

Commitment to respect human rights

May 2023

Respecting human rights is a fundamental value for companies that operate with integrity. Raw materials, semi-finished and finished goods are traded on globalised markets. This also poses a risk for Leifheit in the case where suppliers fail to comply with the principles of sustainable company management. Our declared aim is to ensure the acceptance and implementation of high social and environmental standards in our supply chain.

Germany's Supply Chain Due Diligence Act (Lieferkettensorgfaltspflichtengesetz, LkSG), a law regarding the corporate due diligence duties for avoiding human rights violations in supply chains, defines specific due diligence duties for companies to respect human rights. Although Leifheit AG does not fall within the scope of the Germany's Supply Chain Due Diligence Act (LkSG) we also comply with the required due diligence duties.

This declaration of intent describes the essential steps and measures that we take as part of our business activities, in order to identify and avoid potential risks concerning human rights and the environment within the context of our business activities. It implements the requirements of the LkSG. We are committed to the international principles regarding the protection of human rights and the environment, which are reflected in section 2 (2) and (3) of the LkSG. This includes, inter alia, to the understanding of Leifheit, paying fair wages, ensuring appropriate working conditions on site and preventing the exploitation of children. For Leifheit, equality among women and men is a given. We do not tolerate any discrimination and are committed to equal opportunities irrespective of age, disability, gender, religion, ethnic origin and sexual orientation. We are also opposed to corruption such as forced labour and human trafficking: Leifheit is responsible for these guidelines and trains employees to apply these values in the company. This begins with the awareness of violating these principles, which are addressed and dealt with via fixed processes leading to suitable measures for the company. This also applies to information from third parties. We accept this responsibility as a company, independent of the ability and willingness of states, to comply with their obligation to protect human rights.

Management approach

We take different measures to ensure the protection of human rights in the supply chain. This includes the establishing of a complaints procedure and a human rights risk management system, in order to be able to identify and analyse human rights violations in the supply chain in good time. The aim of our supplier risk management system is to provide the basis for complying with the implementation of the protection targets of the law. On this basis, measures can be taken to ensure the respect of human rights within the supply chain.

Our supplier risk analysis is based on several fundamental pillars, for example: the general risks consisting of categories specific to countries and product groups, the supplier-specific risks, which comprise internal indicators, audit results and self-disclosure. In the course of risk analysis, possible preventive or remedial measures that may become necessary are expressed and initiated by the persons responsible for the issues. We expect our business partners to be committed to respecting human rights and protecting the environment to the same extent, and to set up appropriate due diligence processes, in order to identify and avoid human rights and environmental risks. The central element is our Social Code of Conduct, in which we have defined

our supplier requirements. Its principles are consistent with the Business Social Compliance Initiative (BSCI), the Conventions of the International Labour Organization (ILO), the Universal Declaration of Human Rights of the United Nations, the UN Conventions on the Rights of the Child and the Elimination of all Forms of Discrimination against Women, the principles of the UN Global Compact and the OECD Guidelines for Multinational Enterprises.

Reporting and Outlook

We have no reporting commitment to the Federal Office of Economic and Export Control (BAFA) due to the size of our company, however we regularly report on corporate due diligence duties in the supply chain as part of our sustainability reporting. We are committed to the continuing development of our due diligence process regarding human rights and the environment. For this purpose, we will regularly review and optimise the implementation of these principles within the scope of our work.