



Private Label Supplier Code of Conduct

December 2025

PUBLIC

Document Information	
Document type	Policy
Owner	Legal/Sustainability
Version	2.0
Status	FINAL VERSION

Scope of application of this document	
Scope	Westwing Group
Country	All
Company	All
Division/Department/Tribe	All
Location	All
Valid as of	December 2025

Change History			
Date	Version	Name	Reason for Change
June 2023	1.0		Policy Creation
December 2025	2.0		General Update

Content

1. Introduction	2
2. Employment practices and working conditions	4
2.1. Forced labor	4
2.2. Child labor	4
2.3. Discrimination	4
2.4. Disciplinary measures	5
2.5. Migrant workers	5
2.6. Recruitment	5
2.7. Working hours.....	6
2.8. Freedom of Association and Right to Collective Negotiations	6
2.9. Health and safety	6
3. Environmental standards	6
4. Business ethics and management	8
4.1. Corruption and bribery	8
4.2. Gifts, hospitality and entertainment.....	8
4.3. Conflicts of interest	8
4.4. Political contributions, donations and sponsorships	9
5. Disclosure of information and privacy.....	9
6. Communication	9
7. Fair business and competition.....	9
8. Intellectual property	10
9. Whistleblower protection.....	10
10. Governance and responsible purchasing practices	10

1. Introduction

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

Westwing is committed to respecting internationally recognised human rights and to ensure that it is not in any way complicit in human rights violations. Suppliers 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, Suppliers shall comply with the provisions of this Policy. The principles of this Policy are based on the Conventions of the International Labor Organisation (ILO), the United Nations Global Compact, the UN Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. This Policy also draws on the UN Convention on the Rights of the Child (CRC), the Convention on the Elimination of All Forms of Discrimination against Women (CEDAW), the International Covenant on Civil and Political Rights (ICCPR), and the Paris Agreement and Science Based Targets initiative (SBTi).

We expect our Suppliers to align their operations and activities with the principles of this Policy. In addition, Suppliers are responsible for ensuring that these principles are effectively communicated, understood, and implemented within their own organisations. This includes disseminating the Policy to employees, educating relevant personnel, and extending these requirements to their suppliers and contractors to guarantee that the standards are applied consistently throughout the supply chain. We encourage our Suppliers to periodically assess their suppliers for conformance. For high-risk categories, Suppliers shall disclose key Tier-2 sources to Westwing upon request. Our Suppliers are expected to engage only with suppliers and contractors who demonstrate commitment to meeting required standards as applicable laws.

Our Suppliers shall maintain or introduce structures, rules, environmental and social management systems, preferably based on international standards (e.g., ISO 14000, ISO 26000, SA 8000) that ensure compliance with the following principles. This also requires the implementation of a control system with internal audits at least once per year and a minimum level of documentation for at least 24 months, which is provided to Westwing upon request.

The Supplier permits unannounced desk-based audits and/or audits in the supplier premises (including off-site worker interviews), which may be conducted by Westwing, its employees, its subsidiary agents, or a third-party organisation appointed by Westwing. High-risk and strategic

suppliers may be audited at least annually; medium-risk suppliers may follow a multi-year cycle. The categorisation of suppliers is at Westwing's discretion.

Westwing will attempt to work with the Suppliers in case of non-conformance to this Policy and expects the Suppliers to develop a corrective action plan to bring its operations into conformance within a reasonable timeframe to be agreed upon in collaboration with Westwing. Corrective action plans must include root-cause analysis, time-bound milestones, and follow-up verification. Where adverse impacts are identified, Suppliers shall provide for or cooperate in legitimate remediation processes consistent with the UN Guiding Principles on Business and Human Rights (UNGPs). Westwing reserves the right to take appropriate actions up to termination of business relations with a Supplier in cases of violations of human rights and of environment-related matters, intentional violations of laws and minimum standards or of the rules set out in this Policy.

