the Terms and Conditions of Purchase upheld by the Conrad Group.

Social and environmental factors are included in the criteria for selecting and evaluating suppliers.

We do not establish business relationships with suppliers who fail to comply with the defined minimum social and environmental criteria, and we reserve the right to terminate relationships with suppliers who fail to do so.

Reporting of violations

The so-called Whistleblower Directive (Directive (EU) 2019/1937) obliges companies that exceed a certain number of employees to set up an internal whistleblower system. Affected Conrad Group companies provide a whistleblower reporting system in multilingual form as part of their regulatory obligations to protect whistleblowers. The whistleblower office can be accessed via the following [link](#).

Our whistleblower system using legal expertise from Ratisbona Compliance GmbH („RC-Whistle“) creates additional trust and security by means of a clearly defined structure that is accessible to everyone, also anonymously, and a legally sound initial assessment in order to point out grievances and thus ensure the sustainable success of Conrad and avert damage.

All information will be investigated. No substantive statements will be made on the facts of the case. If necessary, appropriate measures will be taken and/or competent authorities will be involved. All documents will be kept confidential within the legal framework. Reprisals against whistleblowers of any kind will not be tolerated. The presumption of innocence applies to affected persons as long as they have not been convicted of a violation.

Further development

We see the exercise of due diligence in safeguarding human rights as a continuous improvement process. As such, we review the content of this Declaration on a regular basis and amend it in line with national and international developments if required.

Communication and transparency

We transparently report on the needs of our employees and our relationships with suppliers. The consideration of risks in connection with human rights violations is an integral element of our duty of care. In addition, we provide updates on our progress in safeguarding human rights and fair working conditions in our sustainability report and elsewhere.

2. Basic policies and principles

Child labour and young employees

Without exception, we reject all forms of child labour. Within the Conrad Group, we ensure compliance with the minimum age for regular employment as defined by the applicable national legislation.

Forced labour and human trafficking

We reject all forms of forced or compulsory labour and we are fully committed to the prohibition of human trafficking and slavery.

Discrimination and harassment

We reject all forms of discrimination. We have zero tolerance for discrimination based on ethnicity, cultural background, nationality, social status, religion, disability, gender, marital status, age, gender identity or sexual orientation at all of our production sites around the world.

Every employee has the right to be treated fairly and with politeness and respect. We do not tolerate harassment of any kind. The same goes for physical or psychological abuse.

Freedom of association and the right to engage in pay negotiations

All employees of the Conrad Group are free to join representative bodies permitted by law. We comply with the legislative provisions on collective bargaining.

Fair working conditions

We support fair working conditions and comply with all national regulations on working hours and paid leave entitlements. Our employees receive appropriate contractually agreed remuneration in line with the respective legally guaranteed minimum wage and the national labour market conditions.

Occupational health and safety

Protecting the health and safety of our employees is our top priority. We ensure that the physical health of our employees is safeguarded during their work activities and we provide them with a safe working environment. The same applies to external employees and contractors who are affected by our business activities. All sites of the Conrad Group comply with the applicable occupational safety laws and publish them onsite.



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