



CODE OF CONDUCT

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BOARD OF DIRECTORS



Martin Richrath

Chief Executive Officer

Gertjo Janssen

Chief Retail Officer

Jochen Pohle

Chief Retail Officer

Frank Duijst

Chief Financial Officer

01

Dear business partner,

Welcome to this Code of Conduct. As a valued business partner, you are a key part of our everyday activities. In order to ensure that EK delivers on its promises to all of its partners and stakeholders, the company strongly relies on the cooperation of both its employees and you as a business partner.

This Code of Conduct helps us to achieve a healthy corporate culture with a strong foundation of integrity, respect and transparency in all our collaborations. We will hold ourselves accountable to these standards and expect the same from our business partners.

The EK Code of Conduct is binding for our partners, establishing the minimum principles which are key in meeting our goals.

Respectfully,

OUR APPROACH

At EK, we feel a strong intrinsic motivation, and a responsibility to keep the earth we inhabit liveable, safe and healthy, in order to enrich people's lives. We strongly believe that local retail can contribute to these goals. Because of this, we offer our partners full support and build and strengthen long-term relationships in order to jointly offer the best products to our retail partners, as well as to take care of the people involved.

The EK Code of Conduct lays out the minimum standards we expect that we and all those (business partners) we work with will adhere to. We expect that all our partners share our commitment to contribute to the wellbeing of workers and to protect the earth. We hold ourselves accountable to these standards and expect our business partners to conduct themselves in accordance with the EK Code of Conduct.

Together with our business partners, we want to create a solid foundation for transparency, mutual respect and continuous improvement.

To whom this Code of Conduct applies

Our business partners:

- Our contracted brands
- Our suppliers in the supply chains
- Our service partners

All employees of EK and its subsidiaries, including the members of our Board of Directors, are required to read, understand, sign and fulfil the standards and obligations in the Code of Ethics, including the Code of Conduct for business partners.

The Code of Conduct is publicly available on EK's website.

General principles

This EK Code of Conduct (Code) outlines the social, safety and environmental principles (Principles) that EK requires each business partner to fulfil. EK is a member of amfori and a participant in the Business Social Compliance Initiative ([BSCI](#)), and in the Business Environment Performance Initiative ([BEPI](#)). Therefore, the principles of the amfori [BSCI](#) & [BEPI](#) Code of Conduct form an integral part of this Code.

EK is committed to establishing a culture of respect for internationally recognized principles and guidelines, including the International Bill of Human Rights (i.e. the UN Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights), the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. EK business partners are required to share this commitment.

By signing this document, the business partner declares that they will comply with the commitments of this Code. EK will inform the business partner of relevant future amendments to this Code.

02

General legal requirements

In all of their activities, all business partners must obey applicable national laws and regulations or international standards (whichever is stricter) including:

- (a) laws relating to employment, discrimination, the environment, safety and health;
- (b) laws relating to the import of products, including country of origin labelling, product labelling, and product testing, in addition to all contractual requirements;
- (c) any other laws.

If a business partner is of the opinion that national laws and regulations set a different standard of protection or conflict with one or more Principles as set out in this Code, the business partner must inform EK in due time prior to deviating from this Code.

Consequences in case of violations

EK will not tolerate any violations with regard to human and labour rights, breaches of law or other violations of this Code. Whenever we become aware of any form of intolerable conduct, we will firmly and swiftly evaluate the relationship with the business partner in question. EK reserves the right to conduct audits of the business partner's compliance with this Code, to work with the partner to define risk mitigation plans within an agreed timeline and to terminate relationships with business partners that are not able or willing to act in line with the requirements outlined. EK will take appropriate action if we are notified that these Principles have been violated in any way by any partners and/or EK employees. In case of a violation, we expect our business partners to be open to receiving support to integrate the Principles into their activities.

Our shared responsibility

EK expects its business partners to perform their due diligence* and pay particular attention to the topics set forth in this Code of Conduct. We expect our business partners to identify any possible adverse impacts in their supply chain, set specific objectives and take suitable measures based on the outcome of their due diligence activities.

