

# **Business Partner Code of Conduct**

**Annex 3 - Principles of Conduct**



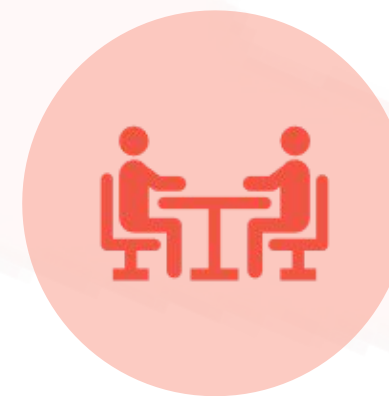
# „We act sustainably“

... is one of our six corporate values of the home24 Group (operating entities: home24 SE, home24 Retail GmbH, home24 Outlet GmbH, home24 eLogistics GmbH & Co. KG, Club of Style China Ltd., Butlers GmbH & Co. KG, Butlers Handel GmbH, Butlers Import GmbH) that shape our identity and guide our daily work. As a globally oriented and internationally active company, we bear responsibility for the conservation of resources and socially responsible business practices both within the home24 Group and among our business partners. In addition, compliance with applicable national and international laws and regulations relating to environmental protection, product safety and social issues serves as the basis for home24's long-term success and thus also the basis for any cooperation with business partners. Compliance with social and ecological sustainability criteria is therefore the joint responsibility of home24 and our business partners.

This Code of Conduct contains the essential expectations and principles that are set along the supply chain for the manufacture of products or the provision of services. With the Code of Conduct, the home24 Group pursues the goal of complying with the Supply Chain Sourcing Obligations Act (LkSG) and the principles of the International Labour Organisation (ILO) in the upstream supply chains. In addition, the Group is committed to the UN Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises and supports the United Nations' 2030 Agenda for Sustainable Development.

## Scope and Application of this Code

This Code of Conduct applies to all business partners of the home24 Group. By accepting a contract with us, our business partners undertake to respect human rights in accordance with the "Universal Declaration of Human Rights" of the United Nations and to observe and implement the fundamental environmental and social standards of this Code of Conduct. In addition, all national and international labour, social and environmental laws must be complied with. Furthermore, our business partners are obliged to adequately address the principles laid out in this Code of Conduct along their own supply chain to sub-suppliers, service providers, subcontractors and similar contractual partners and to monitor their compliance.



### Working Conditions



### Environment



### Business Ethics

The principles of this Code describe the absolute minimum of protection and support of rights for workers and for the environment. If national or international legal regulations, specific industry standards or applicable collective agreements contain stricter requirements than this Code of Conduct, these take precedence in all cases and must be complied with by our business partners.





# Working Conditions

## **Involuntary Work**

The home24 Group does not accept any form of forced or compulsory labour as defined in ILO Conventions 29 and 105, including the prohibition of forced overtime, debt bondage, human trafficking, slavery, prison labour or any other form of work that violates basic human rights. In addition, there must be no unacceptable treatment of workers, such as psychological hardship, sexual and personal harassment and humiliation. All work must be voluntary and without threat of punishment. Employees must be able to terminate employment at any time.

## **Child Labour**

No child labour may be used. All business partners of the home24 Group must comply with the recommendation from the ILO conventions (in particular ILO 138) on the minimum age for the employment of children. Accordingly, the age should not be less than the age at which compulsory schooling ends according to the law of the place of employment and in any case not less than 15 years. With reference to ILO Convention 182, all the worst forms of child labour (children under the age of 18), such as slavery, child trafficking, prostitution, illicit work or unhealthy and dangerous work are prohibited.

## **Working Hours**

Working hours shall comply with applicable law and industry standards. Working hours - including overtime and prescribed rest periods - shall not exceed the maximum working hours permitted by law or a maximum of 48 working hours plus 12 hours of overtime per week in total. All employees shall be entitled to at least one day off after every six consecutive working days. In addition, paid annual leave must be granted. ILO Conventions 1 and 14 apply.

## **Freedom of Association**

Business partners of the home24 Group must recognise the right of employees to form and join employee representative bodies, including trade unions of their choice, as well as the right to collective bargaining and the right to strike. In cases where freedom of association and the right to collective bargaining are restricted by law, alternative means of independent and free association of employees for the purpose of collective bargaining shall be provided. Workers shall not be discriminated against on the basis of forming, joining or being a member of such an organisation. Workers' representatives shall be granted free access to the workplaces of their colleagues to ensure that they can exercise their rights in a lawful and peaceful manner. ILO Conventions 87, 98 and 135 apply.



