Human Rights Declaration

Our commitment to human rights

The Otto Group can look back on a long tradition as a responsible company. For more than 25 years now, we have been linking our economic goals with our responsibility for people and nature. The recognition and respect of human rights has always been of central importance for us. This human rights declaration expresses our traditional values as well as our future responsibility.

The Otto Group is committed to respecting all internationally recognised human rights. Our approach to the implementation and management of human rights issues is based on the United Nations Guiding Principles for Business and Human Rights (UNGPs). Content wise, our approach is based in particular on the following international standards and frameworks:

- United Nations Universal Declaration of Human Rights (UN-UDHR)
- Conventions and recommendations of the International Labour Organisation (ILO) on labour and social standards
- United Nations Convention on the Rights of the Child (UN-CNC)
- United Nations Convention on the Rights of Women (UN-CEDAW)
- Guidelines for Multinational Enterprises of the Organisation for Economic Cooperation and Development (OECD)

We define concrete requirements for ourselves and our partners

In order to live up to our standard regarding the recognition and respect for human rights in the Otto Group, we have implemented guidelines throughout the Group which express our attitude towards ourselves and our business partners. These guidelines form the basis of our daily actions, taking into account not only our own employees and suppliers, but also the employees in our supply chains, our service providers and our customers. At Group level, there are four guidelines in particular:

- With our Group Guideline Sustainability in Procurement and the additional Group Manual Sustainability in the Purchase of Merchandise (includes sustainability (exclusion) criteria for the procurement of commercial and non-commercial goods and services in the Otto Group), we internally set the basis for the implementation of our ambition. These guidelines form an essential basis for cooperation with business partners. Therefore, the detailed requirements set out in these guidelines with regard to social and environmental aspects are not only important with regard to existing business partners but are also decisive in the selection of new business partners.
- Our requirements for our business partners in the area of procurement of commercial goods are specified in the Business Partner Declaration. A part of these binding requirements is the amfori BSCI Code of Conduct with its corresponding implementation conditions, which includes among others social standards, rules on environmental protection and occupational health and safety. Within the framework of accepted standards, social audits in particular are carried out as regular and

independent control measures that represent an important element for risk analysis and any subsequent measures.

- In addition, we have defined and implemented a Code of Conduct for services and non-commercial goods, which also includes social standards, rules on environmental protection and occupational safety.
- Finally, the Code of Ethics was developed in a participative process by all Otto Group employees and serves as a compass of values, providing guidance for responsible thinking and action in everyday work.

We set priorities where we see human rights risks

We know that human rights due diligence is an ongoing process. For this reason, we conduct repeated analysis of our own business activities and our business relationships to identify potential risks and actual violations. We identify where the greatest human rights risks are and prioritise them. This enables us to derive appropriate measures to eliminate or reduce these risks. As a globally operating retail and service group, our human rights diligence focuses on our own employees and the people in the supply chains of our commercial products.

Through our risk analysis, we identify our *salient issues*, i.e. those human rights issues that have the most severe impact on the people potentially affected by the company's activities (e.g. employees within the company, in the supply chain, local residents, customers, etc.). To identify these issues, we build, among other things, on our findings from dialogues with people potentially affected by human rights violations. We are currently conducting these dialogues mainly in the context of multi-stakeholder initiatives and would like to expand them in the future.

We have currently identified as *salient issues* the work-related topics of child and forced labour, working hours, remuneration, discrimination, occupational safety and freedom of association, as well as the general issue of data protection and privacy. These are also reflected in our CR strategy. We derive measures for the identified areas in order to improve the status quo and to prevent situations that could give rise to human rights concerns. Depending on the topic, measures can be taken at Group level, in a network of several Group companies or at individual Group company level.

The Otto Group believes that the transfer of knowledge regarding the improvement of working conditions in supply chains is a central and sustainable key to avoiding human rights risks. This is why we are committed to training and further education measures in our supply chain. In addition, we use the cooperation in initiatives to join forces with stakeholders from business, politics and civil society. We evaluate the effectiveness of our established measures in order to continuously improve them.

Despite our careful approach with regard to human rights, we are aware that violations may occur. We therefore consider the establishment of complaint mechanisms to be essential. On the one hand as an indicator to identify risks and on the other hand to detect actual violations where they occur and to initiate countermeasures.

We are already working on finding an industry solution that will allow greater access to complaints procedures within the framework of our membership of the *amfori* and the *International Accord* as well as throughout our engagement in the *Dialogue and Impact for Sustainable Textiles*. In addition, our whistleblower system gives all people connected to the Otto Group - whether employees, business partners, suppliers or customers - the opportunity to report compliance violations.

The digital SpeakUp whistleblower portal is available to all employees, business partners, suppliers and customers for reporting substantiated suspicions of compliance violations. The portal is a protected and secure reporting channel, can be used anonymously and guarantees the highest level of protection for whistleblowers and sensitive data. The tool offers the opportunity to communicate anonymously with whistleblowers around the clock. It can be used worldwide in 20 languages.

In addition, anyone can contact the Otto Group's ombudsman, lawyer Dr. Rainer Buchert (Tel: 0049-69-710 33 33 0, e-mail: dr-buchert@dr-buchert.de), in the event of suspicion. The lawyer's duty of confidentiality, the lawyer's right to refuse to give evidence and supplementary contractual provisions ensure that the identity of whistleblowers is protected. Reports are only forwarded to the responsible compliance units within the Otto Group with the consent of the whistleblower.

Both the digital whistleblower portal SpeakUp and the ombudsman Dr. Rainer Buchert serve as internal reporting points in accordance with the Whistleblower Protection Act and complaints offices in accordance with the Supply Chain Due Diligence Act (LkSG). The rules of procedure for the complaints procedure and whistleblower protection for Otto (GmbH & Co. KGaA) can be found here.

We report on our progress

We report annually in the Otto Group Annual Report on our human rights due diligence process at Group level. Further information on business model specific focal points, risks or measures are published by the concerned individual Group companies.

The world and our market environment are constantly changing. We therefore continuously review our risk assessment and measures. We also subject our processes, this human rights declaration and our communications to regular review and adapt them to changing circumstances as necessary. In this sense, we are, for example, constantly working to make our reporting on risks and measures even more transparent.

The Otto Group Executive Board is responsible for the implementation of and compliance with this declaration. In particular, the Group-wide CR Board, under the leadership of Chairwoman Petra Scharner-Wolff, will remain responsible for all Group's strategic sustainability activities. The CR Board is supported in this by the holding's Corporate Responsibility department, which works in close cooperation with the Group companies and other relevant stakeholders.



Petra Scharner-Wolff

Chairwoman

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