EK is a key part of the value chain and therefore takes its responsibility with regards to its sourcing and buying activities seriously. We expect our business partners to inform us when EK's buying activities do not support the international social and environmental standards set out in this Code.

*Due diligence

Due diligence describes the actions taken by a company to identify and act on actual and potential risks to people and to the environment. The due diligence process considers not only the company's own operations but its entire supply chain as well. It is connected to business risk management, but starts with understanding what the risks to people and to the environment might be. Due diligence is based on proportionality – the right conduct depends on the severity of the impact, the company's involvement with the impact and its own ability to address it. Furthermore, it is guided by the principles established in international standards such as the United Nation's Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises (OECD Guidelines) which form the basis for this Code.

HUMAN AND LABOUR RIGH

EK expects itself and its business partners to treat all people throughout the whole value chain in a respectful manner with fair and safe working conditions. Therefore, our business partners must protect fundamental human rights and – at a minimum – respect all applicable local labour and safety laws.

Our company agrees to fulfil the following principles related to human rights, due diligence and environmental protection as set out in the amfori BSCI Code of Conduct. EK expects the same from our business partners.

Social management system and cascade effect

The business partner shall endorse the amfori BSCI Code of Conduct Principles through all the functions of the company and embed these principles in its own systems.

Worker involvement and protection

The business partner shall inform all workers about their rights and responsibilities and protect workers in line with the objectives of the amfori BSCI Code of Conduct.

The rights of freedom of association and collective bargaining

The business partner must respect the rights of workers to form and join trade unions, as well as to engage in collective bargaining.

No discrimination, violence or harassment

The business partner must treat all workers with respect and dignity, must ensure that workers are not subject to any form of violence, harassment, and inhumane or degrading treatment in the workplace and must not discriminate against workers.

Fair remuneration

The business partner must respect the right of workers to receive fair remuneration and work progressively towards paying a living wage.

Decent working hours

The business partner must observe laws regarding working hours and adhere to international references for specific exceptions.

Occupational health and safety

The business partner must ensure a healthy and safe working environment, identify potential and actual risks to the health and safety of workers and take all necessary measures to eliminate and reduce them.

No child labour

The business partner must not employ any worker below the legal minimum age either directly or indirectly.

Special protections for young workers

The business partner must provide special protection to young workers against working conditions which are may be harmful to their health, safety, morals, and development.

No precarious employment

The business partner must not engage in, or be complicit with through business partners, any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour and must adhere to international principles of responsible recruitment.

No bonded, forced labour or human trafficking

The business partner must not engage in, or be complicit with through business partners, any form of servitude, forced, bonded, indentured, trafficked or non-voluntary labour, including state-imposed forced labour.

ENVIRONMENTAL PROTECTION

At EK, we take our responsibility to protect the environment seriously. Because of this, we work continuously to further integrate environmental standards into our own operations and reduce the environmental impacts of our products, events and the services we provide to our retailers.

The business partner must implement adequate measures to prevent, mitigate and remediate adverse impacts on surrounding communities, natural resources, climate, and the overall environment.

Our company agrees to respect the following principles to exercise environmental due diligence and protection in as set out in the amfori BEPI Code of Conduct. EK expects the same from our business partners if the topics are material for EK and/or the business partner.

EK expects tier 1 suppliers (direct supplier of the final product) to do their utmost to deliver the data which we need to do our due diligence and comply with European legislation.

EK expects that brands which make products with one of EK's trademarks and/or retailer trademarks organized via EK will implement a process- and risk-based environmental due diligence management system in their business practices, adjusted to the business model of the company.

Energy and climate

EK supports the Paris Agreement and is working towards being a Net Zero company by 2050 at the latest. We are doing so by setting near term and in line with science-based targets and the 1.5 C pathway. EK challenges business partners to set science-based targets as well. EK is working to establish and implement effective management practices, and we encourage our business partners to do

the same to identify, quantify and reduce the greenhouse gas emissions resulting from their energy use. We expect that we and our business partners will use international good practices and standards to manage energy use. We also ensure that there are effective energy management practices in place in our own operations and those of our business partners.

