

Marc O'Polo

EST. IN STOCKHOLM

MARC O'POLO POLICY STATEMENT ON RESPONSIBLE LOBBYING

Version 1.0

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1. PURPOSE & SCOPE

Responsible business conduct is an essential part of Marc O’Polo’s corporate culture. Our corporate values form the basis of our actions – including in our interactions with political decision-makers, public authorities and industry associations.

As a family-owned company, we consider it part of our responsibility to reconcile economic interests with social and environmental concerns. Marc O’Polo does not conduct its own political lobbying activities. Where we engage in dialogue through industry associations, initiatives or expert groups, we do so responsibly, transparently and in line with our corporate values.

This policy statement provides transparency on our approach to responsible lobbying. It sets out the principles according to which Marc O’Polo conducts its lobbying activities and how we ensure that these are carried out in line with our corporate values, our sustainability strategy and the principles of good corporate governance.

This policy statement applies to all Marc O’Polo companies in Germany and abroad.

2. EVIDENCE-BASED APPROACH

Whenever Marc O’Polo takes a position on issues relevant to the industry or society, or contributes to the work of industry association committees, we rely on comprehensible, fact-based information – such as recognised industry studies, scientific findings or data from recognised expert organisations. Our positions are based on comprehensible and reliable information and take our corporate values and sustainability strategy into account. Our aim is to engage in constructive dialogue that considers different perspectives and contributes to viable solutions.

3. POLITICAL CONTRIBUTIONS AND INTEGRITY

Marc O’Polo does not make financial or in-kind contributions to political parties, candidates, election campaigns or party-affiliated organisations. This also includes indirect in-kind contributions, such as the provision of services, equipment or premises. Corruption, bribery, conflicts of interest or any form of improper influence are not tolerated.

4. PARTICIPATION IN INDUSTRY ASSOCIATIONS AND EXPERT GROUPS

Marc O’Polo is a member of selected industry associations and initiatives in order to promote professional exchange, monitor developments in the industry and work with other stakeholders on forward-looking solutions. We ensure that our memberships and participation in industry associations and initiatives are consistent with our corporate values, our sustainability strategy and the principles of this policy statement.

Within this framework, we also participate in working groups or expert bodies in some cases. Marc O’Polo does not take an active leadership role (e.g. on the management board or executive committee) in these associations and generally does not sign political position papers.

New memberships in industry associations or initiatives are reviewed in advance by Compliance and require approval by the Executive Board.

The same applies to any potential involvement in political position papers. If such involvement entails taking a public position or communicating on political issues, Corporate Communications is involved at an early stage. External political communication takes place only after prior coordination and approval by the Executive Board.

In addition, we regularly review whether the public positions of the associations of which we are members are compatible with our corporate values and sustainability strategy. If an association's positions or activities conflict with our principles, we first seek constructive dialogue with the aim of contributing to a joint solution. If these differences remain unresolved and no appropriate solution can be found, we consider taking further appropriate action, including ending our participation.

5. GOVERNANCE, CONTROL AND ACCOUNTABILITY

The Executive Board has overall responsibility for implementing this policy statement, while the managers of the relevant departments ensure its operational implementation. They ensure that all lobbying activities are conducted in line with Marc O'Polo's corporate values and stakeholder responsibility. Managers must ensure that every new association membership is reviewed by Compliance and approved by the Executive Board, and that any involvement in political position papers is reviewed by Corporate Communications and approved by the Executive Board. Both processes are recorded in the central register.

The full Executive Board formally reviews and approves this policy at least once a year.

6. TRANSPARENCY & GRIEVANCE PROCEDURE

We provide transparency on our lobbying activities. To this end, we publish annual information on relevant association and committee memberships as well as on political contributions made or not made. A detailed overview is provided in our annual report on lobbying and political contributions [\[2\]](#).

Employees, business partners, customers and other stakeholders can report concerns relating to our lobbying activities or our participation in industry associations and initiatives at any time via Marc O'Polo's existing Hintbox whistleblowing system. Reports can be submitted in good faith without fear of disadvantage.

This policy statement is publicly available on Marc O'Polo's website.

DOCUMENT INFORMATION

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This English version is a translation of the German original. In the event of any discrepancies or ambiguities, the German version shall prevail.



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