

CSR CODE OF CONDUCT

Introduction

Wehkamp Retail Groups ("WRG") purpose is "Together we bring joy into every home". An important condition for achieving this purpose is that WRG respects the environment and the well-being of people that work in its supply chain by minimizing negative social and environmental impact and maximizing the positive ones.

With this Code of Conduct we express our goals on important CSR topics. Achieving these CSR goals is only possible if our suppliers and other business partners support them and work with their suppliers to identify risks with a negative social or environmental impact and take corrective actions where needed.

Our business partners.

This Code of Conduct is applicable to all contracts with our suppliers, agents and other business partners. We expect them to comply with relevant national and international laws and other provisions at all times.

Our ethical business behaviour

We do not tolerate any acts of corruption, extortion, embezzlement, or bribery.

Our buying responsibility

We want to make sure that our buying practices don't put pressure on the production facilities that can result in social circumstances at any level in the supply chain that are below our or international standards. Suppliers and other business partners can inform us via csr@wehkamp.nl at any time if they feel this is the case and we will take corrective actions.

Our requirements on important CSR topics

Discrimination and gender

positions.

We continuously work to eradicate discrimination from the production and supply chain and to achieve equal rights, opportunities and wages for women, minorities and other groups suffering discrimination in the production or supply chain (ILO Conventions 100 and 111).

We expect from our suppliers, agents and other business partners that:

- They take measures to ensure that all employees have the same rights and opportunities, including equal wages for equal work and equal advancement opportunities for senior and management
- They protect pregnant employees, for example by promoting childcare and paid maternity leave with return guarantee.
- They inform WRG immediately if discrimination is detected at any of their sub-suppliers.

Child labour

We continuously work to permanently eradicate child labour in the production and supply chain and to ensure that child labour is not displaced or relocated to other sectors or countries (ILO Convention 182).

We expect from our suppliers, agents, and other business partners that:

- They do not recruit or employ workers under the minimum legal working age in the country.
- They identify, prevent and reduce dangers for young employees.
- They protect young employees from work situations that are prohibited for them or that harm their mental or physical development.
- They inform WRG immediately if child labour is detected at any of their sub-suppliers.



Forced labour

We continuously work to prevent and eradicate forced labour in the production and supply chain (ILO Conventions 29 and 105).

We expect from our suppliers, agents and other business partners that:

- They do not limit the freedom of their employees, including prison labour, indentured labour, bonded labour or other forms of forced labour.
- Employees have the freedom to terminate their employment at any time according to the agreed notice period, without a penalty or salary deductions.
- Employees have the freedom to leave the production premises when their work shifts end.
- Personal documents or other belongings are not withheld by the employer.
- Employees are not charged, directly or indirectly, any fees or commissions related to their recruitment and/or employment process. If the recruitment agent requests any such fee, the worker will be reimbursed by the Supplier.
- Employees are not requested to provide deposits; payments will not be delayed, and wage
 advances or loans are not offered with the goal of indebting the worker and binding him or her to
 employment.
- Overtime is only performed voluntarily, does not exceed 12 hours per week, is not requested on a regular basis and is always compensated at a premium rate (ILO Convention 1).
- They inform WRG immediately if forced labour is detected at any of their sub-suppliers.

Freedom of association

We support and stimulate the freedom of association and collective bargaining for people on all levels of our supply chain (ILO Convention 135 and Recommendation 143).

We expect from our suppliers, agents and other business partners that:

They recognize, respect and support the rights of employees with regard to freedom of association and collective bargaining.

Living wage

Our aim is that the workers earn at least a living wage for a normal work week (without any extra time) in the production and supply chain (ILO Conventions 26 and 131).

We expect from our suppliers, agents and other business partners that:

- They compensate their employees sufficiently for a regular work week by adhering to national rules on minimum wage and aim for a wage that meets their basic needs and provides some discretionary income
- They work with local governmental or non-governmental organizations to take appropriate
 actions to realize this level of compensation where it is now below the level of living wage.

Safe and healthy workplace

Employees in our production and supply chain should work in conditions that are healthy and safe (ILO Convention 155).

We expect from our suppliers, agents, and other business partners that:

- They provide a safe and hygienic place to work.
- They pursue a zero-tolerance policy on sexual and physical violence, exploitation or abuse inside
 and outside industrial premises, including inspections and measures to be taken when it is suspected
 that violence, exploitation or abuse is taking place.
- They provide all necessary personal protective equipment and train their employees to use these.
- They inform WRG immediately if an unsafe or unhealthy workplace is detected at any of their subsuppliers.



Raw materials

We continuously work to significantly reduce the environmental impact in the production and supply chain and create a circular economy in the long term.

We expect from our suppliers, agents and other business partners that:

- They can provide an overview of the origin of the raw materials at all time.
- They acquire knowledge of the environmental impact of different types of raw materials and mitigate the impact of the total collection by using more environmentally friendly raw materials.

Water pollution and use of chemicals, water and energy

We continuously work to significantly reduce the environmental impact caused by the use and discharge of water, energy and chemicals in the production and supply chain.

We expect from our suppliers, agents and other business partners that:

- They work on the prevention of pollution and inefficient use of raw materials in the production process and treat wastewater properly.
- Waste water is properly treated by a well maintained ETP that has enough capacity for the type and
 volume of effluents generated from the operations, either on the production site or by an authorised
 external waste water treatment facility.
- Hazardous and non-hazardous waste are kept separate and stored in good order. Areas for sorting and/or storage of waste are marked and barrels/containers properly labelled.
- They inform WRG immediately if pollution or inefficient use of raw materials is detected at any of their sub-suppliers.

Animal welfare

We continuously work to prevent, reduce and eradicate animal suffering in the production or supply chain. Products we sell do not contain real fur, angora, down or feathers obtained by live-plucking and force-feeding.

We believe that animals that produce wool and animal hair for the products we sell should be treated responsibly, according to the 'Five Domains' or 'Five Freedoms' Model and raised on farms that preserve land health. Therefore, we expect our suppliers to have a policy in place that is linking up with animal welfare initiatives. We give preference to the standards developed by Textile Exchange and special initiatives like The Good Cashmere Standard (GCS), Sustainable Fibre Alliance, Mongolia Sustainable Cashmere Platform, Responsible Mohair Standard and Responsible Wool Standard.

We only sell Mohair if it is mohair from the Responsible Mohair Standard.

We expect from our suppliers, agents and other business partners that:

- They screen collections for the use of animal materials with a risk of animal welfare violations and take suitable action to keep this type of material out of the collection or to buy from suppliers with higher animal welfare standards.
- They only use raw materials that come from animals kept for meat production.
- They inform WRG immediately if the welfare of animals is below standard at any of their subsuppliers.

This CSR Code of Conduct is dated March 2024 and can be amended from time to time. For questions please contact us via csr@wehkamp.nl.