

Otto Group Code of Conduct for Services and Non-Merchandise

(Version: July 2023, updated: March 2025)

Respect for human rights, environmental protection and cooperation in the spirit of fairness are the pillars upon which a liveable society is built. It is the declared goal of the Otto Group to reconcile economic, ecological and social responsibility within a sustainable framework.

We perceive due diligence in the area of human rights not merely as the basis for our actions, but also as the starting point for cooperation with our business partners. In doing so, we see ourselves as equal partners in our business relationships. Our cooperation with business partners builds on partnership and mutual respect.

These requirements apply to all business partners for non-merchandise and services in the national and international companies within the Otto Group (also referred to in the following as the “Otto Group”). The Otto Group comprises all companies that are affiliated enterprises of Otto GmbH & Co. KGaA pursuant to Section 15 German Stock Corporation Act (AktG). Each business partner undertakes to adequately address and contractually agree the requirements enshrined in this Code of Conduct, also with their upstream supply chain actors.

The following requirements are based largely on internationally applicable standards such as the Universal Declaration of Human Rights, the UN Convention on the Rights of the Child and applicable conventions of the ILO as well as the respective national legislation, here in particular the Supply Chain Due Diligence Act (LkSG) in Germany.

1. Compliance with Laws

The Otto Group demands from all business partners compliance with all applicable legal requirements, both at its corporate location and in the countries in which its services and products are manufactured, provided, used and/or sold. The requirements enshrined by the Otto Group in this Code of Conduct may exceed the provisions set out in the laws of the respective countries. Business partners must notify the Otto Group if any requirement imposed by the Otto Group violates the legal provisions in the respective country.

2. Child Labour/Young Workers

The direct or indirect employment of persons under the age of 15 (unless the exceptions recognised by the ILO apply) is not permitted. Furthermore, the Otto Group does not permit the employment of persons below the age at which compulsory schooling ends or below the legal working age if this is higher than 15 (Gregorian calendar). In addition, children below the minimum working age are not allowed on the premises of employment sites, except in places that are designated for childcare. The Otto Group's business partners are obliged to take the necessary measures to prevent the recruitment of persons below the legal minimum age. Stricter national laws on the protection of children and young workers in the country of employment must be

complied with. Children/young persons must be protected from economic exploitation, the performance of work that is hazardous, that may interfere with the child's education and that may endanger the child's health or physical, mental, spiritual, moral or social development, and immediate measures shall be taken to eliminate circumstances and situations that place children at risk.

3. No Bonded, Forced Labour or Human Trafficking

The Otto Group shall in no way tolerate any form of slavery, forced, bonded, indentured, trafficked or non-voluntary labour, including state-imposed forced labour. No workers shall be forced directly or indirectly into employment through violence and/or intimidation. Persons may only be hired if they have made themselves available for employment on a voluntary basis. It is prohibited to order or force workers to perform involuntary work, in particular as a result of debt bondage or human trafficking. In order to avoid debt bondage, employees who are sourced from agencies or intermediaries must not be charged any recruitment fee. All employees shall be treated with dignity and respect. No employee shall be subjected to verbal, psychological, physical, sexual and/or physical violence, coercion or harassment.

The Otto Group's business partners shall be responsible furthermore for those employees who are sourced from agencies or other intermediaries and must also ensure in their dealings with these persons that forced or compulsory labour does not take place.

4. Health and Safety

Business partners shall ensure a safe and healthy working environment in accordance with the occupational health and safety obligations that are enshrined in law at the place of employment.

Business partners shall take the necessary measures to avoid accidents and work-related damage to health that may arise in connection with the occupation. Business partners must, for this purpose, establish and implement safety standards and protective measures that shall be suitable to identify, avoid and/or rectify potential hazards to the health and safety of their employees. In particular, all appropriate protective measures must be put into practice to ensure safety of the place of work, the workstation and the work equipment and to avoid exposure to chemical, physical or biological substances. They must guarantee furthermore that employees receive regular information and training with regard to the health and safety standards and measures in place. Business partners must document the measures set out above.

Business partners that always or sometimes place their employees in collective accommodation inside or outside their business premises must ensure that the accommodation is suitable to protect the health and safety of the employees. Furthermore, business partners must regularly inspect the accommodation to ensure that it is suitable.

5. Working Hours

Working hours, including overtime, shall comply with the applicable law at the place of employment, industrial standards or relevant ILO conventions, whichever is stricter. Employees are entitled to a free day after six consecutive working days. Care must be taken in this context

to prevent excessive physical or mental fatigue, in particular due to unsuitable work organisation in regard to the working hours and breaks. Overtime worked shall be remunerated separately in accordance with national standards.

6. Freedom of Association

Business partners shall take care to safeguard freedom of association, under which employees may freely become organised in or join trades unions and the trades unions are free to act as they choose under the framework conditions that apply at the place of employment, which shall extend to the right to take industrial action or engage in collective bargaining. Business partners shall ensure in their dealings with employees that joining and being a member of a trade union is not used as grounds for discrimination or retaliation.

7. Unequal Treatment

All forms of discrimination in regard to recruitment and employment are prohibited. In particular, any form of unequal treatment on the grounds of national and ethnic origin, social origin, health status, disability, sexual orientation, age, gender, political opinion, religion or belief, skin colour, membership of a workers' organisation or other personal attributes is prohibited, except where it is justified by the requirements of employment. Unequal treatment shall include in particular the payment of different remuneration for the same work. The Otto Group's business partners shall also be responsible for those employees who are sourced from agencies or other intermediaries.

