OETKER COLLECTION



POLICY STATEMENT ON THE HUMAN RIGHTS STRATEGY

OETKER COLLECTION

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1. POLICY STATEMENT ON THE HUMAN RIGHTS STRATEGY OF OETKER COLLECTION

1.1 Introduction

With revenue of nearly EUR 2.6 billion and approximately 8,450 employees, Oetker Collection is a globally operating Group of Companies. It comprises 148 companies in 39 countries.

Founded in 2021, Oetker Collection combines the agility of a young group of companies with more than 130 years of successful entrepreneurial tradition. As a family business, we follow a clear set of values that places responsibility, reliability, and quality at the centre of our actions.

With Oetker Collection we bring together many successful companies from various industries under one roof. Each company in the group holds a leading position in its respective market segment – whether nationally or internationally – and consistently pursues the goal of not only meeting customer expectations, but exceeding them.

The Oetker Collection Group of Companies operates worldwide and, thanks to its diversification, is active across a variety of industries. This comes with responsibility towards people, society, and the environment, which we strive to fulfil through our actions. Together with our around 8,450 employees, we pursue the goal of making a positive contribution to the future.

We are committed to complying with human rights standards. This policy statement describes the principles that guide our business activities and sets out the framework for how we strive to fulfil our responsibility towards people and the environment.

1.2 We are committed to respecting human rights

We at Oetker Collection KG and all our divisions (together, "Oetker Collection") consider respect for human rights a central element of our corporate responsibility. We take responsibility for the people working within our sphere of influence, as well as for communities and the environment along our value chains. This policy statement serves as a binding framework for our actions – in our own operations and in cooperation with our direct business partners. Where we have substantiated knowledge of material human rights and/or environment-related risks and/or violations, we also take appropriate ad hoc measures with regard to our indirect business partners.

Our commitment is based on the United Nations Universal Declaration of Human Rights as well as the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work.

These include, in particular, the following guiding principles:

- **Protecting children's rights:** We consistently protect children and young people. We do not accept any employment below the applicable minimum age requirement and actively oppose all other forms of child labour. Where risks exist, we take a risk-based approach: we create transparency, set clear expectations for business partners, and take preventive and remedial measures that place the protection of the child at the centre.

- **No forced labour:** Forced labour in any form is incompatible with our values; this also includes hidden forms such as debt bondage, confiscation of identity documents, or recruitment fees. We embed this principle in our processes and in our cooperation with suppliers – and we respond promptly to indications with appropriate measures, up to and including the effective cessation of harmful practices.

- **No slavery and exploitation:** We respect the dignity of every individual. We therefore tolerate neither slavery nor slavery-like practices or other forms of modern exploitation, including human trafficking. We expect the same from our business partners and reinforce it through clear standards.

- **Good working conditions:** We create working conditions that protect safety and health. Occupational health and safety are fundamental prerequisites for decent work – within our own operations as well as where we can exercise influence along the value chain. We aim to identify hazards, take preventive action, provide appropriate training to employees in relevant roles, and review the effectiveness of measures using a risk-based approach.

- **Respecting freedom of association and collective bargaining:** We respect freedom of association and the right to collective bargaining. This includes the right of our employees – under the laws of the place of employment – to freely choose whether or not to form a specific employee representative body or trade union and/or be represented by it. We embed this principle in our conduct, in relevant processes, and also as an expectation towards business partners; we take indications of restrictions seriously and address them through appropriate channels.

- **Opposing discrimination and unequal treatment:** We stand for a working environment shaped by respect, fairness, and inclusion. Discrimination and unequal treatment in employment relationships – particularly on the basis of gender, descent, ethnic origin, language, origin, physical or mental abilities, faith, and religious or political beliefs – have no place in our organisation. We promote non-discriminatory decision-making and ensure, through clear standards, safe grievance channels, and effective remedial action, that this principle is put into practice.

- **Ensuring appropriate remuneration:** We stand for appropriate and lawful remuneration as well as compliance with applicable minimum wage requirements. Wages must not be unlawfully withheld; pay practices must be transparent and comprehensible. We embed this principle in our standards and expectations, address risks in our supply chain using on a risk-based approach, and take adequate measures when irregularities become known.

- **Respecting the rights of local communities:** We respect ownership, usage and access rights as well as the livelihoods of local communities. We reject unlawful forced evictions and the unlawful deprivation of land, forests, and waters. In risk-sensitive contexts, we apply careful assessment, set clear expectations for partners, and ensure effective remedial action whenever indications of rights violations arise.

- **Use of security personnel:** We expect respect for human rights and compliance with applicable legal requirements in the use of security personnel. We do not commission or use security personnel who, due to inadequate selection, training, or oversight, violate the prohibition of torture, impair life or physical integrity, restrict freedom of association and collective bargaining, or engage in other unlawful practices. We take reports of potential violations seriously and ensure that such concerns can be reported through our whistleblower system and are appropriately addressed.