# Working Conditions

## Wages and Compensation

The wages paid by business partners of the home24 Group to their employees for regular working hours and overtime shall comply, at the least, with the national legal requirements or the minimum standards customary in the industry, whichever is higher. ILO Convention 131 applies to the setting of minimum wages. Business partners of the home24 Group shall also endeavour to pay remuneration that covers the cost of living and allows an amount for discretionary use by employees. This applies in particular when statutory minimum wages are not sufficient for this purpose (living wages). According to ILO Convention 100, equal pay for all genders for equal work is the goal. Wage deductions as punitive measures are not permitted. Business partners of the home24 Group must ensure that employees receive clear, detailed and regular written information about the composition of their remuneration. In addition, employees are to be granted all benefits prescribed by law.

## Health and Safety

Business partners of the home24 Group shall ensure safe, hygienic and healthy working conditions that comply, at the least, with the applicable occupational health and safety obligations under the law of the place of employment. The home24 Group expects all business partners to comply with appropriate safety standards in the provision and maintenance of the workplace, workstation and work equipment. In particular, appropriate protective measures must be taken to avoid exposure to chemical, physical or biological substances. Business partners of the home24 Group must promote occupational safety procedures that prevent accidents and injuries during work. In addition, access to clean sanitary facilities and drinking water in sufficient quantities must be ensured. Employees are to receive regular training on health and safety at work and are to be involved in the analysis of health risks and hazards. These requirements also apply to social facilities and accommodation for employees, if these are provided by the employer. Workers must be granted the right to remove themselves from situations of significant danger without obtaining permission from the company. ILO Convention 155 applies.





# Environment

## **Environmental and Resource Protection**

Business partners of the home24 Group must comply with the respective applicable environmental protection laws and regulations. In addition, all business partners must ensure that all required environmental permits are available, kept up to date and implemented.

The home24 Group expects all business partners to recognize their ecological responsibility throughout the entire supply chain and to implement it with regard to products, services and packaging. Business partners shall ensure that harmful environmental impacts are avoided or at least reduced wherever possible. The use and consumption of resources during production, including water and energy, and the generation of waste of any kind shall be reduced or avoided. Business partners of the home24 Group are obliged to implement suitable environmental measures and to work continuously on minimising environmental pollution.

## **Respect for Natural Resources**

Causing harmful soil changes, water pollution, air pollution, harmful noise emissions or excessive water consumption is prohibited if it significantly impairs the natural basis for the preservation and production of food, impedes or destroys a person's access to safe drinking water and/or sanitary facilities or damages a person's health.

## **Prohibition of Illegal Eviction**

Business partners of the home24 Group must respect the prohibition of unlawful eviction. Furthermore, the unlawful seizing of land, forests and waters for the acquisition, construction or other use of land, forests and waters, the use of which secures a person's livelihood, is prohibited.



# Environment

## **Waste, Hazardous Substances, Product Safety**

Business partners of the home24 Group must ensure environmentally sound production, use, treatment and disposal of chemicals. Chemicals or other materials that pose a risk when released into the environment shall be identified and handled in a way that ensures safety when handling, transporting, storing, using, recycling or reusing and disposing of them. Mercury shall be used in accordance with the prohibitions of the Minamata Convention of 10 October 2013 and persistent organic pollutants in accordance with the Stockholm Convention of 23 May 2001, as amended. Business partners of the home24 Group must also observe the relevant rules and regulations on the handling, collection, storage, disposal and export of waste. Non-environmentally-sound handling, collection, storage and disposal of waste is prohibited under the Persistent Organic Pollutants (POP) Convention. The prohibitions on the export of hazardous waste in the Basel Convention of 22 March 1989, as amended, must be observed. The home24 Group expects its business partners to avoid the use of hazardous substances and hazardous chemicals. Should these nevertheless be unavoidable, they must be labelled accordingly and their safe handling, storage, transport and disposal must be ensured. Furthermore, business partners of the home24 Group are obliged to comply with all product safety regulations.

## **Conflict Minerals**

The home24 Group requires all business partners to establish due diligence processes to promote responsible supply chains for minerals from conflict and high-risk areas that comply with the Organisation for Economic Cooperation and Development (OECD) Guiding Principles. This applies in particular to the conflict minerals tin, tungsten, tantalum and gold, as well as other raw materials such as cobalt. Smelters and refineries without adequate, audited due diligence processes should be avoided. Business partners of the home24 Group ensure that these requirements are also met in the upstream supply chain.

## **Timber Trade**

The home24 Group obliges all business partners to comply with the applicable national and international laws, regulations and directives on the trade and supply of timber and timber products, in particular the EU Timber Trade Regulation (Regulation (EU) No. 995/2010). Placing timber and timber products on the market from illegal logging is prohibited.