Emissions to air

Ensuring effective management practices to identify, monitor, and control emissions to air and their impact on the environment and humans. Specifically ensuring emissions of ozonedepleting or other hazardous substances are strictly managed.

Water and effluents

Reviewing water and effluents management practices to identify, monitor, and ensure effective controls are in place to avoid adverse impact(s) on the environment and humans. Encouraging others to adopt measures that promote efficient water consumption and water reuse where possible. Encouraging others to adopt measures that reduce or eliminate the adverse impacts of effluents by reducing their quantity and/or their content of hazardous substances.

Waste

Reviewing waste management practices to identify, monitor, and ensure effective control of waste-related impact(s) on the environment. Monitoring waste generation and encouraging management practices that divert waste from disposal (reuse, recycling and/or other recovery operations). Encouraging others to adopt measures that reduce or eliminate the adverse impacts of waste, for example through improved processes.

Biodiversity

Reviewing management practices to identify, monitor, and control adverse impacts on biodiversity. Encouraging others to adopt, where possible, measures that create positive impacts for biodiversity.

Chemicals

Reviewing chemicals management practices to identify, monitor, and ensure effective control of chemical-related impact(s) to people and/or the environment. Encouraging others to use alternative substances that are less hazardous to people and/or the environment.

Nuisances

Reviewing management practices to identify, monitor, and control the impacts of noise and other potential nuisances, such as light pollution, dust or traffic on the environment and local communities, and where necessary, implementing corrective actions or remediation activities.

FAIR AND ETHICAL BUSINESS BEHAVIOUR

Dealing with bribery/ corruption

All business partners must commit to never tolerate corruption, and thus to comply with international and local anti-corruption laws and standards. This includes any benefits paid or offered to state authorities or other third parties in order to obtain a business advantage. Likewise, shall such payments or benefits may never be demanded or offered by a business partner.

Compliance with applicable law in the respective country

EK is committed to comply with applicable national and international laws, regulations and guidelines, taking into account the cultural values in the respective countries where we work. Compliance with all applicable laws and regulations is a matter of course for us. We expect the same from our business partners.

05

Confidentiality and data protection

When collecting, storing, processing or transmitting the personal data (e.g. name, address, telephone number, date of birth, health information) of employees, business partners or other third parties, we take the utmost care. We observe strict confidentiality protocols and comply with applicable laws and rules. We expect the same from our business partners.

Product quality and safety

All goods delivered by business partners to EK should fulfil with EK product regulations and requirements for physical performance, chemical performance and the EK general Purchase Terms & Conditions, as well as the General Supplier Conditions. In addition to this Code of Conduct, the Business Unit you are working with might provide you with additional requirements.

MONITORING COMPLAINTS

We expect our business partners to do their due diligence. We expect them to identify and act on actual and potential risks to people and to the environment. We request that all subcontracting is disclosed to us. Business partners should be able to provide information about due diligence processes related to the topics outlined in this Code.

AND 06

Complaint mechanism

If anyone feels that any provision of this Code may have been violated, it is absolutely critical that all persons throughout the value chain are able to raise concerns. Each business partner shall provide effective mechanisms for this purpose that enable individuals to report any grievances in a safe and/or anonymous way.

Audits

The business partner shall make it possible to verify compliance with the Code. At a corporate level, we require management systems to be in place that are appropriate for each partner's size and risk structure. In addition, our business partner must be aware of all companies, sites and other partners they are working with, and should be able to provide information about related due diligence processes related to the topics outlined in this Code.

Termination

In the event of a breach of the obligations contained in this Code, the business partner may be given a reasonable period of time to remedy the situation or, if this is not possible due to the nature of the breach, a warning may be issued. If the business partner allows the deadline to expire without taking remedial action or if there are repeated violations, the contractual relationship may be terminated without notice. In the event of repeated or serious violations, the contractual relationship may be terminated without notice, even without setting a deadline or issuing a warning. Further rights, in particular any possible claims for damages, remain unaffected by this.



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