- **Protecting the environment and livelihoods:** We recognise the link between the environment and human rights. We therefore aim to avoid harmful contamination of soil, air and water as well as excessive water consumption – especially where health, access to safe drinking water, or livelihoods could be affected. We manage these risks through standards, preventive and remedial measures along our value chains.

- **International conventions:** In addition, we commit to adhering to relevant international conventions in the area of chemicals and waste management. These include, in particular, the Minamata Convention (mercury), the Stockholm Convention on Persistent Organic Pollutants, and the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal. In doing so, we support the protection of people and the environment from particularly harmful substances and risks.

- **Our business partners in the supply chain:** We expect our suppliers and business partners to respect the human rights standards described here and to establish appropriate processes for implementation – including within their own supply chains. We do not tolerate involvement in, participation in, or facilitation of human rights violations. Upon request, we expect comprehensible information and/or evidence of how compliance with human rights and environment-related requirements is ensured.

1.3 Compliance with applicable laws and respect for international standards

We comply with applicable national laws. In cases where international human rights are restricted by local legislation, we seek to uphold the principles underlying international human rights standards without coming into conflict with local laws. Where local laws go beyond international standards, we will comply with those laws.

1.4 Embedding responsibilities

As Oetker Collection KG we have established responsibilities for human rights and environment-related due diligence obligations within the group:

Overall responsibility for implementing and ensuring compliance with human rights due diligence obligations lies with the management board of the Oetker Collection KG. The management board has appointed a Human Rights Officer. The Human Rights Officer reports to the management board at least annually on the group's human rights and environment-related risk management. In addition, group companies have designated human rights ambassadors who support the Human Rights Officer in performing their duties and in fulfilling human rights and environment-related due diligence obligations. The human rights ambassadors are responsible for implementing the human rights and environment-related requirements within the group companies.

1.5 Requirements for us and our business partners

To live up to our commitment to respect human rights and environment-related due diligence obligations, we continuously embed binding standards and requirements in our processes. These apply to our employees as well as – on a risk-based and appropriate manner – to our direct (and, on an ad hoc basis, to our indirect) business partners:

- **Expectations for our employees (Code of Conduct):** Our Code of Conduct applies to all employees of the Oetker Collection Group of Companies and provides guidance for daily work. It serves as a compass and supports us in values-based classification of situations and actions in our day-to-day work. Our Code of Conduct addresses, inter alia, human rights and environmental topics, anti-corruption requirements, and other related expectations for our employees.

- **Code of Conduct for business partners / contractual clauses:** We place great value on implementing our values and principles together with our business partners. Therefore, depending on industry and business model, our group companies use business partner or supplier codes of conduct and/or appropriate contractual arrangements. These define concrete expectations and support consistent implementation in cooperation. The overarching framework is the Code of Conduct of the Oetker Collection Group of Companies.

- **Human rights training:** As a preventive measure, we rely on training related to our human rights due diligence obligations. Through trainings, for example on the requirements of the German Supply Chain Act, we promote awareness of our responsibilities among our employees.

1.6 We aim to identify risks early and act accordingly

We identify and assess risks relating to human rights and environmental pollution in our operations and among our direct suppliers regularly or on an ad hoc basis. When assessing risks in our supply chain, we also consider criteria such as regions of origin and the product groups of sourced goods and the industries of our business partners.

We prioritize human rights risks along our supply and value chain that may particularly endanger the rights of employees and other affected persons. These include, in particular, child and forced labour, exploitative employment practices, inadequate occupational health and safety, excessive or hazardous working hours, violations of freedom of association, and discrimination.

Based on the results of our risk analysis, we take appropriate measures and continuously develop them further.

1.7 Reporting platform for potentially affected persons and external parties; whistleblower protection

We promote an open and trusting corporate culture in which potential human rights risks, human rights violations, and breaches of legal or internal requirements can be raised without fear of retaliation or disadvantage. Employees, business partners, and other potentially affected stakeholders have access to our reporting platform through which suspected misconduct and compliance violations, including violations of human rights and environment-related standards, can be reported. The reporting platform is available to employees and third parties via an online tool. Reports can be submitted in various languages, anonymously, and in compliance with data protection requirements.

Individuals who report concerns or submit complaints in good faith will be protected against retaliation, discrimination, or any other form of adverse treatment. All reports are handled confidentially and reviewed in a fair and diligent manner, while respecting the rights of all parties involved. Through effective grievance mechanisms, we contribute to the early identification of human rights risks, the prevention and remediation of violations, and the implementation of appropriate corrective actions.

1.8 Outlook

We strive to continuously improve our commitment to human rights and to report on it in line with regulatory requirements. To this end, we regularly evaluate our risk management, governance structures, and existing processes. In doing so, we aim to identify potential improvement and continuously develop our processes in our own operations as well as our purchasing and procurement processes across our group companies.

Bielefeld, 16.10.2026

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