8. Remuneration and Social Benefits

Business partners must guarantee payment of a reasonable wage to their employees that is at least equal to the minimum wage that applies by law or collective agreement or the minimum wage that is customary in the industry. Where neither statutory/collective nor industry-standard minimum wages apply at the place of employment, business partners must ensure that the wage paid is essentially sufficient to cover the basic needs of the employees, taking into account any individual circumstances that apply additionally (such as exclusively secondary income activities, part-time employment or similar).

All business partners are obliged to work towards the payment of living wages to their employees. Included in this is the first step of calculating the living wage according to the [Anker Methodology](#) and, in a second step, of developing a plan to implement payment of living wages. The overarching goal is to ensure consistent payment of living wages.

Furthermore, the Otto Group expects its business partners to pay their employees social benefits that are at least equivalent to the applicable statutory/collective minimum benefits.

9. Environmental Protection

Business partners must comply with the environmental laws that apply in each case. The Otto Group expects furthermore that business partners work continuously towards avoiding or reducing their environmental impact.

Business partners are instructed to manage natural resources efficiently and to convert to the use of renewable energy sources where possible.

In regard to environmental risks caused by the unlawful production, use, collection, storage and disposal of mercury and mercury products, persistent organic pollutants (POPs) and hazardous waste, business partners shall be required to comply with the prohibitions of the Minamata Convention, the POPs Convention and the Basel Convention as amended from time to time, as well as with any applicable EU regulation or national legislation.

The protection and conservation of the natural foundations of life through the avoidance of harmful soil changes, air or water pollution, harmful noise emissions or excessive water consumption must be ensured. In particular, all activities are prohibited that damage human health, deny persons access to safe drinking water and sanitary facilities and significantly impair the natural basis for the preservation and production of food.

10. Eviction

Business partners must comply with the prohibition of unlawful eviction and the prohibition of unlawful deprivation of land, forests and waters in the construction or other exploitation of these resources that are used to secure the livelihood of a person or group of persons.

11. Use of Security Personnel

When contracting or using private or public security personnel, all forms of violence, inhuman or degrading treatment, injury to life or limb and interference with the freedom of association and union shall be prevented by ensuring that the security personnel is adequately trained and monitored by the business partners.

12. Bribery and Corruption

The Otto Group perceives corruption as a cross-cutting issue, as it may undermine efforts to protect human rights and the environment. The Otto Group therefore does not tolerate any form of bribery or corruption. All business partners and their employees must conduct themselves in such a way that personal dependence, obligation or influence cannot arise. They are all expected to conduct themselves in a manner that ensures fairness and compliance with the national and international standards that apply in each case. Furthermore, business partners shall introduce mandatory anti-bribery and anti-corruption policies for all their operations. Where gifts are customary and polite in a particular country, care must be taken to ensure that this practice does not create any binding dependencies and that the applicable national legal standards are observed.

Indications of corrupt behaviour should be reported to the Otto Group using the whistleblower system (refer to the description in Number 16).

13. Data Privacy

Where the Otto Group entrusts business partners with personal data, they must ensure that this data is protected against misuse in accordance with the applicable laws, in particular the Federal Data Protection Act (BDSG) and the EU General Data Protection Regulation (GDPR).

14. Management Systems

Business partners undertake to introduce suitable and effective management systems in their organisational structures and workflows that enable monitoring and assurance of compliance with all elements of this Code of Conduct.

15. Verification of Compliance with the Code of Conduct by the Otto Group

Business partners are obliged, at the request of the Otto Group, to permit, enable or participate in inspections such as self-assessments or audits which are performed at their work and production sites, which are announced with reasonable advance notice, with regard to compliance with this Code of Conduct.

Where violations of this Code of Conduct are established, business partners shall be obliged without delay to initiate appropriate remedial measures as documented by the auditor in a remedial action plan and to complete such actions within a period that is appropriate for the individual remedial measure in each case. Upon request, business partners shall be obliged furthermore to share with the Otto Group documentary evidence confirming their implementation of remedial measures.

In the event of a critical violation of the Code of Conduct that necessitates the performance of a follow-up audit, business partners shall undertake to bear the costs of this follow-up audit.

The contractually agreed extraordinary right of termination shall apply irrespective of whether the business partner or one of its business partners (supplier or service provider, including subcontractors) violates the principles established under this Code of Conduct and/or fails to take appropriate remedial action.

16. Dealing with Reports and Infringements

Complaints or reports of infringements of the Otto Group Code of Conduct for Services and Non-Merchandise can be submitted to the Otto Group at any time – including anonymously – using the [SpeakUp whistleblower system](#).

Furthermore, Dr Buchert, Attorney at Law, is available as an independent and confidential contact in his capacity as external global ombudsman:

Ombudsman
Dr Rainer Buchert, Attorney at Law
Buchert Jacob Partner Rechtsanwälte PartGmbH
Kaiserstrasse 22
60311 Frankfurt am Main, Germany
Germany
Phone: 0049-69-710 33 33 0 or 06105-92 13 55
Fax: 0049-69-710 34 44 4
Email: dr-buchert@dr-buchert.de

All complaints that we receive (regardless of the channel) will be thoroughly investigated by the Otto Group. We will take appropriate remedial action, depending on the outcome of these investigations.

Whistleblowers are encouraged to report indications or violations only if they believe in good faith that the report is accurate.

All business partners must guarantee to refrain from discriminatory measures or disciplinary actions against whistleblowers who report potential violations.