



WESTWING

# Business Partner Code of Conduct

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# 01

## Introduction

Westwing is the European leader in inspiration-based Home & Living eCommerce. We genuinely care about our customers, our colleagues, and our Business Partners. Our respect for the individuals and their rights is key to our overall approach and we are committed to maintaining the highest standards of legal, ethical, social and environmental conduct, in accordance with all applicable laws and regulations throughout our business practices and relationships.

We expect our Business Partners to do the same in accordance with the principles set out in our Westwing Code of Conduct (the “Westwing Code”), available upon request or accessible through our website.

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

A “Business Partner” is any company, organization, entity or person that sells or seeks to sell any kind of product or service to Westwing or any individual or organization 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.

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.

## 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 quality and ingredients, environmental standards, occupational health and safety, privacy and data protection, labor and employment, 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.

## Compliance with this Code

The Westwing Partner Code is not intended to replace the existing policies of our Business Partners or those of their subsidiary businesses, but to act as an additional set of 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 and any of their Business Partners who are involved in work for Westwing, meet the following requirements and, if requested, are able to provide us with necessary information to demonstrate compliance.

Westwing reserves the right to regularly update the Partner Code. 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 the Partner Code.

Westwing has the right to investigate any reasonably suspected breach of the Partner Code 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.

## Reporting violations

Our Business Partners should report, and act to correct, any suspected violations of regulations, laws or the Partner Code within a reasonable time frame. Violations must be reported in a timely manner to [compliance@westwing.de](mailto:compliance@westwing.de).

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

# 02

## Conducting business in an ethical manner

### 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.

### Corruption and bribery

We expect that our Business Partners do not engage in corruption, bribery or any activity (including improper payments or the giving or receiving of preferential treatment) that may imply involvement in corruption or bribery 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.

### 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.

### Insider trading/dealing

Our Business Partners must not engage in insider trading or dealing. Inside information is information about an entity that is not public. 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.

## 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.

## Environment

Our Business Partners should strive to identify and manage the environmental impacts of their organization, products and services. We expect our Business Partners to undertake efforts to reduce their greenhouse gas emissions and to engage in initiatives to promote environmental responsibility, effective waste management and efficient use of natural resources.

# 03

## Operating with integrity

### 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).

### 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.

## Financial reporting

We expect our Business Partners to keep accurate records using recognized 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

### 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 authorized by Westwing nor other parties' unlicensed software or technology in support of or in connection with work for or with Westwing.

### 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 authorized and directed by



Westwing and as required by applicable laws and regulations. Our Business Partners shall protect personal data and confidential information against unauthorized and unlawful use, disclosure, access, loss, alteration, damage and destruction.

## 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 authorized to do so by Westwing.

# 05

## Ensuring a safe and fair workplace

### 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 ensure slavery and human trafficking are not taking place. We expect our Business Partners to periodically assess their partners for conformance and to work with partners who are also committed to meeting required standards at least as mandated by local and national laws.

## 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.

## 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 authorization, and to bargain collectively in line with the relevant laws.

## 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.

## 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.

## Harassment-free workplace

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



WESTWING