

# Vorwerk Group Policy Statement on Respect for Human Rights

## Our Position

As an internationally active family-owned company with its roots in Germany, the Vorwerk Group is aware of its responsibility to respect human rights, and is committed to fulfilling its human rights and environmental due diligence obligations, both in its own business operations and in its value chain. So as to always act in accordance with the law and with our own corporate values, we base our actions on internal guidelines such as the Code of Conduct for Employees as well as the following international standards and frameworks:

- The Ten Principles of the UN Global Compact
- The UN International Covenant on Civil and Political Rights (ICCPR)
- The UN International Covenant on Economic, Social and Cultural Rights (ICESCR)
- The International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work
- The Universal Declaration of Human Rights (UDHR)
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- The OECD Guidelines for Multinational Enterprises

The purpose of this policy statement is to supplement our existing Code of Conduct with the requirements of the German Supply Chain Due Diligence Act (LkSG) and to set out our strategic approach to fulfilling our human rights and environmental due diligence obligations

## Our approach (risk management)

To safeguard human rights in our own operations and in our supply chain, we have established a risk management system that is continuously being developed and reviewed for effectiveness as part of an ongoing learning and improvement process. This task is performed by a cross-functional team of experts, which includes representatives from Purchasing, Sustainability, Governance & Compliance, Human Resources and Communications. This team is responsible for the Group-wide implementation of appropriate processes and measures to meet human rights and environmental due diligence obligations. The role of Human Rights Officer has been introduced as a monitoring function. This officer reports directly to the responsible member of the Executive Board, the Chief Operations Officer of the Vorwerk Group, thus ensuring a continuous flow of information to the top management level. In addition, the Human Rights Officer is responsible for informing the entire Executive Board about risk management and the implementation of the human rights strategy at least once a year or on an ad hoc basis at Executive Board meetings.

## Affected and potentially vulnerable groups

The Vorwerk Group works with various groups of people around the world. They are directly or indirectly affected by our business activities and, as part of our supply chains, could potentially be negatively impacted. These include:

- Our own employees
- Independent sales representatives
- Employees of business partners
- Employees of direct and indirect suppliers
- Indirectly related groups such as local communities and residents

## **Risk identification and prioritization**

The Vorwerk Group understands human rights due diligence as an ongoing process under constantly changing framework conditions. In order to identify potentially or actual negative impacts of our business activities on people and the environment at an early stage, both in our own operations and at our direct suppliers and business partners, we carry out annual and ad hoc risk analyses. We use a cloud-based ESG management and supply chain monitoring platform that enables us to conduct a holistic assessment of our own operations and those of our direct suppliers against existing social and environmental standards.

After analyzing the nature and scope of our business activities, we first use the abstract risk analysis, based on external data sources, to assess the abstract risk associated with our suppliers, business partners and independent sales representatives, which is derived from the country and sector risk. This results in an overall assessment of the human rights risks in our value chain which are potentially material.

We then prioritize these risks based on the appropriateness criteria of severity, causal contribution and influence. Based on this prioritization, we ask suppliers to provide detailed information on their social and environmental standards using standardized questionnaires. Once the questionnaires have been successfully validated, we initiate further control measures as necessary to identify any non-compliance and take corrective action as quickly as possible.

## **Preventive measures**

We have adapted our contracts and developed a code of conduct for our business partners, which must form the basis of all new business relationships and be communicated by our business partners to their own business partners. We monitor compliance with our human rights and environmental requirements on a risk-based basis, using standardized questionnaires and, where necessary, on-site audits.

We work to raise employee awareness of human rights and related due diligence obligations through regular information. In addition, we conduct mandatory training for specific target groups, particularly in the areas of purchasing and product management, to provide these groups with the relevant expertise which they must apply in their dealings with suppliers and business partners.

We strive to continuously expand the range of training and education courses in our own operations and also make them available to our direct suppliers and business partners on a risk-based basis.

## **Remedial measures**

If we become aware of human rights abuses in our own operations or those of our direct or indirect suppliers, we take immediate action to end the abuse as soon as possible. In develo-

ping and implementing appropriate remedial measures, we rely on the cooperation of our business partners, of which they must contractually assure us in advance. If the remedial measures do not end the violation, Vorwerk reserves the right to terminate the relevant contractual relationship.

### **Complaints mechanism**

An important addition to our risk analysis is the whistleblower system, which gives our employees, people along the entire value chain and other third parties the opportunity to anonymously report grievances, human rights violations or environmental violations. All reports received are treated confidentially, carefully investigated and followed up where there is reasonable suspicion. The whistleblower system is currently available in more than ten languages and will be expanded in the future to make it as accessible as possible.

### **Reporting and communication**

Starting in 2024, we will report annually to the German Federal Office of Economics and Export Control (BAFA) on the implementation of our Human Rights Strategy and our human rights and environmental due diligence obligations in the previous fiscal year. This report will be published on our corporate website and will be available for inspection for a period of at least seven years. In addition, as part of the European Corporate Sustainability Reporting Directive (CSRD), we will report on our risk management and our due diligence approach in our management report as of 2026.

The Executive Board of the Vorwerk Group