The successful implementation of this Policy depends on cooperation, trust, and respect between the Suppliers and Westwing. In this context, Westwing will provide trainings to its Suppliers and purchasing department, as required, to facilitate the correct implementation of this Policy. Suppliers shall maintain participation in Westwing's training and capacity-building on human rights, sustainability and compliance, and collaborate on systemic issues where relevant. All observations, discussions and written information received from the Suppliers are to be treated confidentially by Westwing, its employees and any third-party organisation appointed by Westwing.

Where national statutory regulations impose more stringent requirements than this Policy, those regulations shall take precedence and must be respected by Suppliers. Should any of Westwing's requirements contradict national laws or regulations, the law shall prevail. In such cases Suppliers must immediately inform Westwing.

Compliance with applicable laws, relevant industry minimum standards, and the Conventions of the International Labor Organization (ILO), form the basis of our sustainability-oriented business. We expect our Suppliers to accept this principle and treat the conditions and requirements laid down in this Policy as minimum standards. We recognise that local standards in some countries where our Suppliers operate may fall short of those set out in this Policy. In such cases, Suppliers are expected to apply the standards outlined in this Policy.

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 actions when a breach or violation of the laws or this Policy becomes known up to and including termination of the cooperation.

2. Employment practices and working conditions

2.1. Forced labor

Employment shall be freely chosen. All employment must be voluntary and workers must be free to leave in accordance with the respective legal requirements, respectively after reasonable notice. Our Suppliers therefore must not use forced labor,– including prison labor, slavery, debt bondage or other forms of work that violate basic human rights. No employee may be made to work by force, threat of force or intimidation. This also applies to work obligations that are sanctions for the political views or opinions of the employee. Further, personal documents or other belongings are not to be withheld and there should be no excessive notice periods or substantial fines for terminating the employment. Employees have the freedom to leave the premises when their work shifts end. These requirements align with applicable modern-slavery legislation (e.g., the UK Modern Slavery Act 2015).

2.2. Child labor

Our Suppliers must not employ children in the compulsory school age of the respective country; and in any case, they must comply with the applicable national legislation regarding the minimum working age. The minimum working age can vary in countries especially where educational facilities are less well developed. Any exploitation of children and adolescents is illegal, and it is to be ensured that working conditions are provided which eliminate any danger, threat or other uncertainty for children and adolescents. Young workers (under 18) shall not perform hazardous work. The Supplier must have a proof of age documentation for all workers. If child labor is identified either at the Supplier or at any sub-supplier, Westwing must be informed immediately and reserves the right to take appropriate actions up to termination of business relations with a Supplier. A child-labor remediation plan prioritising the child's safety, education and welfare shall be implemented in cooperation with Westwing and/or competent organisations.

2.3. Discrimination

All employees must be treated equally and without discrimination. Decisions about hiring, remuneration, termination, promotion, benefits, training opportunities, work orders or disciplinary action should depend only on the professional qualifications and the quality of the work performance of the employees. The above said decision shall not depend on or be based on certain personal characteristics or beliefs, race, ethnicity, descent, gender, gender identity, nationality, social background, religion, age, disability, marital status, sexual orientation, political opinion or membership in an organisation. Every employee shall be treated with dignity and respect. Harassment or abuse—physical, sexual, psychological or verbal—is prohibited.

2.4. Disciplinary measures

Disciplinary rules shall be lawful, proportionate and transparent. Corporal punishment, mental or physical coercion, and monetary fines or unlawful wage deductions are prohibited. Any disciplinary action must be documented; workers shall be informed in writing of the reason, have an opportunity to respond, and have access to appropriate appeal process.

2.5. Migrant workers

Migrant workers shall have exactly the same entitlements as local employees. Suppliers shall follow the employer-pays principle for recruitment-related including commissions and any other fees and must not retain personal documents without legal justification. The withholding of wages or deposits is not allowed. Workers employed through an agent or contractors are the responsibility of the Supplier and are thus covered by this Policy. Effective measures are to be taken against the exploitation of migrant workers to protect them from all forms of discrimination and to offer them an appropriate support adequate to their special status, including providing them with a written employment contract in a language they understand.