# Business Ethics

## **Corruption and Bribery**

Fairness, integrity and compliance with minimum moral standards are essential for a functioning business relationship. The home24 Group therefore does not tolerate any form of corruption, venality, bribery, acceptance or granting of unjust advantages. The same applies to other forms of influence such as fraud, blackmail, embezzlement or similar actions. All national and international laws and regulations relating to corruption and bribery must be complied with. Business partners of the home24 Group are obliged to report any case or suspicion of corruption to the home24 Group without delay. Attempts to bribe or deceive the home24 Group will result in termination of the business relationship.

## **Commissioning or Use of Security Guards**

The home24 Group prohibits its business partners from hiring private or public security forces if, due to a lack of instruction or control, the prohibition of torture is disregarded by the security company, life or limb is injured or the freedom of association and the related basic rights (such as freedom of assembly) are impaired.

## **Equal Treatment and Anti-Discrimination**

In terms of the ILO Convention, all employees are to be treated equally and with respect and dignity. Discrimination or unequal treatment on the basis of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion, belief, family responsibilities or other personal characteristics is not permitted. This applies in particular to recruitment, remuneration, access to training, promotions, dismissals or retirement. ILO Conventions 100, 111 and 159 apply.

Harassment of workers as defined in ILO Convention 190 on violence and harassment will not be tolerated. Workers shall not be subjected to physical, sexual, psychological, verbal or other harassment, abuse or discipline. Disciplinary action shall be taken only in accordance with applicable laws and in compliance with internationally recognised human rights. Employees who file a complaint under this Code shall not be subject to any form of disciplinary action.



# Business Ethics

## **Intellectual Property**

The home24 Group attaches great importance to the protection of intellectual property. When transferring technology and know-how, we expect our business partners to design these processes in a way that protects intellectual property rights and customer information. We are particularly committed to ensuring the confidentiality and protection of creative ideas and information in order to safeguard the rights of our partners and customers.

## **Fair Competition & Consumer Protection**

The home24 Group attaches great importance to compliance with fair competitive conditions, ethical advertising practices and fair trade. In this context, we expect all of our business partners to comply with antitrust law and consumer protection regulations.

## **Conflicts of interest**

The home24 Group expects its business partners to make business decisions in the interest of the company. This means that business decisions are made free from conflicts of interest with private interests, economic activities or other activities.

## **Data Protection**

In addition, the home24 Group attaches great importance to ensuring that our suppliers adequately protect the private information of our clients, suppliers, customers and employees. As a business partner, we expect you to strictly comply with applicable data protection laws, information security guidelines and official regulations when collecting, storing, processing, transmitting and disclosing personal data. The protection of privacy and the security of personal data are of paramount importance and we expect you to fulfil this obligation diligently.

## **Prevention of Money Laundering**

The home24 Group expects its business partners to strictly comply with the legal requirements for the prevention of money laundering and to actively avoid involvement in money laundering activities.



## Our Commitment

The home24 Group reserves the right to conduct audits or other assessments to ensure compliance with laws, rules and standards by our business partners. Audits or other checks may be carried out by the home24 Group or commissioned third parties. By accepting the contract, business partners of the home24 Group agree that these audits can be carried out during normal business hours at operating and production sites and to provide necessary documents to prove compliance with obligations in relation to laws, compliance with this Code of Conduct and/or other regulations. Should a breach of the regulations of this Code of Conduct be identified, the business partner shall be given an appropriate grace period in writing without delay after the home24 Group has become aware of it in order to bring its conduct into line with the regulations of this Code of Conduct. If a remedy is not possible in the foreseeable future, the business partner must notify the home24 Group and, in consultation with home24, draw up a concept with a timetable for ending or minimising the violation. If business partners of the home24 Group violate the international principles, if no measures can be taken to remedy such violations or if repeated or systematic violations are apparent, the home24 Group may terminate the business relationship and unilaterally terminate all related contracts with the business partner.

In the event of concerns about unlawful conduct or misconduct, we require all business partners to report it to the relevant whistleblower hotline, which can be found at the following link:

E-mail: [whistleblower@home24.de](mailto:whistleblower@home24.de)  
Online Questionnaire:



## Management Practice

The values and principles set out in this Code of Conduct are an elementary component of all business activities of the home24 Group. This Code of Conduct must be recognised by every business partner of the home24 Group and compliance with the Code must be ensured through verifiable measures. Employees of the business partner, including all companies belonging to the the business partner's corporate group, must be informed in a comprehensible manner about the contents of this Code and applicable national and international laws and regulations. This includes the provision of the Code of Conduct in the respective national language as well as oral information and training, especially in cases of illiteracy. In order to ensure and demonstrate compliance with this Code and legal requirements, business partners shall designate competent personnel and document implementation appropriately. In addition, all business partners of home24 are obliged to inform their employees, sub-suppliers, service providers, subcontractors and other contractual partners about the possibility of reporting complaints via the home24 whistleblower system.

### Imprint

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Chairman of the Supervisory Board: Matthias Ley

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