2.6. Recruitment

Before employment commences, each worker shall receive a written and signed employment contract, in a language the worker understands, stating at least position, wages and the wage-calculation method, working hours, overtime terms, benefits, and notice period. Workers shall be allowed legally mandated holiday, paid annual leave and time off when ill or for maternity leave. To every extent possible, work performed should be based on a recognised stable employment relationship.

For the work accomplished within the normal working hours, employees must receive remuneration that meets, at a minimum, national legal standards and complies with industry benchmark standards. Overtime shall be managed and compensated in accordance with applicable law or collective agreements. In addition, a statutory form of social security must be ensured. In countries without a statutory minimum wage, Suppliers shall pay a living wage that meets basic needs, supports dependents, and allows employees to build a minimum level of private assets. Suppliers shall pay fair remuneration that ensures a decent standard of living, guarantees timely and complete payment, and prohibits unlawful deductions. Where underpayment is identified, Suppliers shall provide back-pay remediation. Beyond legal minimal, Suppliers are expected to pursue continuous improvement in workers' living standards (like progressive wage increases, enhanced social benefits, welfare programmes, and services), in line with international fair wage principles.

The Supplier must ensure equal remuneration for men and women workers for work of equal value.

2.7. Working hours

The locally effective legal requirements, industry and internal labor standards concerning work and rest periods are to be complied with by all Suppliers; regular breaks must be ensured. The standard weekly working hours shall be defined by contract and should not exceed 48 hours per week; overtime shall be voluntary and should not exceed 12 hours per week except in exceptional circumstances. Overtime shall not be used to replace regular employment. The total hours worked in any 7-day period shall not exceed 60 hours. After six consecutive working days each employee must receive at least one day off. A transparent and reliable system for records of working hours and wages for all workers must be maintained by our Suppliers.

2.8. Freedom of Association and Right to Collective Negotiations

All Suppliers shall accept that their employees have the right at their own will to join, to found or to participate in associations (especially labor organizations such as trade unions) and to participate or organize collective bargaining without fear of reprisal, interference, intimidation, or harassment in line with internationally recognised standards. Westwing will strive to collaborate, as necessary with third parties to promote the rights to freedom of association and collective bargaining.

2.9. Health and safety

Our Suppliers are responsible for ensuring a safe, hygienic and non-health-endangering work environment. This includes, in particular, fire protection, building safety, protection from toxic substances and accidents, as well as access to clean drinking water and sanitary facilities. Appropriate precautions against accidents at the workplace and occupational illnesses are to be taken (e.g., through protective clothing and equipment); Suppliers will therefore establish and communicate safety regulations, work processes, training and technical inspections. Site emergency plans are developed and implemented, e.g., for fire, natural disasters and (chemical) accidents. First-aid equipment must be adequately stocked and available, and an adequate number of persons must be first-aid trained and present during working hours. A log of incidents and corrective action plans shall be maintained. These requirements also apply to social facilities and accommodation for employees if they are provided by the employer. Suppliers shall operate a health and safety management approach appropriate to their risk profile and maintain evidence of training, incident logging and corrective-action follow-up.

3. Environmental standards

Responsible and prudent use of natural resources is a prerequisite for us and for a sustainable business operation. We therefore expect our Suppliers to define standards and implement procedures that enable a responsible use of resources. All procedures should focus on the precautionary principle. We expect our Suppliers to introduce a management system to define,

control and mitigate their adverse environmental impacts. Preferably this system should be based on an international standard, ISO 14001 or similar, and be third-party certified. Our Suppliers must set ambitious targets for reducing their environmental impact and aim for continuous improvement in their environmental performance going beyond compliance.

Suppliers shall comply with Westwing's Raw Material Sourcing Policy, including all certification and traceability requirements. For animal-derived materials, Suppliers must uphold the Five Freedoms of animal welfare and prohibit cruel practices such as live-plucking or mulesing. In line with the Raw Material Sourcing Policy, Suppliers are also expected to commit to halting deforestation and degradation and to support biodiversity protection, particularly with respect to land preservation and ecosystem integrity, in accordance with applicable laws and relevant international standards. Where required by law or by Westwing's policies, Suppliers are obliged to share with Westwing the documents and information to ensure traceability for this compliance.

Suppliers shall further comply with Westwing's Packaging & Labelling Guidelines (e.g., right-sizing, product protection, use of recyclable or recycled materials, and avoidance of unnecessary single-use plastics) and with all applicable packaging and packaging-waste laws, including extended producer responsibility obligations. Where required by law or by Westwing's policies, Suppliers shall provide appropriate traceability information for in-scope raw materials and products upon request.

Our Suppliers are expected to minimise waste, reduce emissions to air, and prevent discharges or pollution to land and water. They must characterise and treat wastewater on site or use an external wastewater treatment facility. Emissions to outdoor air must be monitored and treated according to applicable permits and emission limits. Ground contamination must be prevented, and any contamination must be immediately acted upon. Hazardous waste must be handled, stored, and disposed of in an environmentally safe manner. Suppliers must manage chemicals safely, ensure compliance with applicable chemicals legislation (e.g., REACH, CLP, POPs), and adhere to Westwing's Restricted Substances List (RSL). Safety Data Sheets shall be available on site. Suppliers must also contribute to the recycling and reuse of materials and products, reduce energy consumption, and strive for more efficient use of resources.

Suppliers shall cooperate on circular design (e.g., durability, repairability), reduce single-use plastics where feasible, and provide traceability for priority raw materials upon request. Suppliers should measure and annually report their energy consumption and greenhouse gas (GHG) emissions (Scopes 1 and 2, as well as Scope 3 where material), set time-bound reduction targets in line with recognised methodologies (e.g., SBTi), and prepare climate-risk adaptation plans. Our Suppliers shall have programs and systems in place to provide workers with safety information relating to hazardous materials and education to protect them from potential hazards. Contingency plans for preventing, mitigating, and controlling serious environmental and health damage from

their operations must be in place, including accidents and emergencies, as well as mechanisms for immediate reporting to the competent authorities. Hazardous materials can include but are not limited to raw materials, isolated intermediates, products, solvents, cleaning agents and waste. Special attention is to be paid to local laws and regulations, industry standards or other requirements in the same amount as to international regulations and standards. Necessary permits, licenses and test reports must be obtained and kept up to date. This includes but is not limited to emissions to air, noise, water discharge, ground contamination and animal protection. Our Suppliers are to adhere to applicable laws and regulations regarding prohibition or restriction of specific substances in products and manufacturing.

4. Business ethics and management

4.1. Corruption and bribery

Fairness, integrity, and compliance with minimum moral standards are essential for a functioning business relationship. Westwing does not tolerate any form of corruption, whether it is bribery or accepting or granting advantages or benefits. The same applies to other forms of influence such as fraud, extortion, embezzlement, or similar measures. Our Suppliers should not, directly, or indirectly, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantage. Nor should enterprises be solicited or expected to render a bribe or other undue advantage. Therefore, appropriate internal regulations and management control systems are to be implemented and communicated to uncover relevant influences and to prevent them. In addition, we ask all Suppliers to immediately notify us if there is a suspicion of, or any actual case of, corruption. Suppliers shall comply with applicable anti-bribery laws and maintain accurate books and records.

4.2. Gifts, hospitality and entertainment

Our Suppliers must not give gifts or entertainment to Westwing employees or representatives that create a conflicts of interest or the appearance of a conflict. Modest gifts and hospitality may be permissible so long as they are not provided as a quid pro quo, are modest in value, infrequent, unsolicited, given on a customary gift-giving occasion, reasonable and customary in our business and permissible under the Westwing Anti-Corruption Policy, the policies of Westwing Suppliers' organisation and comply with applicable laws.

4.3. Conflicts of interest

Suppliers shall also avoid situations where personal, financial, or other interests may conflict, or appear to conflict, with their responsibilities towards Westwing. Should a situation arise, Suppliers inform Westwing without delay and disclose any potential or actual conflicts of interest to ensure transparency, and to take appropriate measures.

4.4. Political contributions, donations and sponsorships

Our Suppliers shall avoid any political contributions, charitable donations, or sponsorships that would aim at or give the appearance of aiming at gaining an unfair competitive advantage or exercising improper influence. Any public-policy engagement related to Westwing requires written authorisation and full transparency. Suppliers must not represent Westwing in political matters without approval.

5. Disclosure of information and privacy

Our Suppliers shall disclose information regarding labor, health and safety, environmental practices, business activities, structure, financial situation, and performance as required by law and Westwing policies, and shall cooperate with Westwing to meet applicable supply-chain, product-safety and product-data laws and standards (including, where relevant, EU requirements). They shall not provide false or misrepresented records or reports of conditions or practices in their supply chain. Furthermore, our Suppliers shall protect the privacy expectations of personal information of everyone they do business with, including suppliers, customers, consumers, and employees. They are to comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted, and shared. Upon request, Suppliers shall provide accurate ESG information (e.g., audits and corrective actions, wages and working-hours data, worker grievances, energy/GHG, water, waste, incidents, chemicals) and origin, composition and traceability documentation and packaging specifications and labelling information (e.g., materials and weights, recycled content, recyclability claims substantiation, relevant certifications/registrations) needed to demonstrate conformance with Westwing's policies (including the Raw Material Sourcing Policy, and Packaging and Labelling Guidelines) and to support Westwing's due diligence, compliance and sustainability reporting.

6. Communication

There must be a process for communicating clear and accurate information about our Supplier's policies, practices, expectations, and performance to workers.

7. Fair business and competition

Standards of fair business and competition are to be upheld and applicable laws to protect free and fair competition must be complied with. Our Suppliers must refrain from entering into or carrying out anti-competitive agreements among competitors.

8. Intellectual property

Our Suppliers shall respect intellectual property rights and ensure technology and know-how is transferred in a manner that protects intellectual property rights in the extent agreed in the contract..

9. Whistleblower protection

Westwing's Suppliers who believe that a Westwing employee, or anyone acting on behalf of Westwing, is acting unethically, improperly or illegally should report their concerns swiftly via our [whistleblower channel](#). Suppliers shall implement and maintain accessible, confidential and non-retaliatory worker grievance mechanisms for workplace concerns (e.g., terms, conditions, conduct), communicate them transparently in a language workers understand, investigate concerns promptly, and take action to prevent, detect and correct retaliation. Suppliers shall ensure constructive and respectful worker–management dialogue to discuss complaints and develop solutions, track and close cases with corrective actions, provide feedback to complainants, and make the procedures known to all workers provided that the outcome of the case is relevant to all workers (e.g., onboarding, posted notices). Whistleblowing channels shall be available for serious misconduct or where normal channels are ineffective. Retaliation against any person raising a concern in good faith is prohibited.

10. Governance and responsible purchasing practices

Westwing integrates supplier compliance with this Code of Conduct and ESG performance into onboarding, allocation and renewal decisions. Non-compliance may lead to termination and/or de-selection, while strong performance may result in preferred status. Westwing will adapt purchasing practices (e.g., lead times, forecasting) where feasible to support compliance with this Policy.

Westwing reserves the right to update this Policy. The currently valid version is available at: <https://ir.westwing.com/websites/westwing/English/5500/compliance.html>. Suppliers are obliged to keep themselves informed of the valid version at all times.